

JOB APPLICANT



# GDPR Privacy Notice

Trusted  
Insurance  
expertise  
since 1887

 TH March

#TEAMTHM



# Introduction

---

As part of any recruitment process, T H March collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

---

## WHAT INFORMATION DOES THE ORGANISATION COLLECT?

T H March collects a range of information about you. This includes:

your name, address and contact details, including email address and telephone number;

details of your qualifications, skills, experience and employment history;

- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and

T H March collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

T H March will also collect personal data about you from third parties, such as references supplied by former employers. The HR Team will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

## WHY DOES T H MARCH PROCESS PERSONAL DATA?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, T H March needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows T H March to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. T H March may also need to process data from job applicants to respond to and defend against legal claims.

T H March processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

For some roles, T H March is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment and /or comply with a regulatory requirement to establish whether or not an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.



If your application is unsuccessful, your personal data will be kept on file in case there are future employment opportunities for which you may be suited. The HR Team will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **WHO HAS ACCESS TO DATA?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes the HR Team, interviewers involved in the recruitment process, Managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

T H March will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks. You will be asked to sign the attached Declaration of Consent and return this to the HR Team.

T H March will not transfer your data outside the European Economic Area.

### **HOW DOES THE T H MARCH PROTECT DATA?**

The security of your data is taken very seriously. T H March has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **FOR HOW LONG DOES T H MARCH KEEP DATA?**

If your application for employment is unsuccessful, the HR Team will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new Staff Privacy Notice.

## YOUR RIGHTS

As a data subject, you have a number of rights.

You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the HR Team. You can make a subject access request by email to the Regional Director - HR.

If you believe that T H March has not complied with your data protection rights, you can complain to the Information Commissioner.

## WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, T H March may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

## CHANGES TO THIS PRIVACY NOTICE

T H March reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

## CONTACT

If you have any questions about this privacy notice or how we handle your personal information, please contact the HR Team at [thmhr@thmarch.co.uk](mailto:thmhr@thmarch.co.uk).

---

## MONITORING & REVIEW OF NOTICE

This policy is reviewed annually by the Regional Director - HR.

- Policy last updated: April 2019
- Policy last reviewed: June 2023

The Company will regularly monitor the effectiveness of this policy to ensure it is achieving the objectives stated

---