

Data Protection Privacy Notice – Recruitment

DOCUMENT CONTROL

Document Details

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Name	Date	Reason for Changes	Version No.
Janet Rumney	April 2019	New Document	1.0
Harriet Deeble-Rogers	June 2021	Update to notice & annual review	1.1
Sarah Forfar	April 2022	Amended footer to Thesis	1.2
Sarah Forfar	July 2022	Annual Review	1.3
Sarah Forfar	October 2022	Legislation change	1.4
Sarah Forfar	June 2023	Annual Review	1.5

Distribution & Approval

This document has been distributed to the persons listed below. Business approval may be required where specified:

Name	Position	Purpose	Date

Data protection privacy notice (recruitment)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Your employer, Thesis Services Limited, Thesis Asset Management Limited or Thesis Unit Trust Management Limited, as the case may be, ('Company') is a 'data controller' and gathers and uses certain information about you. This information is also used by our affiliated entities and group companies, including TUTMAN LLP (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our affiliated entities and group companies. Your personal data is processed by Thesis Services Limited for the purposes of HR, payroll, provision of benefits and sickness and absence records, in accordance with data protection legislation, under the terms of a management services agreement.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection (employment) policy.

About the information we collect and hold

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (ie address, home and mobile phone numbers, email address);
- Details provided on your application letter, CV or application form such as your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs (for equal opportunities monitoring purposes);

We may collect the following information during your face to face interview, before making a final decision to recruit:

- Information gathered at interview and included in interview notes about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers ;
- Information regarding your academic and professional qualifications ;
- Information regarding your criminal record, in criminal records certificates (CRCs), Disclosure and Barring Service (DBS) check forms, DBS Certificates and enhanced criminal records certificates (ECRCs) ;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ;
- A copy of your driving licence .
- Details of your referees.
- A copy of your passport

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '' above to us to enable us to verify your right to work and suitability for the position.

How we collect the information

We may collect this information from you, your referees (details of whom you will have provided), your education provider, the relevant professional body, the Disclosure and Barring Service (DBS) and the Home Office.

Why we collect the information and how we use it

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our Data Protection Regulation Employment Policy):

- to take steps to enter into a contract;
- for compliance with a legal and/or regulatory obligation (eg our obligation to check that you are eligible to work in the United Kingdom);
- for the performance of a task carried out in the public interest; and
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as HR consultants, professional advisers and pre-employment screening companies. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

Sensitive personal information and criminal records information

Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Data Protection Regulation Criminal Records Information Policy, available by contacting the HR department via email at hr@thesisam.com.

Retention of Data

If your application is unsuccessful, the information you have provided will be retained for a period of 12 months from the date that your application was rejected.

Criminal record information is held for six months after the assessment was last used. If the Head of Compliance considers it necessary to keep the information for longer than six months the DBS should be consulted.