

Introduction

Critchleys¹ is committed to ensuring complete transparency with respect to the collection and use of personal data and to adherence to all data protection obligations.

The Firm's Human Resources department (HR) collects and processes personal data and sensitive personal data relating to all applicants who apply for a position at the Firm in order to manage the recruitment process and assess applicant suitability for employment with the Firm. Personal data is also collected from applicants to ensure the Firm complies with legal obligations i.e. eligibility to work in the UK, and to respond to legal claims should these arise.

Personal Data Collected

During the recruitment process, the personal data held about applicants is as follows:

- Direct personal identifiers such as name, date of birth, address, contact details;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- Information about your current level of remuneration, including benefit entitlements;
- Whether or not you have a disability for which the Firm needs to make reasonable adjustments during the recruitment process – we process such information to carry out our obligations under the UK's disability rights and anti-discrimination legislation;
- Information about your entitlement to work in the UK.

If and when an applicant is successful in the recruitment process, the personal data held is as follows:

- Details of your schedule (days of work and working hours) and attendance at work;
- The terms and conditions of your employment;
- Sensitive information such as health data to ensure your safety at work and/or to provide you with appropriate occupational health services;
- Sensitive information in the form of criminal convictions disclosed in relation to Disclosure and Baring Service checks.

How Personal Data is Collected/Obtained

Initial information is usually collected from the Curriculum Vitae submitted during the recruitment process. Further information is collected from:

- Forms completed by you at the start of or during employment;
- Our correspondence with you;
- Interviews, meetings or other assessments;
- Right to work documentation such as your passport or driving licence;

¹ Includes Critchleys LLP, Critchleys Audit LLP, Kinetix Critchleys Corporate Finance LLP and landtax LLP collectively known as the Firm

- Third parties, such as references supplied by former employers. We will only seek this information once a job offer has been accepted by you, if and when you are successful in the recruitment process.

Management of Personal Data

Applicant personal data is only shared between colleagues/managers who legitimately require the information to undertake the recruitment exercise. The recruitment data of successful applicants is shared with previous employers to obtain references.

Data Retention

If your application for employment with the Firm is successful, any information obtained during the recruitment process will be transferred to your employee personnel file (electronic) and retained for your duration of your employment. The periods for which your personal data will be held are detailed in a separate privacy policy which will be included in your pre-employment on-boarding documentation.

If your application for employment is unsuccessful, your CV and other personal data gathered through the recruitment process will be retained for 6 months and will then be deleted.

On occasion the Firm may request applicant consent to hold a CV for a specified longer period of time in order that the applicant may be considered for future employment opportunities within the Firm.

Security and the Protection of Personal Data

We take the security of our information and systems extremely seriously. All personal information that is collected, whether electronically, on paper, or by other means, is protected appropriately in line with data protection obligations.

Controls and measures are in place to minimise loss or damage of personal data through accident, negligence or deliberate actions. Critchleys staff also protect sensitive and confidential data when storing or transmitting data electronically.

Our security controls are under frequent evaluation to manage risks to the confidentiality, integrity and availability of your personal information.

Data Controller and Data Privacy Officer

The Data Controller is:
Critchleys LLP, Beaver House, 23-38 Hythe Bridge Street, Oxford OX1 2EP.

If you have any queries or comments about this privacy statement or how and why personal data is processed, please contact us:

Data Privacy Officer
Critchleys LLP

Beaver House
23 – 38 Hythe Bridge Street
Oxford
OX1 2EP

Email: dataprotection@critchleys.co.uk
Telephone: 01865 261100

Individual Rights and How to Exercise Them

Individuals have specific rights over their personal data gathered and processed by Critchleys as described below:

Right of Access – Individuals have a right to access to their personal data held by Critchleys LLP as a data controller – this is known as a Subject Access Request. Please write to HR or email them on jdrury@critchleys.co.uk or email the Data Privacy Officer at the above address to make such a request. Critchleys will respond to Subject Access Requests within 30 calendar days.

Right to request that your personal information is amended – to update your personal information, please write to HR or email them on jdrury@critchleys.co.uk Your personal details will be updated as soon as practicable possible following receipt of a request.

Right to be ‘forgotten’ or to request erasure – an individual may ask that their personal data is removed or deleted if there is not a compelling reason for Critchleys to retain it. Please contact the Data Privacy Officer at the above address if you wish to request that your data is removed.

Right to withdraw consent – Where personal data is processed under the lawful basis of consent, an individual has the right to withdraw consent to that processing at any time. To withdraw consent, please email us at jdrury@critchleys.co.uk or dataprotection@critchleys.co.uk

Right to data portability – an individual may request a copy of their personal information in a format that would allow it to be transferred to another company in a safe and secure way. For further information, please contact the Data Privacy Officer at the above address.

Right to restrict data processing – an individual may request that the processing of their personal information is restricted. Critchleys may retain the personal information in such circumstances but will ensure it is not used for the purposes that have been restricted.

Right to object – an individual may object to the processing of their personal information for direct marketing (including profiling) and where it is being processed for our legitimate interests. For more information, please contact the Data Privacy Officer at the above address.

Changing Privacy Laws

Critchleys recognises that the transparency of data processing is extremely important. This privacy statement will be kept under regular review to ensure it complies with current data protection laws.



Complaints

We take great care to comply with the laws governing the protection of personal data. If, however, you do want to complain about our use of personal data, please send an email with the details of your complaint to the Data Privacy Officer at dataprotection@critchleys.co.uk and we will look into your concerns.

You have the right to bring your concerns to the attention of the Information Commissioner's Office. For more information about how to complain to the ICO, please refer to the [ICO website](#).

Equality Impact

The impact of this policy on all groups has been considered and has been judged to be fair and reasonable.

Owner:	HR & Compliance	Publish Date:	May 2019
Location:	HR	Last Reviewed:	October 2022
Version:	1.1	Review Date:	October 2024