

Carey Olsen Recruitment Privacy Notice

Introduction

At Carey Olsen ("we", "us") we are committed to protecting and respecting your privacy. Your personal information is important to us, and we take the responsibility of accessing, processing, and storing your personal information seriously. This notice describes how we, acting as a data controller for the purposes of recruitment, collects, uses, and shares the personal information you provide to us when you apply for a position with us.

Please ensure that you read this notice, which supplements our [Privacy Policy](#) before you continue onto the application process.

Carey Olsen is an international law firm operating in nine jurisdictions. Our offices include jurisdictions outside the European Union which have not been deemed adequate for European Union data protection purposes (namely Bermuda, Singapore, the Cayman Islands, British Virgin Islands, Hong Kong SAR, and the Republic of South Africa). However, please note that Carey Olsen operates global data protection policies, and those offices are required to meet the same standard as our other offices.

Scope

This notice only applies to the personal information of job applicants, potential candidates for recruitment, interns or work experience students, potential consultants and/or partners, and should you be offered a role, the onboarding process. We will only ask for and process the right amount of personal information to allow us to process your application fairly and consistently. During the recruitment process we may ask for personal information that under certain data protection laws is deemed to be 'sensitive data'. When we need to ask for this, we will ensure that it is strictly relevant to the application process.

We may ask for information directly from you, from third party recruitment agencies, agents or other third parties as part of the recruitment process. Where it is necessary for us to use external parties, we will have conducted due diligence on them to ensure that their privacy standards are at least equal to Carey Olsen standards.

Personal data we collect and grounds for processing

Data protection laws require us to declare "the grounds for processing" – the reasons that we need the personal information we request from you. We have identified four grounds for processing personal information during the recruitment process:

- Legal obligation – processing is necessary for compliance with legal obligations which we, as data controller, are subject to.
- Contractual – processing is necessary for the performance of a contract with you or is necessary prior to entering a contract at your request.
- Consent – you have given your consent to us to process your personal information for the specific purpose of recruitment.
- Legitimate interest – processing is necessary to protect our interests while managing the recruitment process, or the legitimate interest of a third party involved in the recruitment process.

The types of personal information we collect may include your name, address, email address, telephone numbers, nationality, employment history, educational achievements and certifications and any additional personal information that you share with us as part of the recruitment process. This may differ depending on the jurisdiction the role is based in. To enable us to process your application we may collect your personal information from the following sources:

| Source of Information | Type of Information |
|---|---|
| Direct from the candidate, e.g., Curriculum Vitae, covering letter, interview | Name, address, email address, telephone numbers, nationality, employment history, educational achievements and certifications and any additional personal information that you share. |
| From a recruitment agency | Name, address, email address, telephone numbers, nationality, employment history, educational achievements and certifications and any additional relevant personal information that you have shared with the agent. |
| Background check agencies | Relevant checks confirming the information that you provided during your application process was accurate. Where required, checks related to criminal offences and proceedings. |
| Individuals and organisations providing references | Information from prior employment, verifying your previous roles and experience. |
| Social media | Any personal information that you have made publicly available on social media sites such as LinkedIn, Facebook, or other popular sites. |
| Assessment agencies | Name, email address and results from psychometric testing to assess your skills and suitability for the role. |

Depending on the progress of your application, and if you receive, and accept an offer of employment from us we may also need the following (but not limited to) personal information:

- Emergency contact information – next of kin
- Payroll information – including bank account, pension contributions, tax, and national insurance information
- Contractual information – benefits, pensions, medical insurance
- Diversity and equal opportunities – nationality, racial or ethnic origin, religion, and disabilities, medical requirements, and your age
- Identification – passport, driving licence, ID card
- Photographic – some offices require a photographic identity badge for security reasons.

We may process the following types of special category data during the recruitment process:

- **Health information** if we need to make reasonable adjustments to the recruitment process for you. This is to carry out our obligations and exercise specific rights in relation to employment
- **Other special categories of data**, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes
- **Criminal record data** in order to satisfy ourselves that there is nothing in any criminal convictions history which you may have which makes you unsuitable for the role. This is to carry out our obligations and exercise specific rights in relation to employment.

Personal data retention

If you accept a position of employment from Carey Olsen, all relevant personal information collected during the recruitment process will be transferred to your personnel record and will be retained by us for the duration of your employment or in accordance with the specific jurisdictional requirements. We may continue to collect personal information during your employment with us such as salary increase, bonus payments, promotional or role changes. If your employment with us ends, we will retain your personal data for as long as necessary for the purposes for which it was collected.

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process. After this period, we will securely destroy your personal information in accordance with our data retention policy.

Your rights

You have the following rights in respect of the personal information about you that we process, the scope and applicability of which will depend on the circumstances:

- The right to access and port your personal information
- The right to rectify your personal information
- The right to restrict the use of your personal information
- The right to request your personal information is erased
- The right to object to the processing of your personal information

Please let us know as soon as possible if any of your personal information changes (including your correspondence details) to ensure we can continue the recruitment process.

Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time.

You also have the right to lodge a complaint about the processing of your personal information. You can either contact us directly by emailing our Group Data Protection Officer at dataprotection@careyolsen.com or by contacting the Office of the Information Commissioner in [Jersey](#), the Office of the Data protection Authority in [Guernsey](#), the Information Commissioners office in [UK](#) or the data protection authority in your home jurisdiction.

Contact information

If you have any questions in relation to this notice, please contact our Group Data Protection Officer by emailing dataprotection@careyolsen.com.

We may change this notice from time to time by updating this page. Please regularly check back to ensure you are aware of the most up to date notice and are happy with the changes made. This notice was last updated on 16th February 2023.