



## 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

Orri Ltd ('Company') is a 'data controller' and gathers and uses certain information about you. Our contact details are:

Orri Ltd  
14 Hallam Street London  
W1W 6JG  
020 8918 6340  
[dp@orri-uk.com](mailto:dp@orri-uk.com)

Our Data Controller is Lee Strachan and can be contacted at [dp@orri-uk.com](mailto:dp@orri-uk.com)

### Data protection principles

We will comply with the data protection principles as set out in our Data Protection Policy when gathering and using personal information.

### About the information we collect and hold

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, ie before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

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.

### Where information may be held

Information may be held at our offices, and third party agencies, service providers, representatives and agents as described above.

## How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and whether you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will only keep the recruitment information that is necessary in relation to your employment.

Further details are available in the following Orri Policies:

- GDPR Data Protection (Employee data)
- GDPR Data Retention
- Information governance
- Records and record keeping

## Your rights in respect of your information

You have the right to:

1. request access to the information we hold about you at any time
2. object to our processing of your personal data where we are processing it on the grounds of our legitimate interests and you think that your rights and interests outweigh our own.
3. have data corrected if it is inaccurate
4. request that we restrict the processing of any of your personal data in certain circumstances
5. request that any of your personal data be erased in certain circumstances, such as where we are not entitled under the law to process it, or it is no longer necessary to process it for the purposes for which it was intended.

You also have the right to receive your data in a certain format so that you can transmit it to another Data Controller.

Further information about these rights can be found in our Data Protection Policy or can be provided on request. If you would like further information, or wish to exercise any of these rights, including making a request for access to your personal data, please contact our DPO, Kerrie Jones, at 14 Hallam Street, London, W1W 6JG.

## Keeping your personal information secure



We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. Please contact them at [dp@orri-uk.com](mailto:dp@orri-uk.com). If not, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> for further information about your rights and how to make a formal complaint.

THE SCHEDULE  
ABOUT THE INFORMATION WE COLLECT AND HOLD

**Part A**  
**Up to and including the shortlisting stage**

The information we collect	How we collect it	Why we collect it	How we use and may share it
<p><b>Your name and contact details (ie address, home and mobile phone numbers, email address)</b></p>	<p>From you</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>To enable HR personnel or the relevant department manager to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the relevant manager or department of your application</p> <p>To make an informed recruitment decision</p>
<p><b>Details of your qualifications, experience, employment history (including job titles, Salary and working hours, and interests)</b></p>	<p>From you, in the completed application form and interview notes (if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>Details may be provided to the relevant manager and other personnel involved in the recruitment process, including internal or external HR or Recruitment Advisers</p> <p>If you are unsuccessful in your application, details may be passed on to an associated company to see if they have any suitable vacancies with your agreement</p>
<p><b>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</b></p>	<p>From you, in a completed anonymised equal opportunities monitoring form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>For further information, see * below</p>
<p><b>Information regarding your criminal record</b></p>	<p>From you, in your completed application form</p>	<p>To comply with our legal obligations</p>	<p>To make an informed recruitment decision</p>

<b>Details of your referees</b>	From your completed application form	For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To carry out statutory checks Information shared with DBS and other regulatory authorities as required
		Legitimate interest: to carry out a fair recruitment process	For further information, see * below To carry out a fair recruitment process
		Legitimate interest: to make an informed decision about who to recruit	To comply with legal/regulatory obligations
		To comply with our legal obligations to obtain regulatory references	Information shared with relevant managers, HR personnel (including, where appropriate, external HR and/or Recruitment advisers) and the referee

## Part B

### Before making a final decision to recruit

The information we collect	How we collect it	Why we collect it	How we use and may share it
<b>Information 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*</b>	From your referees (details of whom you will have provided)	<p>Legitimate interest: to make an informed decision to recruit</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To obtain the relevant reference about you</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers and HR personnel, including external HR and Recruitment advisers where appropriate.</p>
<b>Information regarding your academic and professional qualifications*</b>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers and HR personnel, including external HR and Recruitment advisers where appropriate.</p>

<p><b>Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates ECRCs*</b></p>	<p>From you and from the Disclosure and Barring Service (DBS)</p>	<p>To perform the employment contract To comply with our legal obligations</p> <p>Legitimate interest: to verify the criminal records information provided by you</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p>
<p><b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information*</b></p>	<p>From you and, where necessary, the Home Office</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain employment records</p>	<p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p> <p>Information shared with relevant managers and HR personnel, including external HR and Recruitment advisers where appropriate.</p>
<p><b>A copy of your driving licence*</b></p>	<p>From you</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p>	<p>To make an informed recruitment decision</p> <p>To ensure that you have a clean driving licence</p> <p>Information may be shared with our insurer</p> <p>Information shared with relevant managers and HR personnel</p>



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.

Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in the following policies:

- Staffing recruitment
- GDPR Data Protection (Employee data)
- GDPR Data Retention
- Information governance
- Records and record keeping

Copies of these policies are available on request from [dp@orri-uk.com](mailto:dp@orri-uk.com)