

# Privacy notice from Ruffer LLP



## Recruitment candidates

### What is the General Data Protection Regulation (GDPR)?

It's a law which addresses what we can and cannot do with your personal data. 'Personal data' is information that identifies individuals directly or from which individuals can be identified indirectly. We are the 'data controller' in relation to your personal data that we hold, because we control the storage and use of that personal data.

### About this notice

One of the requirements of GDPR is that we tell people whose personal data we process about how we process it. 'Processing' includes obtaining, recording or storing personal data and carrying out any tasks using the personal data. This notice also describes your data protection rights, including a right to object to some of the processing which we carry out.

### For what purposes do you process my personal data?

We may process your personal data for a number of different purposes

- to identify and source talent through the use of recruiters, word of mouth referrals and recruitment fairs
- to assess your suitability for a role you have applied for
- to conduct psychometric, numeracy, or other competency assessments (which may be conducted by a third party) as part of the application process for certain roles
- to assess your eligibility to work in the UK
- to conduct pre-employment screening checks, including credit, criminal record, qualification and employment checks

- to make reasonable adjustments as a result of any disability or health condition you choose to tell us about and

- to conduct diversity and equal opportunities monitoring and other statistical analysis, carried out on an anonymised and aggregated basis.

Once you start working for Ruffer we will collect and process more personal data about you for the purposes of paying you, arranging benefits, implementing Ruffer policies, health and safety considerations, regulatory compliance, monitoring, information security, learning and development, travel and to contact your next of kin in an emergency, amongst other things. We will provide you with further details about this processing on or before your first day.

For details of how personal data is processed through our website and the cookies we use, please go to [ruffer.co.uk/privacy](https://ruffer.co.uk/privacy).

### What are the lawful grounds on which you rely to process my personal data?

These are as follows

- the processing is necessary in order to perform the employment, consultancy or partnership contract or to take steps at your request to enable us to enter into a contract with you
- the processing is necessary for compliance with a legal obligation
- the processing is necessary for the purposes of complying with specific employment law rights or requirements
- Schedule 1, part 1 of the Data Protection Act 2018, which provides for the processing of criminal records information in the employment context and/or

- the processing is necessary for the purpose of our legitimate interests.

‘Legitimate interests’ is a heading that covers a number of different reasons why we might need to process your personal data which may not be covered by other headings, for example

- to attract and secure the best talent to work with us
- to ensure the candidates we offer positions to are suitable for the role
- to comply with regulation or regulatory guidance and
- to monitor and improve our recruitment process.

#### How do you collect my personal data?

We collect personal information about you during the recruitment process, either directly from you or from a recruitment firm, employment agency, pre-employment screening provider, previous employer or referee. We will generate information about you during the interview process and from any assessments you participate in.

#### Do I have to provide my personal data to Ruffer?

You are in control of the personal data you choose to provide us in your CV. However if you choose not to provide certain details (in your CV or otherwise), for example in relation to your qualifications or previous experience, then we may not be able to assess you for the role or conduct checks that we are required to undertake for regulatory purposes, which could result in you not being offered a position.

#### What rights do I have over my personal data?

GDPR gives you a number of rights over your data, subject to certain criteria being met. These are

- right of access – a right to obtain a copy of the data we hold about you as well as some supplementary information on that data

- right to rectification – a right to require us to correct mistakes in the data we hold about you
- right to data portability – a right to require us to transfer personal data which you have provided to us, to you or to someone else
- right to object – a right to object to the processing of your data where we rely on our legitimate interests as the lawful basis for processing
- right to erasure – a right to request us to erase personal data that we hold about you
- right to restriction – a right to request we restrict our processing of your personal data in certain circumstances and
- right to withdraw your consent to our processing of your personal data at any time. Please note, however, that since we generally rely on other lawful bases to process your personal data we may still be entitled to continue to process your personal data if we have another legitimate reason (other than consent) for doing so.

If you wish to exercise any of these rights please get in touch with your usual contact at Ruffer or email [hr@ruffer.co.uk](mailto:hr@ruffer.co.uk) and we will provide you with further information regarding how to exercise these rights and in what circumstances they are available.

#### To whom might you pass my personal data?

We may share your personal data with third parties whom we engage to assist us with the recruitment process, such as

- recruitment firms
- psychometric, numeracy, or other competency assessment providers
- referees and
- pre-employment screening providers, who in turn may contact your academic institutions, previous employers and other third parties to verify

information you have provided. We will notify you before undertaking pre-employment screening checks.

Certain of your personal details will also be stored and accessible to the provider of our third party HR management system.

We outsource the early stages of the selection process for our Technology graduate programme to a specialist third party graduate recruitment firm and any applications for this scheme sent to Ruffer will be passed to them to manage.

#### Do you ever pass my personal data outside the EU?

Third parties whose services we use may transfer your personal data to other third parties who in turn they use to provide their services to us. We ask such third parties to put in place appropriate safeguards where this involves a transfer of personal data outside the EU.

Occasionally our pre-employment screening provider may need to transfer your data to an organisation in a country outside the EU which is not considered to be adequate or to have appropriate safeguards in place for data protection purposes, for example to verify your qualifications if you attended a non-EU institution. These types of transfers, which are required to enable us to enter into a contract with you, will only take place occasionally and where necessary, and will be in accordance with the provider's privacy policy, details of which are available on request from [hr@ruffer.co.uk](mailto:hr@ruffer.co.uk).

#### How long do you keep my personal data?

If your application is successful we will keep your personal data for as long as you work for Ruffer and for as long as it is reasonably necessary to hold onto your information after that.

If your application is unsuccessful we will keep your personal data for as long as reasonably necessary to monitor repeat applications or for a longer period if you would like us to consider you for other roles.

#### Do you subject my personal data to any automated decision making?

No.

#### What happens if I want further information about your use of my personal data?

You may address any questions or queries to our Data Protection Officer, Craig Lindsay-Smith, at the following address

Ruffer LLP  
80 Victoria Street  
London SW1E 5JL  
[clindsay-smith@ruffer.co.uk](mailto:clindsay-smith@ruffer.co.uk)  
+44 (0)20 7824 0548

You may also contact Craig with regard to all issues related to our processing of your personal data and to the exercise of your rights noted above.

Alternatively, please address any questions or queries to the HR team, [hr@ruffer.co.uk](mailto:hr@ruffer.co.uk).

#### Right to lodge a complaint with the supervisory authority

You have a right to lodge a complaint in relation to our processing of your personal data with the supervisory authority, the Information Commissioner's Office. The number for their helpline is +44(0)303 123 1113.

#### Updates to this notice

We may update this notice from time to time to reflect changes in the way we process your personal data or to clarify information we have provided in this notice.