

# **Recruitment Privacy Notice London**



*Last updated: 31 March 2023*

## About the Firm and this Recruitment Privacy Notice

Cleary Gottlieb Steen & Hamilton LLP is an international law firm practising in a number of jurisdictions around the world through affiliated legal entities and branch offices of those entities. In the UK the firm practises through Cleary Gottlieb Steen & Hamilton LLP, a limited liability partnership registered in England and Wales (the “**Firm**” or “**we**”).

This Recruitment Privacy Notice is intended to inform applicants for Insight Days or employment in the Firm’s London office (“**you**”) about how we collect, use and share your personal information during the recruitment process. This Recruitment Privacy Notice also informs you of your rights in relation to your personal information and how to exercise those rights.

This Recruitment Privacy Notice applies to all personal information we collect about you and use during our recruitment process (“**your Personal Information**”). The Firm is the controller for your Personal Information processed in the course of our recruitment-related activities in the UK.

## The Personal Information we collect about you

During our recruitment process we will either collect your Personal Information directly from you, or you will provide it to us via your referees, or one of our external recruitment partners such as a recruitment agency, a test provider, a contextual recruitment system provider or a pre-employment screening provider. We may also consider Personal Information that is publicly available, such as your LinkedIn profile.

The types of Personal Information that we collect and use during the recruitment process will depend on the role you are applying for and how far your application progresses, but may include:

- **name and contact details:** your full name; home address; e-mail address; and/or telephone numbers;
- **educational background:** details of the schools and universities you have attended; any diplomas, certifications or other qualifications you have achieved; and/or the grades or scores you have obtained;
- **work history:** your previous professional experience; details of the responsibilities you have held; the contents of your curriculum vitae (CV); and/or your current salary and expectations; and
- **other:** your photograph; details of any previous position you have applied for at the Firm or at one of its affiliates and the outcome of your application; details of any of your interests, preferences or requirements that you tell us about as part of your application; your responses to any specific competency questions we may ask you during the recruitment process; your scores in any tests we may ask you to take; any details about your socio-economic background or any other contextual data you may provide as part of your application; CCTV footage of you when you attend our offices.

If we make you a conditional offer of employment (other than a Vacation Scheme placement), we will also carry out **pre-employment screening** checks which will involve a media search, collecting evidence of your right to work in the UK, verifying your identity, education and professional memberships and basic criminal and credit records checks. The information we collect will include a copy of your passport, proof of your address and details of any unspent criminal convictions you may have. We will also contact your referees to obtain references.

We won't typically ask you to provide us with sensitive personal information as part of the recruitment process. However you may choose to provide health or other sensitive information to us if you consider it to be relevant to your application, or we may need to ask you for such information to meet our legal or regulatory obligations. For example, where we have offered you employment, we have a legal obligation to carry out pre-employment screening checks and criminal and credit records checks.

Where we have a legal obligation to collect your Personal Information and you fail to provide the Personal Information requested, we may not be able to progress your application. We will notify you if this is the case at the time of our request.

## How and why we use your Personal Information

We collect and use your Personal Information for the following purposes (the “**recruitment-related purposes**”):

- enabling you to access the viRecruit portal on [the Firm's website](#) and submit an application to us;
- assessing your application and verifying your suitability for a particular role;
- contacting you and communicating information to you about the recruitment process and any assessments, interviews or similar activities we may ask you to participate in for the purpose of your application;
- to ensure that we can accommodate any access requirements you may have or make any reasonable adjustments for you during the recruitment process;
- where applicable, to review your application in the context of your socio-economic background and other contextual information;
- in order to identify you in the future if you apply for another position at the Firm or at one of our affiliates; and
- where applicable, in order to establish a contract of employment with you.

In addition, we use CCTV in our premises for the purposes of detecting and investigating crime, gross misconduct, safety incidents or unauthorised access to our premises or restricted areas.

## Our legal grounds for processing

The lawful basis that we usually rely on for processing your Personal Information is that the processing is necessary to perform a contract with you, or to take steps at your request before entering into a contract with you.

If you provide us with any Personal Information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is that it is necessary to comply with our legal obligations under the Act.

The lawful basis we rely on to process any Personal Information you provide as part of your application which is “special category” data, such as health information, is that it is necessary pursuant to our obligations under relevant employment law.

We carry out pre-employment screening checks as we need to do so to comply with our legal obligations under applicable anti-money laundering legislation.

The lawful basis we rely on to process your socio-economic and other contextual information is consent. You have the right to withdraw your consent at any time by emailing [dataprivacy@cghs.com](mailto:dataprivacy@cghs.com).

## Who we share your Personal Information with

The Firm operates on a worldwide, integrated basis and, depending on the role you apply for, we may need to share your Personal Information with personnel working for one of our affiliates. For example, we may do this if the role you apply for is within an international team or if the systems on which we store your Personal Information require maintenance.

We will also share your Personal Information with any recruitment agency which referred you to us or submitted your application to us.

If you have applied for an Insight Day, Vacation Scheme or Direct Training Contract, and you have provided your consent, we will share your email address, postcode, examination grades, education history, any "contextual information" you provide to us (i.e. information about your socio-economic circumstances, personal circumstances and parental occupation) and the fact that you have applied to the Firm with our contextual recruitment system provider, **Rare**. This is for the purpose of Rare conducting a contextual assessment of you on our behalf.

If your application is successful, and we offer you employment, we will share your name, email address, contact number, a copy of your CV, a copy of your passport and proof of your address dated in the last 3 months with our pre-employment screening provider, **Vero**.

We will not share your Personal Information with any other third party unless: (i) you have provided your consent; or (ii) it is required by law; or (iii) it is required by a supervisory authority, or a government or regulatory body having jurisdiction over the Firm or one of its affiliates.

## Whether your Personal Information is transferred overseas

In order to transfer your Personal Information to one of our affiliates we will need to transfer your Personal Information overseas. We have entered into an intra-group contract with our affiliates, incorporating standard data protection clauses recognised under UK data protection law, to ensure that your Personal Information will continue to be protected to the same standard once transferred. For a complete list of locations in which we practise, please see the [Firm's website](#).

We keep CCTV footage for 90 days and all other Personal Information for no longer than 2 years from the date of your application unless (i) your application is successful, in which case we will transfer it to your personnel file and issue you with a new privacy notice; (ii) we need to keep it for a longer period for legal or regulatory reasons; or (iii) in the event of a legal claim, defence, action or dispute between us.

## How long we will keep your Personal Information for

Access to your Personal Information is restricted to those individuals within the Firm or one of its affiliates who need to access it for one of the recruitment-related purposes or, in the case of our CCTV footage, for the purposes of ensuring the security of our staff or premises.

## Your Data Protection rights

We rely on you to provide accurate, complete and current Personal Information to us.

Under data protection law, you have rights including:

- **Access** – The right to ask us for copies of your Personal Information.
- **Rectification** – The right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Erasure** – The right to ask us to erase your Personal Information, in certain limited circumstances.
- **Restriction** – The right to ask us to limit the way in which we process your Personal Information, in certain circumstances.
- **Objection** – The right to object to the processing of your Personal Information, in certain circumstances.
- **Data portability** – The right to ask that we transfer the Personal Information you have given us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. We may ask you for personal information to enable us to identify you.

## How to contact us

If you would like to exercise any of your Data Protection Rights or if you have any concerns about our use of your Personal Information, you may contact us using the contact details below:

Contact: **Cleary Gottlieb Steen & Hamilton LLP – Recruiting Data Privacy**

Address: **2 London Wall Place, London EC2Y 5AU, UK**

Telephone: **+44 20 7614 2200**

E-mail: **dataprivacy@cgsh.com**

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your Personal Information:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

