



Cartmell Shepherd Solicitors

UK GDPR Candidate Privacy Notice

May 2026

1 What is the purpose of this document?

- 1.1 Cartmell Shepherd Limited (the Company) is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment process, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

2 Data protection principles

- 2.1 We will comply with data protection law and principles, which means that your data will be:
- 2.1.1 Used lawfully, fairly and in a transparent way.
 - 2.1.2 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - 2.1.3 Relevant to the purposes we have told you about and limited only to those purposes.
 - 2.1.4 Accurate and kept up to date.
 - 2.1.5 Kept only as long as necessary for the purposes we have told you about.
 - 2.1.6 Kept securely.

3 Who is your personal information collected from?

- 3.1 We collect personal information about candidates from the following sources:
- 3.1.1 You, the candidate.
 - 3.1.2 Recruitment agencies.
 - 3.1.3 Disclosure and Barring Service in respect of criminal convictions.
 - 3.1.4 Your named referees.
- 3.2 The following data from third parties is from a publicly accessible source: internet content including social media platforms and web browsers.

4 The kind of information we hold about you

- 4.1 In connection with your application for work with us, we will collect, store and use the following categories of personal information about you:
- 4.1.1 The information you have provided to us in your curriculum vitae and covering letter.

- 4.1.2 Any information you provide to us during your interview and throughout the interview process.
 - 4.1.3 Information obtained from sources other than yourself previously referred to in this notice.
- 4.2 This may involve us collecting, storing and using the following types of more sensitive personal information:
 - 4.2.1 Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
 - 4.2.2 Information about your health, including any medical condition, health and sickness records.
 - 4.2.3 Information about criminal convictions and offences.

5 How we will use information about you

- 5.1 We will use the personal information we collect about you to:
 - 5.1.1 Assess your skills, qualifications, and suitability for the role.
 - 5.1.2 Carry out background and reference checks, where applicable.
 - 5.1.3 Communicate with you about the recruitment process.
 - 5.1.4 Keep records related to our hiring processes.
 - 5.1.5 Comply with legal or regulatory requirements.
- 5.2 It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role.
- 5.3 We may sometimes use your personal data because we have a recognised legitimate interest. Where we rely on a recognised legitimate interest, we will ensure the use is strictly necessary and only use or share the minimum data required.
- 5.4 We also need to process your personal information to decide whether to enter into a contract of employment with you.
- 5.5 Having received your CV and covering letter we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role we will then take up references and carry out any other necessary checks before confirming your appointment.
- 5.6 Before we use your personal data for any new purpose, we will ensure the processing is fair and lawful. In particular, we will confirm that an appropriate lawful basis applies to the new purpose and (where relevant) that any additional requirements for special category data or criminal offence data

are met. We will carefully consider whether any new use is compatible with the original purpose for which your data was collected.

- 5.7 We will not use your personal data in ways that are unexpected, unfair, or that could have an unjustified negative impact on you.
- 5.8 In certain circumstances, the law treats further processing as compatible without requiring a full compatibility assessment, for example, where processing is carried out for archiving in the public interest, scientific or historical research, or statistical purposes, provided appropriate safeguards are in place.
- 5.9 Where we do intend to use your data for a new purpose, we will inform you and provide any relevant information before doing so. In some cases, you will have the right to object to that use, and we will make you aware of this right whenever it applies.

6 If you fail to provide personal information

- 6.1 If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

7 How we use particularly sensitive personal information

- 7.1 Where appropriate we will use your particularly sensitive personal information in the following ways:
 - 7.1.1 We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.
 - 7.1.2 We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

8 Information about criminal convictions

- 8.1 Criminal records information will be processed in accordance with the Company's Criminal records information policy.

9 Automated decision-making

- 9.1 Automated decision-making is the process of making decisions by automated means, with or without any human involvement.
- 9.2 We do not make decisions about you based solely on automated processing that would have legal, or similarly significant, effects for you. We will notify you if this position changes.

10 Cookies and similar technologies

- 10.1 Our website uses cookies and similar technologies. Some cookies are essential for functionality and security. We also use cookies (including those set by trusted third parties) to help us understand how candidates use our recruitment pages, improve the website, and measure the effectiveness of our recruitment activity. For analytics and optimisation cookies, we provide clear information and an easy way to opt out through our cookie settings. Some cookies, particularly those set by third parties for advertising or tracking purposes, require your consent before we place them on your device. You can change your cookie preferences at any time through our cookie settings.

11 Data sharing

- 11.1 Why might you share my personal information with third parties?
- 11.2 We will only share your personal information with third parties for the purposes of processing your application if necessary. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

12 Cross-border data transfers

- 12.1 We will not transfer your personal information outside the UK.

13 Data security

- 13.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 13.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

14 Data retention

How long will you use my information for?

- 14.1 We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment process in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.
- 14.2 If we would like to retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

15 Rights of access, rectification, erasure, objection, restriction and data portability

15.1 Under certain circumstances, by law you have the right to:

- 15.1.1 Request access to your personal information (commonly known as making a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We will conduct a reasonable and proportionate search for your personal information.
- 15.1.2 Request rectification of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 15.1.3 Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 15.1.4 Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 15.1.5 Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 15.1.6 Request the transfer of your personal information to another party.
- 15.1.7 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our data protection officer (DPO) whose contact details are available from our website.

16 Right to withdraw

16.1 When you applied for this role, you provided consent for us to process your personal information for the purposes of the recruitment process. You have the right to withdraw that consent at any time. To withdraw your consent, please contact our data protection officer (DPO) whose contact details are available from our website. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

17 Questions or complaints

- 17.1 If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our data protection officer (DPO) who has been appointed to oversee compliance with this privacy notice and whose contact details are available from our website.
- 17.2 You have the right to complain to us if you consider that there has been an infringement of your rights in relation to your personal data.

17.3 You can submit a complaint using the following channels:

17.3.1 Email

17.3.2 Post

17.3.3 Telephone

17.4 When we receive a data protection complaint, we will:

17.4.1 Acknowledge receipt no later than 30 days from receiving it.

17.4.2 Take appropriate steps to respond without undue delay, which may include making enquiries into the subject matter of the complaint and, where appropriate, keeping you informed about the progress of our handling of the complaint.

17.4.3 Inform you of the outcome without undue delay.

17.4.4 You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), who is responsible for data protection issues in the UK and whose contact details are available from their website.