

Privacy Notice – Job Applicants

1. Who we are

Data Controller:

The data controller is the relevant Lulworth Estate company recruiting for the vacancy. References to 'The Lulworth Estate' refer collectively to the Lulworth Estate group of companies and associated entities.

Data Protection Contact:

The Lulworth Estate has not appointed a statutory Data Protection Officer. Data protection matters are managed through our Data Protection Contact at:

Email: gdpr@lulworth.com

If you have any questions regarding the processing of your personal data or wish to exercise your rights, please contact us using the above email address.

If you believe your personal data has been compromised or misused please contact us immediately using the details above.

Responsible Owner: Human Resources

2. Purpose of this notice

This notice explains how we collect and use personal data during the recruitment process.

3. What personal data we collect

We may collect:

- Contact details and identification information
- Employment history, qualifications, and experience
- References and background checks
- Right-to-work documentation
- Information relating to immigration status and eligibility to work in the UK
- Criminal record information (where required)
- Health information (for reasonable adjustments)
- Interview notes
- Correspondence relating to applications
- Salary expectations
- Assessment and test results

- Recruitment agency information
 - Professional memberships and certifications
 - Driving licence details (where relevant)
 - Eligibility to work in the UK documentation
 - Equal opportunities monitoring information (where provided)
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4. How we collect your data

We collect data from:

- You directly (applications, CVs)
 - Recruitment agencies
 - Referees and previous employers
 - DBS and background check providers
 - Professional networking platforms (such as LinkedIn) where information is made publicly available and relevant to recruitment
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5. Why we use your data (lawful basis)

Purpose	Lawful Basis
Recruitment and selection activities	Contract (steps prior to entering a contract)
Verification of qualifications, experience and references	Legitimate interests
Right to work checks	Legal obligation
Equal opportunities monitoring	Legal obligation and substantial public interest where applicable
Recruitment records	Legitimate interests

6. Our legitimate interests

Where we rely on legitimate interests, these include:

- Assessing applicants' suitability for employment
- Complying with internal governance requirements and maintaining recruitment records.
- Managing recruitment processes
- Verifying qualifications and experience
- Ensuring workforce planning
- Protecting business interests
- Preventing fraud and misrepresentation

- Defending legal claims
 - Ensuring the safety and security of the Estate
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7. Special category data

Where necessary during recruitment we may process special category personal data including health information, diversity monitoring information and information required to facilitate reasonable adjustments.

Such processing is undertaken under one or more of the following conditions:

- Article 9(2)(b): Employment, social security and social protection law
- Article 9(2)(f): Establishment, exercise and defence of legal claims
- Article 9(2)(h): Assessment of the working capacity of employees and occupational health purposes.

Criminal offence data, including DBS information where applicable, is processed in accordance with Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018.

8. Who we share your data with

We may share data with:

- Recruitment agencies.
- DBS and background screening providers
- Occupational health providers.
- Professional advisers.
- Legal advisers.
- IT service providers.
- External recruitment platform providers.
- HM Revenue & Customs (HMRC)
- Regulatory bodies and law enforcement agencies where required by law,
- Group companies within The Lulworth Estate where necessary for recruitment administration, workforce planning and management reporting.

We may also share personal data with carefully selected service providers acting on our behalf where this is necessary to operate our business, administer employment, provide employee benefits, maintain IT systems, meet legal obligations or protect our legitimate interests.

9. International transfers

We do not routinely transfer data outside the UK. Where suppliers process data outside the UK, we ensure appropriate safeguards are in place, including adequacy regulations, the UK International Data Transfer Agreement (IDTA), or other approved transfer mechanisms

10. How we protect your data

We use appropriate technical and organisational measures, including:

- Restricted access (role-based permissions)
 - Secure IT systems and password protection
 - Locked storage for paper records
 - Staff training on data protection
 - Secure document retention and destruction procedures
 - Audit logging where appropriate
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11. How long we keep your data

Retention periods may vary depending on legal requirements, regulatory obligations, ongoing claims, litigation, insurance requirements or the need to establish, exercise or defend legal claims.

Record Type	Typical Retention
Successful Applicants	Transferred to employee file and retained in accordance with the Employee Privacy Notice.
Recruitment records (unsuccessful)	12 months
DBS and background screening records	As required by applicable legal and regulatory requirements.
Interview notes	12 months
Accident records	Up to 6 years (or longer where required)
Right-to-work checks	Employment + 2 years
CCTV footage	Typically, 30–90 days unless required for investigation

Certain records may be retained for longer where required by law, ongoing litigation, regulatory investigations or insurance requirements.

12. Is providing your data mandatory?

Providing personal data is generally necessary in order for us to assess your suitability for employment, progress applications and comply with legal obligations.

Failure to provide requested information may prevent us from progressing your application or where applicable entering into an employment contract.

13. Your rights

Standard UK GDPR rights apply:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Rights regarding automated decision-making

Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Requests relating to your data protection rights should be directed to: GDPR@lulworth.com

14. Complaints

We encourage applicants to contact us first if they have concerns regarding the processing of their personal data.

You also have the right to lodge a complaint with the ICO:

- Website: www.ico.org.uk
 - Helpline: 0303 123 1113
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15. Automated decision-making

We do not make recruitment decisions based solely on automated processing. Any decisions relating to applications are subject to appropriate human review.

16. Changes to this notice

This notice may be updated periodically to reflect changes in legislation, regulatory guidance, recruitment practices, service providers or business operations.

17. Document control

- Version: 2.1
- Owner: Human Resources Department
- Review Cycle: Annual