

## Canary Wharf Group Privacy Notice for Candidates

### 1. Introduction

We, **Canary Wharf Group plc and all associated group companies (“Canary Wharf Group”)** of One Canada Square, Canary Wharf, London, E14 5AB, the **Data Controller**, are committed to respecting the privacy of individuals. This notice outlines how we collect and use your personal information, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

We have provided this privacy notice statement to help you understand how we collect, use and protect your information when you apply for a job or for work experience at Canary Wharf Group.

Please also refer to our general privacy notice to help you understand how we collect, use and protect your information when you visit [www.canarywharf.com](http://www.canarywharf.com) and any other Canary Wharf Group websites and when you visit the Canary Wharf estate in person.

The term “personal information” in this notice refers to information that does or is capable of identifying you as an individual, for the purpose of applicable data protection legislation and privacy legislation in force from time to time in the UK. We can provide you with further details of the relevant legislation if you need it, but this includes the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

### 2. Why do we collect personal information about you and what lawful basis for processing do we rely on?

Our purpose for processing information in connection with your application for work experience or employment with Canary Wharf Group is to assess your suitability for the role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract. Where applicable, this includes a work experience relationship rather than a formal employment contract.

If you provide us with any information about reasonable adjustments that you require under the Equality Act 2010 the lawful basis we rely on for processing this information is article 6(1)(c) of the UK GDPR to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA 2018 which again relates to processing for employment purposes. This data is used monitor the fairness of Canary Wharf Group’s recruitment process and to allow us to provide you with any necessary support when you visit Canary Wharf.

We process information about applicant criminal convictions and offences. The lawful basis we rely on to process this data are Article 6(1)(e) of the UK GDPR for the performance of a task in the public interest. In addition, we rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a) of the DPA 2018.

### **3. What Personal Information may we collect about you?**

We only ask for details that will genuinely help us to assist you with the recruitment process and which will help us perform our obligations as a responsible employer. You don't have to provide what we ask for, but if you decide not to provide relevant information this may affect your application. This will not apply to equal opportunities data which is not mandatory and if you don't provide it, this won't affect your application.

It is important to ensure that all the information you provide is accurate and any offer of work experience or employment will be dependent on this. The information you are invited to provide on our application form includes your name and contact details as well as details of your experience, education and qualifications.

We also ask about demographics such as gender age, nationality, other interests as well as questions to support out social mobility programme.

The special category information that we ask for may include data relating to your mental and physical health, medication/treatment received, race or ethnic origin, data about sexual orientation and religious beliefs.

We also rely on information collected during interviews and/or telephone conversations and information provided by your nominated referees.

Data about any spent or unspent convictions and/or cautions may also be requested to assess your suitability for a job role or for provision of access to sites where enhanced security is required.

Other operational personal data created, obtained, or otherwise processed in the course of carrying out our recruitment business activities, will include CCTV footage, visitor logs and visitor pass data and potentially logs of accidents and injuries.

Our recruitment team will have access to all this information and other details you provide with your application.

To ensure fairness and impartiality, staff outside our recruitment team, including hiring managers, are not provided with equal opportunity or other special category data in a way that can identify you.

### **4. How do we collect your personal information?**

We collect personal information in three primary ways:

(i) *Personal information that you, the candidate, provide to us.*

There are numerous ways you can share your information with us. These may include:

- Entering your details on the Careers Page on our website;
- Emailing your CV to a member of the recruitment team; or
- Applying for jobs through our website.

(ii) *Personal information that we receive from other sources.*

We may receive personal information about you from other sources. Depending on the relevant circumstances, these may include personal information received in the following situations:

- Your referees may disclose personal information about you; and,
- We may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job sites; and,

(iii) *Personal information that we collect automatically.*

To the extent that you access our website or read or click on an email from us, we may (with your consent) also collect your data automatically through cookies or through you providing it to us. Please see our cookie policy on our websites.

## **5. How do we use your Personal Information?**

We use your information to:

- Process your application and keep you informed throughout the recruitment process.
- Verify your identity.
- Assess your skills and qualifications against the criteria for the job you have applied for.
- Contact your nominated references.
- Keep you informed of new vacancies within Canary Wharf Group which you may be interested in.
- Contact you for feedback on your experience in order to help us improve the services we provide to our candidates.
- Processing of information about race, ethnic origin, religious beliefs or sexual orientation to ensure fairness and equality in our recruitment process and to comply with our equal opportunity; obligations, monitor the diversity of recruitment process and for statistical and research purposes.
- Processing of health information with regards to your physical or mental wellbeing, where the processing is undertaken for the purpose of our assessment of your suitability for job roles or working capacity, or for the provision of medical products or medical devices, to assist you when attending Canary Wharf Group sites, or where processing is necessary for the purpose of obligations or rights under employment, social security or social protection law.

If you are a successful applicant, your data will be processed in accordance with our obligations as an employer and form part of your personnel file. Further details can be found in our privacy notice for employees and contractors which is available on our websites.

## **6. Who has access to your Personal Information?**

Your information will be processed by employees of Canary Wharf Group in order to fulfil our obligations to you as outlined in this notice. During the recruitment or selection process equal opportunity or other special category data is only made available to our recruitment team.

However, if you are selected for work experience or employed, where necessary, we may also share your details with third parties including:

- Contractors working on behalf of or in partnership with Canary Wharf Group.
- Our third-party suppliers/service providers who perform functions on our behalf under contract, support our systems, operations and processes.
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this information, for example where processes and systems are being compliance assessed by Canary Wharf Group's corporate auditors or their representatives.
- Law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, the apprehension or prosecution of offenders, and the assessment or collection of tax.
- If we merge with or are acquired by another business or company in the future, we may share your personal information with the (prospective) new owners of the business or company.

## **7. Information security and International Transfers**

Canary Wharf Group is committed to being transparent and taking all reasonable and appropriate steps to keep your personal information secure and to protect it from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

We have a strict selection process when it comes to our suppliers/ service providers and our contracts to ensure your personal information is stored and transferred in a way which is secure.

We operate in the UK and do not transfer personal information to third countries as a matter of practice. In the event that we engage companies that do transfer personal information outside the UK, we will take all reasonable steps to ensure that your personal data is processed securely. We will only transfer personal information to other countries in accordance with UK GDPR rules and in a way that provides equivalent safeguards in relation to your personal information.

## **8. How long will you keep my Personal Information?**

Information is only kept as long as necessary for the period it is required. When deciding how long we keep your information we take into account any minimum retention requirements set out in law. If your application is unsuccessful then your data will be deleted by us after 6 months. Please note CCTV footage is held securely for 28 days (unless there are grounds for preserving it) and data relating to visitor passes is held for 39 months following pass card or QR code deactivation. Please contact [dataprotection@canarywharf.com](mailto:dataprotection@canarywharf.com) if you require further information.

## **9. What rights do I have with regards to my Personal Information?**

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure, we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest)
- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.
- The right to data portability. You have the right to request that we transfer your data to another controller in appropriate circumstances.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- The right to withdraw consent at any time, if we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within one month of receiving your request.

To exercise your rights please do so by contacting us using the email or postal address at the end of this notice.

## **10. Consent**

Where we need your consent to hold your information, we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject.

Where we do rely on consent you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent, we will immediately cease using any personal information obtained and processed under that consent unless we have some other legal right or obligation to continue to use it.

As explained in section 2, we may rely on our legal or contractual obligations or our legitimate interests to process your personal information, rather than your explicit consent.

## **11. Canary Wharf Group's Use of Cookies**

Canary Wharf Group utilises cookies to enhance your browsing experience, details can be found in our Cookies Policy on our websites.

## **12. What can I do if I'm not satisfied with how my Personal Information is processed?**

We aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

Alternatively, it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK the Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or call them on 0303 123 1113, or write to Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF.

If you have any queries in relation to this notice, or need more information please do not hesitate to contact us at: [dataprotection@canarywharf.com](mailto:dataprotection@canarywharf.com)

Or by writing to us at:

Data Protection  
Canary Wharf Group  
One Canada Square  
Canary Wharf  
London  
E14 5AB

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