

# Privacy Notice to Job Applicants

## 1 Introduction

We take your Data Protection seriously and in accordance with the UK Data Protection Act 2018 and UK GDPR (Regulations), we have reviewed our policies, processes and security procedures to ensure compliance with the new regulations. This privacy notice is to inform you, a job applicant, of the types of data we process about you, the reasons for processing your data, the lawful basis for processing, your rights and the retention periods of your data.

## 2 Scope

This Privacy Notice applies to all previous, current and future job applicants of Lucida Medical Ltd. If you have any questions about your data or how we handle it, please contact us by email at the following address:

[dpo@lucidamedical.com](mailto:dpo@lucidamedical.com)

## 3 What Personal Data We Collect

As a job applicant we collect information about you, which includes:

- your name, address and contact details, including email address and telephone number
- details of your qualifications, skills, experience and employment history
- information about your current level of remuneration, including benefit entitlements
- whether or not you have a disability for which Lucida Medical needs to make reasonable adjustments during the recruitment process
- information about your entitlement to work in the UK

## 4 How Data is Collected and Stored

We may collect information from:

- your application
- your CV
- your passport or other identity documents
- interviews or other forms of assessment, including online tests

We may also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks. We will only seek information from third parties once a job offer to you has been made.

The places where your data will be stored include:

- Your application record
- HR Management systems
- Other IT systems (including email)

## 5 Why We Need to Process Personal Data

We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

We may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out our legal obligations and exercise specific rights in relation to employment.

## 6 Access to Your Data

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references. We will not transfer your data outside the European Economic Area.

## 7 How We Protect Your Data

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## 8 How Long We Keep Your Data

If your application for employment is unsuccessful, we will hold your data on file for 2 years after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held are explained in the Employee Privacy Notice.

## 9 Your Rights

As a data subject, you can:

- access and obtain a copy of your data on request
- require us to change incorrect or incomplete data
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing

To exercise your rights under the Data Protection Act 2018 please contact our Data Protection Owner at [dpo@lucidamedical.com](mailto:dpo@lucidamedical.com).

If you believe that Lucida Medical has not complied with your data protection rights, you can complain to the Information Commissioner.

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly, or at all.

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