

1. Controller

LAMP Services Limited *is the Controller under the EU General Data Protection Regulation (EU GDPR).*
LAMP Services Limited *is incorporated in England, company registration number 04967967.*

2. Contact details of the Controller

You may contact LAMP Services Limited to make requests, for example to exercise your data protection rights, to provide positive feedback or to make complaints by writing to us at

*Chester House
Harlands Road
Haywards Heath
West Sussex
RH16 1LR*

or by emailing our Data Protection Officer at dpo@lampinsurance.com.

3. Contact details of Controller including Data Protection Officer

LAMP Services Limited has appointed a Data Protection Officer (DPO). You may contact the DPO to make requests, for example to exercise your data protection rights, to provide positive feedback or to make complaints by writing to the Data Protection Officer at Chester House, Harlands Road, Haywards Heath, West Sussex, RH16 1LR

or by emailing our Data Protection Officer at dpo@lampinsurance.com.

4. Purposes of the processing

LAMP Services Limited *processes your personal for general recruitment purposes, specifically:*

- *To assess your suitability for a role you have applied for*
- *To securely destroy unsolicited applications*

- *To shortlist*
- *To interview*
- *To make conditional offers*
- *To verify application details when an offer has been accepted*

When you apply for a role that has been advertised, we will use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We'll use the other information you provide to assess your suitability for the role.

5. Legal basis for the processing

The legal basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

The legal 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 ethnic information is article 9(2)(b) of the GDPR, which also relates to our obligations in employment and the safeguarding of your fundamental rights and article 9(2)(h) for assessing your work capacity as an employee. And Schedule 1 part 1(1) and (2)(a) and (b) of the DPA2018 which relates to processing for employment, the assessment of your working capacity and preventative or occupational medicine.

6. Categories of personal data

LAMP Services limited will not collect more information than is necessary to fulfil its stated purpose and will not keep it any longer than is necessary. With respect to advertised roles, the information asked for is used to assess your suitability for employment. You do not have to provide what LAMP asks for but it may affect your application if you don't.

Unsolicited Applications

LAMP Services Limited does not normally consider unsolicited applications. Where unsolicited CVs are received from agencies, these will normally be securely destroyed upon receipt.

Where unsolicited CVs are received directly from an individual, LAMP Services Limited will consider if there is current suitable role, or if the CV looks suitable for the future, and if so will seek agreement and permission from the individual to keep the CV on file for any future vacancies. In the absence of

such permission being forthcoming in a timely manner, the CV will be securely destroyed within one month.

Applications

LAMP Services Limited may receive your personal data and special categories of personal data either directly or, more usually, from a third party (e.g. a recruitment agency) for the recruitment purposes set out above. The categories of personal data may include:

- *Name and contact details*
- *Previous experience*
- *Education*
- *Referees*
- *Answers to questions relevant to the role*

Our recruitment team will have access to all this information.

Conditional Offer

If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks before commencing employment with us. We must confirm the identity of our staff and their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity and reliability.

You must therefore provide upon request:

- *proof of your identity*
- *Details of two referees, who we will contact directly to obtain references using the details given by you following our conditional offer*
- *A questionnaire which will be sent to you with our conditional offer, to confirm your fitness to undertake the role you have been offered*
- *proof of your qualifications (if requested)*
- *a criminal records declaration to declare any unspent convictions (if requested)*
- *your email address*

7. Any recipient or categories of recipients of your personal data

Within LAMP Services Limited, only those members of the workforce who have a valid business 'need to know' will be granted access to your personal data. Further, individual team members will only be given access to the part of your data that they need to perform their roles. Our recruitment team will have access to your application. Your data will be used by the recruitment team to:

- *provide human resources services to you related to recruitment*
- *decide whether to shortlist your application*
- *prepare for and carry out the interview process*
- *to make a decision whether to employ you including contacting you to inform you about our decision*
- *where relevant, to make a conditional offer*
- *where relevant, to verify the details of your application*
- *where relevant, to provide a transition for you to become an employee.*

NB When you become an employee, the LAMP Services Privacy Notice will apply.

Externally, your data may be shared with the external organisations / individuals for the following purposes, as set out below:

- *recruitment agencies - to inform them about the recruitment decision*
- *referees – to obtain references as part of the recruitment process*
- *to allow a criminal records check and credit check (if applicable) or sanctions search to be performed.*

Wherever possible those data shared are either anonymised and/or minimised and only those with a valid business 'need to know' in the receiving organisation are granted access.

8. Details of transfers to third country and safeguards

Your data is not transferred outside the European Economic Area.

9. Retention period or criteria used to determine the retention period

Your personal data will be kept for as long as is necessary for LAMP Services Limited to meet its legal obligations with respect to all aspects of employment.

- ***Unsolicited applications*** will usually be destroyed immediately as a matter of best practice, unless, by agreement with the applicant their details can be kept on file for consideration for future roles.
- ***Successful recruitment candidate information*** (including third party referee details provided by the applicant) will be securely destroyed 6 months

after termination of employment

- **Unsuccessful recruitment candidate information** (including third party referee details provided by the applicant) will be destroyed 6 months after the last action related to that individual (usually confirmation that their application has been unsuccessful) unless, by agreement with the applicant their details can be kept on file for consideration for future roles.
- **If the unsuccessful applicant asks for their personal data to be kept**, those data will be deleted after 2 years from the unsuccessful application or before if requested by the applicant.

10. The existence of each of data subject rights

You have the right to exercise the following rights under EU data protection law. Please contact us using the contact details set out above if you wish to exercise any of these rights:

- **Transparency** – we must provide you with all the information set out in this privacy notice in a concise, transparent, intelligible and easily accessible form, using clear and plain language, so that you may understand how and why we process your data and what your rights are. We must keep you informed in timely manner about our progress in responding to requests from you to access your rights under data protection law.
- **Rights of access by the data subject** – you have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, to access to the personal data and the following information:
- **Right to rectification** – you have the right to have the personal data concerning yourself rectified without undue delay if it not accurate. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by providing a supplementary statement.
- **Right to erasure ('right to be forgotten')** – In some limited circumstances, you may have the right to obtain from us the erasure of your personal data without undue delay, when and if:
 - a. Processing your personal data is no longer necessary in relation to the purposes for which your data were collected
 - b. Where you withdraw consent for processing, but only if consent was the legal basis relied upon for that processing
 - c. You object to processing and there are no overriding legitimate grounds for the processing or where you withdraw your consent to marketing. NB This does not apply to employees or former employees or applicants where we have a legal obligation to retain your data.
 - d. Your personal data has been unlawfully processed
 - e. Your personal data has to be erased to comply with a legal obligation to which the Controller is subject
 - f. Your personal data has been collected in relation to the offer of information society services to children
- **Right to restriction of processing** – In some limited circumstances you have the right to request that the processing of your personal data is

restricted, in some cases for a limited time only, specifically when:

- a. You are contesting the accuracy of your personal data while we verify its accuracy or correct it*
- b. The processing is unlawful and you oppose the erasure of your data;*
- c. Where we no longer need your personal data for the purposes for which it was obtained but where you require the data for the establishment, exercise or defence of legal claims*
- d. Where you have objected to the processing of your data pending the verification whether legitimate grounds of the Controller override your interests.*

You have the right to be informed by the Controller before the restriction of processing is lifted

- ***Notification obligation regarding rectification or erasure of personal data or restriction of processing – We will let you know when the following things happen, unless it proves impossible or disproportionate to do so:***

- a. When we have rectified your data*
- b. When we have erased your personal data*
- c. When we have restricted the processing of your personal data*
- d. When we intend to lift any restriction to the processing of your personal data*

We will also advise you about any recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort

- ***Right to data portability*** – Upon your request and where the legal basis for processing your personal data is ‘consent’ or ‘contract’, we will provide you with a copy of your personal data that you have provided to us and which are processed by automated means, in a structured, commonly used and machine-readable format. Upon your request and where technically feasible, we will also transmit those data to another data controller.
- ***Right to object*** – In some limited circumstances, you have the right to object to our processing of your personal data. When certain conditions are met we, as Controller, will no longer process your personal data. This right can be exercised only when:
 - a. Either the processing is necessary for the performance of a task carried out in the public interest or processing is necessary for the purposes of our legitimate interests (including profiling), but where we cannot demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or where processing is necessary for the establishments, exercise or defence of legal claims*
 - b. Processing for direct marketing purposes, including profiling*

When personal data are processed for scientific or historical research purposes or statistic purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest.

- **Automated decision-making, including profiling** – *You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significant effects. At the current time, LAMP Services Limited does not perform automated decision making or profiling.*

11. The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint about us with the supervisory authority for data protection. In the United Kingdom, the Supervisory Authority is:

The Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate)

12. The source your personal data originates from and whether it came from publicly accessible records.

The data we hold about you does not originate from publicly accessible records. If you have not provided us with your personal data directly, we have obtained it from an appointed recruitment agency or service.

13. Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data

LAMP Services Limited has a legal obligation to perform checks for employment purposes for some roles. Failing to do so would be a breach of the law.

14. The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences

LAMP Services Limited does not currently perform automated decision making or profiling relating to recruitment processing.