



JOB APPLICANT PRIVACY NOTICE

Notice Statement

This notice applies to anyone applying for a job at LW Theatres Group Ltd and The Adelphi Theatre Company Limited (“the Company”).

As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice applies to all job applicants, whether they apply for a role directly or indirectly through an employment agency. It is non-contractual.

The Company is a “controller” for the purposes of the data protection laws.

What information does the Company collect?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn’t include anonymised data, i.e. where all identifying particulars have been removed. There are also “special categories” of personal information which requires a higher level of protection because it is of a more sensitive nature. Examples of special categories of personal information are; information about an individual’s racial or ethnic origin, religious or philosophical beliefs, trade union membership, sexual orientation and biometric data.

The Company collects, uses and processes a range of personal information about you during the recruitment process.

This 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;
- information about your entitlement to work in the UK.

The Company may also collect, use and process the following special categories of your personal information during the recruitment process (as applicable):

- whether or not you have a disability for which the Company needs to make reasonable changes during the recruitment process
- information about your gender, marital status, age, sexual orientation, racial or ethnic origin, religious beliefs, education history and caring responsibilities.

The Company collects this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Other than recruitment agencies, the Company will only seek information from third parties once a job offer to you has been made and will inform you that it is doing so.

You are under no statutory or contractual obligation to provide personal information to the Company during the recruitment process.

	Data will be stored in a range of different places, including on your application record, in People management systems and on other IT systems (including email).
Why does the Company process personal data?	<p>The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.</p> <p>In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.</p> <p>The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.</p> <p>The Company processes health information if it needs to make reasonable changes to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.</p> <p>The Company monitors equal opportunities data however only if the data is voluntarily provided by the candidate.</p>
Change of purpose	If your application is unsuccessful, the Company will keep your personal data on file in case there are future employment opportunities for which you may be suited. Your consent can be withdrawn at any time.
Who has access to data?	<p>Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the People 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.</p> <p>The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you.</p> <p>We may also need to share your personal information with a regulator or to otherwise comply with the law.</p> <p>We may share your personal information with third parties where it is necessary to make steps at your request to enter into a contract with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests (or those of a third party).</p> <p>The Company will not transfer your data outside the European Economic Area.</p>
How does the Company protect data?	<p>The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.</p> <p>The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.</p>



<p>For how long does the Company keep data?</p>	<p>If your application for employment is unsuccessful, the Company will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed.</p> <p>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.</p> <p>Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.</p>
<p>Your rights</p>	<p>As a data subject, you have a number of rights. Subject to certain conditions, and in certain circumstances, you have the right to:</p> <ul style="list-style-type: none"> • request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it • request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected • request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected • restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy • object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground • data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes. <p>We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.</p> <p>In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact our the People Team. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.</p> <p>If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.</p>
<p>What if you do not provide personal data?</p>	<p>You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all.</p>
<p>Automated decision-making</p>	<p>Recruitment decisions are not based solely on automated decision-making.</p>

Changes to this Privacy Notice	The Company reserves the right to update or amend this privacy notice at any time.
Contact Us	If you have any queries about this policy notice, or wish to exercise any of the rights above, please contact the People department by emailing recruitment@lwtheatres.co.uk .