



January 2022

# Candidate Privacy Policy

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**Human Resources**

making the **difference**

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<b>Rev</b>	<b>Originator</b>	<b>Approved</b>	<b>Date</b>
1	Katie Smith	Duncan McIndoe	13 <sup>th</sup> January 2022

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## 1 What is the purpose of this document

This candidate privacy notice supports the Turner & Townsend privacy policy. Turner & Townsend Limited is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulations (GDPR).

## 2 Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only for as long as is necessary for the purposes we have told you about
- Kept securely

## 3 The kind of information we hold about you

In connection with your application to work with us, we may collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae/resume and covering letter
- The information you have provided as part of your application, including name, title, address, telephone number, email address, date of birth, employment history and qualifications
- Any information you provide to us during an interview
- Any tests undertaken as part of the application process

We may also collect, store and use the following “special categories” of more sensitive personal information (Diversity Data):

- Information such as gender, race, ethnicity, military veteran status and disability status (only where allowed by applicable law and if you choose to provide it). If you do not wish to provide your personal diversity data, please select the ‘Prefer not to say’ option and we will respect that decision

Following an offer of employment, we may also collect, store, process and use:

- Information about criminal convictions and offences
- Information from credit checks

## 4 How is your personal information collected

We collect personal information about candidates from the following sources:

- You, the candidate
- Recruitment agencies, from which we collect the following categories of data: name, title, address, telephone number, personal email address, employment history and qualifications
- Disclosure and background checks/verification in respect of criminal convictions, if applicable
- Credit checks, if applicable
- Your named references, from whom we collect information relating to your suitability for employment at Turner & Townsend

## 5 How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work or role
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Keep records related to our hiring processes
- Comply with legal or regulatory requirements

It is in our legitimate business interest to decide whether to appoint you.

We also need to process your personal information to decide whether to engage you for employment.

Having received your application, we will process that information to decide whether you meet the basic requirements in order to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role/work. If we decide to offer you the role/work, we may then take up references and/or carry out a criminal record check and/or carry out other checks before confirming your appointment.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

## 6 How we use particularly sensitive personal information

We will use your particularly sensitive personal information (Diversity Data) in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process
- To achieve lawful Diversity & Inclusion objectives, we may (where allowed by law, collect Diversity Data you choose to provide as necessary to comply with applicable employment law obligations, for the overriding legitimate business interests of Turner & Townsend, and for reasons of substantial public interest (such as reviewing and monitoring equality of employment opportunity and treatment of job applicants) or based on your consent (if required by law). We will collect and process Diversity Data only where permitted by law,

subject to any restrictions and additional safeguards as required by law. Diversity Data will not be used to make any hiring decision.

## 7 Data sharing

Turner & Townsend is a global organisation and the personal information we collect, or you provide may be shared and processed with Turner & Townsend entities as necessary for the purposes identified in Section 5.

In particular:

- When you apply for or express interest in seeking employment outside your home country, your personal information will be processed by a responsible Turner & Townsend entity that is located in a country other than your home country
- As part of the assessment of your job application, Turner & Townsend's structure may require that your personal data is transferred to other Turner & Townsend entities outside your home country where individuals involved in the decision-making process for your application are located (e.g., regional HR department, line manager, etc.).

Where legally permissible to process and transfer Diversity Data outside your home country, and if you provide it, your Diversity Data may be shared with other Turner & Townsend entities outside your home country for the purposes identified in Section 6. To the extent possible, we will share such data in an aggregated, anonymised format. We will only share your personal information with the following third parties for the purposes of processing your application, if applicable:

- Applicant tracking software provider
- Disclosure and background checking/verification organisation
- Credit checking organisation
- Third parties performing selection assessments/tests
- Other companies in case of a merger, acquisition, or sale; but only as outlined in Section 5.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 8 Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **9 Data retention**

### **9.1 How long will you use my information for?**

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, or as otherwise legally required.

We retain your personal information so that we can demonstrate, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment process in a fair and transparent way. When we delete/remove your information, we will do so in a way that is secure and appropriate to the nature of the information subject to that deletion/removal.

Certain personal information of successful applicants who become employees will be transferred to our personnel files for record-keeping purposes in accordance with applicable law.

Should there be an opportunity that you may wish to be considered for in the future, your applicant profile may be taken into consideration at any time. Should you wish to be removed from our database, you may elect to do so.

### **9.2 Rights of access, correction, erasure, and restriction**

Under certain circumstances, by law, you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on these grounds. You also have the right to object where we are processing your personal information for direct marketing purposes
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- Request the transfer of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR department in writing ([HRinfo@turntown.com](mailto:HRinfo@turntown.com)).

## **10 Who to contact**

If you have any questions about this privacy notice or how we handle your personal information, please contact the HR department ([HRinfo@turntown.com](mailto:HRinfo@turntown.com)).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. If you are not located in the United Kingdom, you have a right to complain to the supervisory authority for data protection where you live.

## **11 Changes to this policy**

We are a growing global business. We will continue to assess and make changes to this policy from time to time as required. If we make any material changes to this policy, we will make it here and, if the changes are significant, we will provide a more prominent notice.