

Privacy Notice for Work Placement/Work Experience Applicants

What is the purpose of this document?

Howes Percival LLP ("the Firm" or "we") is a "data controller". This means that we are responsible for deciding how we hold and use personal data about you. You are being sent a copy of this privacy notice because you are applying for a work placement with us or are otherwise undertaking work experience with us. It makes you aware of how and why your personal data will be used, namely for the purposes of the work placement/work experience, and how long it will be retained for. It provides you with certain information that must be provided under UK data protection laws, including the Data Protection Act 2018.

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 as long as is necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

In connection with your application for a work placement/work experience with us, we will collect, store, and use the following categories of personal data about you:

- The information you have provided on your application form and any covering letter, including name, title, address, telephone number, personal email address, date of birth, gender, employment

history, education, qualifications, relevant experience, relevant information relating to skills that we are assessing (such as teamwork, organisation etc.).

- The information provided in response to specific requests as part of contextual analysis (more detail on this is set out below, and for clarity you are not required to provide this information and it will not prejudice your application if you choose not to provide it).
- Any information you provide to us during any interview or assessment centre (if applicable).
- If you attend an interview, an assessment centre or are successful in your application, CCTV footage (at our Northampton and/or Leicester and/or Norwich offices) and details from our visitor signing in books at our premises.

During the course of your work placement/work experience with us, we will also process information regarding your use of our systems and email, work that you have undertaken for us, and assessments we may make regarding your abilities and performance (dependant on the type of work placement you are on).

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, status as a refugee or asylum seeker, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.

How is your personal data collected?

We collect personal data from you. We may, on occasion, also collect it from your University or educational establishment and/or any referees or people that requested we provide you with a work placement/work experience.

How we will use Personal Data about you

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

- assess your skills, qualifications, and suitability for a work placement and/or future opportunities within the Firm.
- communicate with you about the work placement.
- keep records related to our work placements.
- comply with legal or regulatory requirements.

- making a decision about future recruitment or appointment, particularly if you are also applying for a training contract.
- If you are applying to work in our Northampton, Leicester or Norwich offices, or attend our Northampton, Leicester or Norwich offices for interview, we have CCTV in operation at those offices. Broad details of our CCTV are below (and full details can be found in our CCTV policy):
 - At our Northampton office we have one camera that covers the entrance to our car park, giving a view of the barrier arm, key pad and intercom, and a second camera that covers the front entrance to our building and an area of the car park which is part of our demise.
 - At our Norwich office, the CCTV monitors the main reception entrance (inner and outer doors), the entrance to the car park and the alleyway from the car park to the main road. It primarily covers those visiting our offices (but is angled so as not to cover members of the public walking by) and cars entering our car park.
 - At our Leicester office, the CCTV monitors the main entrance, the car park, and the full perimeter of the building. It primarily covers those visiting our offices (but is angled so as not to cover members of the public walking by) and cars entering our car park. Again, the CCTV operates for 24 hours a day, and this Data is continuously recorded.

Images from cameras can be viewed from the reception desk at the relevant office and in secure setting by authorised personal for a short period after (save if there is a legal basis for keeping footage long, such as in the event of a criminal investigation).

It is in our legitimate interests to ascertain your suitability for a work placement/work experience and to monitor your performance during it so as to ensure the efficient operation of our business, to ensure our professional obligations are met (such as our obligations of confidentiality to our clients) and since we use our work placement scheme as a means of recruiting potential future trainee solicitors (and for other roles) into our business.

Having received your application form or CV and any covering letter, we will process that information to decide whether you meet the basic requirements to be offered a work placement.

We may need to process your personal data to decide whether to offer you a training contract in the future, if you are also applying for a training contract and perform well on the work placement. Please see our Privacy Notice for Trainee Solicitors Recruitment for more details.

Contextual analysis

As part of assessing your suitability and making decisions regarding offering you a work placement/work experience, we use a third party provider to undertake contextual analysis using information regarding your background. Contextual analysis is used to highlight individuals whose achievements may not otherwise

be fully recognised or understood, and therefore providing that information may enhance your application but your application will not be prejudiced should you choose not to provide it. Contextual analysis is only done with your express consent.

If you fail to provide Personal Data

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. For example, if we require references and you fail to provide us with relevant details, we may not be able to take your application further.

As set out above, should you choose not to consent to contextual analysis and/or do not want to provide some or all of the information requested as part of that analysis, it will not prevent your application proceeding nor will it count against you when we undertake our assessment and make a decision regarding any placement or work experience we may offer.

How we use particularly Sensitive Personal Data

“Special categories” of particularly sensitive personal data require higher levels of protection. This includes the following information: race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life or sexual orientation.

We will use your particularly sensitive personal 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 or during your work placement with us, for example whether adjustments need to be made during the interview, or in the case of trainee applications in relation to the assessment centre or any tests undertaken or whether you need any adjustments whilst undertaking a placement with us.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We also use, only with your express consent, information you provide regarding your background (for example any refugee/asylum seeker status, whether you undertook paid employment during your full-time education, and if you were entitled to free school meals) for the contextual analysis explained above.

Information about Criminal Convictions

For the purposes of your work placement/work experience, we do not envisage that we will require information relating to criminal offences and convictions.

However, should we offer you a training contract, we envisage that we may process information about criminal convictions, for more details, please see our Privacy Notice for Trainee Solicitor Recruitment.

Automated Decision-Making and Profiling

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

We have set out above that we conduct contextual analysis, but only with your consent. This does constitute a form of profiling as it involves collecting information about you and analysing that information to assist with decision making. However, this is only done with your consent and does not produce any significant effects in and of itself, as it forms only a small part of the overall decision making process.

Data Sharing

Why might you share my Personal Data with Third Parties?

If as part of your application for a work placement/work experience, you also apply for a training contract, we may share your relevant personal data with the following third parties for the purposes of processing such application:

- Your recruitment consultant (if you have used one for making your application),
- Those third parties who are contracted to carry out assessments at the assessment centre, including those that carry out the numerical tests on our behalf, currently Informed Assessment Limited,
- Our applicant tracking system, currently the Eploy system provided by ITS Software Systems Ltd),
- Our third party provider who conducts contextual analysis using your background information (only with your express consent), currently Rare Recruitment Limited,
- Any providers of the LPC, GDL or SQE (or equivalent) or other relevant education provider, if funded by the Firm,
- Your chosen referees,
- Any former employers named in your application.

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies and/or the UK data protection laws. We do not allow our third-party service providers to use your personal data for any other purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security

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

Data Retention

How long will you use my Personal Data for?

If you are applying for a work placement and/or a training contract and you are unsuccessful in your application, we will retain your personal data for a period of 9 months after we have communicated our decision to you.

We retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal data in accordance with applicable laws and regulations.

For successful candidates who seek a training contract or other role within the firm and accept an offer of employment with us, we will retain the data for the duration of your employment to the extent that it remains relevant to your employment (and possibly thereafter). Please see the Privacy Notice for Employees, Consultants and Members or the Privacy Notice for Trainee Solicitor Recruitment, as appropriate.

If we wish to retain your personal data on file, on the basis that a further opportunity may arise in the future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal data for a fixed period on that basis.

If you carry out a work placement but do not also apply for a training contract, we will retain your personal data for a period of 6 months following the end of the work placement scheme for that year.

Rights of Access, Correction, Erasure, and Restriction

Your rights in connection with Personal Data

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

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please note that we may need to verify the accuracy of the new personal data that you provide.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below). Please note, however, that we may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data 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 this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data in certain circumstances. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to you or to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our People Manager (Natalie Clarke) in writing.

Right to withdraw Consent

In the limited circumstances where we have relied on your consent for the collection, processing and transfer of your personal data for a specific purpose (which will be rare), you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our People Manager (Natalie Clarke). Once we have received notification that you have withdrawn your consent, we will no longer process your personal data, unless we have a legitimate basis for doing so in law.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. Our DPO is Hannah Steggles, Partner. She can be contacted on 0116 247 3520 or email

hannah.steggles@howespercival.com. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO. 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.

The Firm's Data Protection Officer is responsible for this Notice which was adopted on 8 May 2018 and last updated on 2 February 2026