

## Introduction

John Mills Ltd (ICO registration Z5266132) (“JML”) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact:

John Mills Ltd  
Chiswick Green  
610 Chiswick High Road  
London  
W4 5RU

[Compliance@jmlgroup.co.uk](mailto:Compliance@jmlgroup.co.uk)

UK Customers - 0800 781 7831

Republic of Ireland Customers - 041 978 0003

Unless we inform you otherwise during the recruitment process, JML will be your data controller and will be the company to which you provide your consent for the processing of your personal data.

Our data protection policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

## 1 What information do we collect?

We collect and process personal data about you when you apply for a job with us.

The personal data we process includes:

- ✓ Name;
- ✓ Home address;
- ✓ Email address;
- ✓ Telephone numbers;
- ✓ Date of birth;
- ✓ Marital status;
- ✓ Nationality;
- ✓ National insurance number;
- ✓ Educational and employment history;
- ✓ Other information contained in your CV or other documents or information you submit to us;
- ✓ information from the selection process, e.g. Company Test(s);
- ✓ references and assessments relating to your work for previous employers;
- ✓ medical and financial information (where you provide this to us);
- ✓ information to confirm your identity and right to work, such as a copy of your passport;
- ✓ details of any unspent criminal convictions; and
- ✓ information relating to your feedback on our organisation.
- ✓ With your specific consent, we may ask you for information relating to your ethnicity, gender, nationality, disability, religion, sexual orientation and other diversity-related information.

## 2 What is the source of this information?

We obtain this information directly from you, as well as from third parties such as recruitment agencies, or any background checking companies we use or by asking your former employers with your consent. We may also obtain information from your public profiles available online.

### 3 How do we use this information and what is the legal basis for this use?

We process the personal data listed in paragraph 1 above for the following purposes only in accordance with our legitimate interests:

- ✓ to enable us to comply with our legal and regulatory obligations;
- ✓ to make recruitment decisions;
- ✓ to prevent and detect fraud and other wrongdoing;
- ✓ to establish, exercise or defend our legal rights; and
- ✓ to manage risk;

### 4 With whom and where will we share your personal data?

We may share your personal data with our professional advisors such as our auditors and your personal data may be shared with government authorities and / or law enforcement officials mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data may also be shared with third party service providers (processors) who will process it on behalf of JML for the purposes above. We will only use processors who have demonstrated sufficient guarantees of compliance.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

**We promise we'll never share your details with anyone else.**

### 5 How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

We will keep the personal data connected to your job application (including any interview records) for 6 months from the date of their creation by JML or receipt from you. If your application is successful and you become a member of staff we will provide you with a copy of the Employee Privacy Notice. The retention periods referred to therein will apply to your personal data during your employment.

### 6 Where is my data stored?

The personal data that we collect from you may be transferred to and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the other country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

## 7 What are my rights in relation to my personal data?

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

### The right to be informed

We will inform you of what personal information we collect and how this is used. This privacy notice is how we inform you of this information.

We will inform you of any changes to the way we process your data.

### The right of access

You have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

### The right of rectification

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

### The right to erasure

In certain circumstances you can ask for the data we hold about you to be erased from our records.

### The right to restrict processing

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data:

- a) by withdrawing your consent for us to use it;
- b) if it is no longer necessary for us to use your personal data;
- c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or
- d) if we haven't handled your personal data in accordance with our obligations.

### The right to data portability

You have the right to have the data we hold about you transferred to another organisation.

### The right to object

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

### Rights in relation to automated decision making and profiling

We do not make automated decisions. However, should this change, and you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

### 8 Where can I find more information about JML's handling of my data?

Should you have any queries regarding this Privacy Notice, about JML's processing of your personal data or wish to exercise your rights you can contact JML's Data Protection Representative using this email address:

[Compliance@jmlgroup.co.uk](mailto:Compliance@jmlgroup.co.uk)

If you are not happy with our response, you can contact the Information Commissioner's Office:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

[www.ico.org.uk](http://www.ico.org.uk)

UK Calls - 0303 123 1113

Outside UK - +44 1625 545 700