This Privacy Notice explains what personal data we will collect and how we will use it.

### Privacy

This User Privacy Notice ("Privacy Notice" or "Notice") was last updated on 22<sup>nd</sup> March 2018. This Privacy Notice may vary from time to time so please check it regularly.

This Notice describes the types of information collected, how that information is used and disclosed, and how you can access, modify, or delete your information.

Land Securities Properties Limited (company number 961477) whose registered office is at 100 Victoria Street London SW1E 5JL ("Landsec", "we", "us" or "our") is the 'data controller' for the personal data we collect. We are registered with the Information Commissioner's Office with registration number **Z5806812**.

Where you are submitting an application on behalf of a candidate you shall only do so provided that you have the candidate's authority to provide their Personal Data and have made them aware of the conditions of processing in accordance with the terms of this privacy notice.

Landsec will collect and process the following personal data about you:

• Information that you provide to us- this includes information that you give us by registering on this site, accessing/submitting any applications, using any of the services provided on this site, and/or through offline means. This is likely to include your name, email address, postal address, phone number, qualifications, employment history, your right to work in the UK, other application details and your resume/CV;

For monitoring of equal opportunities monitoring we also collect information relating to your ethnicity; age; gender; disabilities and sexual orientation – however, this information is not mandatory and you do not need to provide us this.

• Information we obtain from other sources- we will obtain information about you (such as details of your suitability to work with us, your past performance at work, your character, verification of the information that you provide to us, and if legally permitted, any history concerning criminal convictions) from third-party references that you provide to us, from your previous and/or current employers, and from third-party background checking services.

We refer in this Privacy Notice to the information about you that we hold as "Personal Data."

#### **Uses of your Personal Data**

Your Personal Data may be stored and processed by us for the following purposes:

• to consider your job application (including, in some cases, verifying your qualifications and references with those third parties you name);

• to notify you of relevant job vacancies with Landsec that you may be interested in, in the future;

• to comply with legal/regulatory requirements; and

to ensure diversity and equal opportunities within our recruitment practices.

We are entitled to use your Personal Data in these ways because:

• we need to in order to consider you for a position at Landsec for the purposes of entering into an employment contract;

• we have legal and regulatory obligations that we must discharge; or

• the use of your Personal Data as described is necessary for our legitimate business interests such as ensuring that we undertake appropriate checks on the qualifications and experience that applicants tell us they have.

# Disclosure of your information to third parties

We may share your Personal Data with third parties in the circumstances below:

- to our service providers (for example, the providers of our HR system and recruitment module; the party who provides e-contract signature; and the third parties used to make checks on qualifications and experience) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your Personal Data as described in this Privacy Notice;
- to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation or to establish, exercise or defend our legal rights.
- to sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers;
- where we are required to do so by law, court order or other legal process;
- where, acting in good faith, we believe disclosure is necessary to assist in the investigation or reporting of suspected illegal or other wrongful activity. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

# **Automated Decision Making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We are allowed to use automated decision-making where it is necessary for entering into a contract with you. We use automation to reject applications submitted relating to applicants who do not have the right to work in the UK. This processing is undertaken in order to comply with our legal obligations.

### International transfers of Personal Data

Landsec has in place administrative, technical and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the personal information that Landsec holds. We place similar obligations on our third parties and risk assess their security based on the sensitivity of the personal data that they hold.

If Landsec transfers your personal information outside of the EEA, it will continue to be subject to one or more appropriate safeguards set out in the law. These might be the use of model contracts in a form approved by regulators, or having our suppliers sign up to an independent privacy scheme approved by regulators (like the US 'Privacy Shield' scheme).

Landsec uses Workday to process its recruitment applications, which are located in the US. Workday is Privacy Shield certified and provides Landsec with assurances that the data is held securely in accordance with international standards of information security.

# **Retention of Personal Data**

How long we hold your Personal Data for will vary. The retention period will be determined by various criteria including:

• the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and

• legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

Generally, we will look to keep your details within our system for 12 months to update you on any other relevant positions that you may be interested in.

### Your rights

You have the right to opt out of receiving any marketing information which we send you. If our processing of personal data is based on your consent, you have the right to withdraw consent for future processing at any time by contacting us. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason (other than consent) for doing so;

You have the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;

In some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to us;

You have the right to request that we correct your Personal Data if it is inaccurate or incomplete;

You have the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;

You have the right to object and/or request that we restrict our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your Personal Data but we are legally entitled to refuse that request; and

You can also contact the Information Commissioner's Office via <u>https://ico.org.uk/</u> for information, advice or to make a complaint.