

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 6th June 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, credit history, driving license, your right to work in the UK, information obtain from public records, other application details and your resume/CV;

For 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 will require basic criminal reference checks for all candidates who are offered employment, and we have policies in place to ensure that any information collected will be protected.

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.

In the instances of special categories of personal data collected, the data is collected for substantial public interest:

- to ensure diversity and equal opportunities within our recruitment practices;
- to protect the public against dishonesty in relation to criminal reference checks performed as part of our recruitment procedures.

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;
- Landsec uses Microsoft Office 365 cloud technology for its operations. Its data centres are located with the EEA.

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. We also automatically reject applications relating to applicants under the age of 18 as we have separate recruitment schemes to accommodate individuals applying between 16 to 18.

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.

Landsec uses Workday to process its recruitment applications. The data is held within the EEA, but access and support can occur from the USA. As such a Model Clause agreement is in place to ensure the safety of this data transfer.

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

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

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

- Subject to certain conditions, 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. If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. Your request may also not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
- Subject to certain conditions, 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. You also have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details. This right only applies to your own personal data. When exercising this right, please be as specific as possible.

- Subject to certain conditions, 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. We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims. 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).

- Subject to certain conditions, 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 this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Subject to certain conditions, 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.

- Subject to certain conditions, request the transfer of your personal information to another party. If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.

- Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. If you withdraw your consent, this will only take effect for future processing.

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 email dataprotection@landsec.com

You will not have to pay a fee to access your personal information (or to exercise any of the other rights); however, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

For more information, please contact the data protection officer on dataprotection@landsec.com

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was last updated on 30th September 2020. If it is necessary for us to alter the terms of the Privacy Notice, we will post the revised Privacy Notice here. We encourage you to frequently review the Privacy Notice for the latest information on our privacy practices.

Date	Changes to Privacy Policy
25 th May 2018	Updates relevant to GDPR
13 th June 2018	Updates to Subjects Rights wording and Automated Decision Making
30 th September 2020	Privacy Shield Update