

LEAP Apprenticeships & Early Careers (“LEAP”)(“we” or “us”)

We are committed to maintaining your confidence and trust with respect to the privacy of the personal information we collect from you. This Privacy Policy applies to personal information that you provide to us directly or through one of our associated applications, as well as other information we receive from you or from third parties in connection with your application. The policy describes how we protect and use the personal information we receive, the rights you have and who to contact for more information. The policy forms part of our Terms of Use, so please read it carefully.

If you complete an application, the data controller for your personal information will be shared with LEAP.

What information do we collect about you?

We will collect information about you when you apply for more information using the application form on our website.

The type of information we may collect includes:

- Name, address, phone number, email address
- Job preferences and areas of interest
- Right to work in the UK (British national or other right to work)
- Pay type (hourly/daily/annually), pay rate or salary
- Details of any pending prosecutions and unspent criminal convictions
- Worked or working in the military
- Work history: employer, position, start and end dates, duties
- Education and qualifications: school or university, qualification level, start and end dates
- Racial or ethnic origin
- Disabilities

We may ask for some sensitive personal information, such as race or ethnic origin, for the purposes of equal opportunities monitoring, or we may ask if you have a disability so we can make necessary adjustments. This information is usually voluntary and you will be given the opportunity to decide if you want to provide it or

not. To the extent you choose to make sensitive personal information available to us, you agree to us processing that information in accordance with this policy.

We may supplement the information that you provide to us with information that we receive later on from third parties, for example, references, recruiters and organisations that provide background checks (this may include right to work, criminal records checks, reference checks, background checks and verification of qualifications, to the extent permitted by law).

We may also collect information from publicly available information sources such as social media websites and corporate directories so that we can contact you about potential opportunities which may be relevant to you.

If you attend an interview (online, on the phone or in person), we may keep notes about the conversation you had with our recruitment team and managers.

We automatically collect certain data from you when you use any of LEAP sites, including IP address or other unique device identifiers, information collected by cookies on your usage of any of LEAP sites, your mobile carrier (if applicable), time zone setting, operating system and platform and information regarding your use of any of LEAP sites.

How do we use the information we collect about you?

We will process your personal information for legitimate recruitment, human resources and business management purposes. These include:

- Processing your application when you complete the application online, including evaluating your application and verifying your qualifications and experience
- Carrying out background checks including, to the extent permitted by law, checking references, qualifications, right to work and criminal records
- To support the Armed Forces community by recruiting veterans, young and old
- Conducting equal opportunities and diversity monitoring

Contacting you about employment opportunities where your employment history, education and qualifications and salary expectations match requirements

Contacting you about employment opportunities that match your stated preferences via email or phone

To keep you informed about what's going on in our business and associated businesses

To contact you for your views on our services

Record-keeping related to the recruitment/hiring process

Analysing the recruitment/hiring process and outcomes

Notifying you about updates or changes to the site or services whenever necessary

For market research and analytics purposes, to track activity on our site, to publish trends and/or to improve usefulness and content to provide a more personalised online experience (this will be on an anonymous basis as far as possible)

Your personal information will be processed for the limited purposes described, and in accordance with relevant privacy and other applicable laws. We endeavour to restrict the collection of personal information to that which is relevant and necessary for our recruitment and related purposes.

When we collect personal information from you we will normally indicate whether it is mandatory or voluntary – this is done on our website by using asterisks to mark mandatory fields.

Legal basis for processing

Some of the information we collect is provided by you voluntarily when you choose to register with the LEAP site or when you apply for more information. If you have provided information voluntarily, you are free to withdraw your consent at any time (see Your Rights section below)

Once we begin the application process, some of the personal information we collect is necessary for us to fulfil our legal obligations. This can include verifying your identity and eligibility to work in the UK. We also ask for information about disabilities so we can make appropriate arrangements for interviews, and we collect information about racial origin and ethnicity to meet our equal opportunities and diversity obligations.

The remainder of the information is necessary for our legitimate business interests as an employer and to help prevent fraud. This includes confirming your qualifications, obtaining references and conducting criminal records and other background checks. We also collect information to enable us to run a diverse and effective recruitment process, and to carry out analysis, monitoring, and reporting.

Keeping you informed and your right to opt-out

If you do not fully complete your online application we may contact you by email to remind you to provide the remaining information. Please note that we cannot consider incomplete applications.

If you have applied for more information or a position via a third-party link we may use the information we collect to let you know about our other services which may be of interest to you and to keep you updated with information about relevant employment opportunities, career events, career advice, industry information and what's going on in our businesses. Please see "Your Rights" below for details of how to stop receiving communications from us.

Retention of information

We will continue to hold your details for as long as you indicate that you are happy for us to do so. If you do not want to be considered for other positions or would like to have your personal information removed, please contact enquiries@leapapprenticeships.co.uk

Unless required for legal purposes or in connection with employment, we will retain your personal data for a maximum of **12 months** from the date of submission or the latest update of your details or account information.

Your information may be retained for a longer period if there are valid legal grounds for us to do so, for example if required by law or court order, or as needed to defend or pursue legal claims.

How we share your information

We will use your personal information to send you direct marketing, but we will not provide your personal information to third parties to use for their direct marketing purposes. These restrictions do not apply to contact or other personal data obtained in the context of a customer/supplier relationship or other non-employment relationship with us.

However, we may use external third party providers to perform certain services for us. These services / service providers may include but are not limited to:

- Avature, the company which currently provides the platform for our recruitment system; at the date of this policy, they store your information in the European Economic Area and have back up facilities outside the European Economic Area;

- Service providers who help us with psychometric ability testing, video interviews, audit services, administrative services, IT technologies (e.g. data storage), security services and insurance claims;

- Background check providers who help us with reference checking, pre-employment checks, vetting services and verifying the information that you have provided if your application is successful;

- Service providers that assist us in understanding how our websites works by setting cookies on our websites

- Service providers who send postal mail and emails and analyse data;

- Referees, so they can provide a reference

These third parties have access to your personal information solely for the purposes of performing the services specified in the applicable service contract, and we require them to protect the personal information they handle and to keep it secure. In addition, we may be required to disclose your information to other third parties as required by law, regulatory requirement or court order, or to exercise or defend our legal rights to the extent authorised or permitted by law.

We may also disclose and/or transfer your personal information in connection with a reorganisation of all or part of our business, if the majority of our shares are bought by another company or if we transfer all or some of our assets to another company.

Transferring information to other countries

Some of the companies who provide services to us may be located outside the United Kingdom. For example, Avature currently has backup facilities in the United

States. As a result, your personal information may be transferred outside the UK, including to locations outside the European Economic Area where data protection laws may not provide the same level of privacy protection. We will ensure that our service providers comply with any legal requirements that apply to the transfer of personal information outside the UK. For example, Avature is currently certified to the EU-US Privacy Shield. In other cases we may require the service provider to sign the approved European Commission Standard Contractual Clauses for the transfer of personal data to third countries.

Confidentiality of Account Information and User Identification

Where applicable, it is your responsibility to ensure the confidentiality of your account, user identification, password or any other information provided as part of our security procedures. You agree to accept responsibility for all activities that occur using your account, user identification or password and acknowledge that we shall not be liable to any person for any loss or damage which may arise as a result of your failure to keep this information secure. Please let us know immediately if you believe that your password, user identification or any other information provided as part of our security procedures has become known to anyone else, or if this information is being, or is likely to be, used in an unauthorised manner.

We reserve the right to disable any user identification, account or password, at any time, if in our opinion you have failed to comply with any of the provisions of the conditions of use of any LEAP site.

How is your information protected?

We take the protection of your information seriously and have appropriate organisational and technical security measures in place to keep it safe. Internally, we restrict access to personal information. Only individuals who need access to your personal information for legitimate business purposes have access to it.

We also ensure that LEAP personnel are adequately trained in protecting your personal information. Our procedures mean that we may request proof of identity before we share your personal information with you.

Links to other websites

Links may be provided on our website to other websites that are not operated by us. If you use these links, you will leave our website. You should note that we are not responsible for the contents of any third-party website. External sites will have their own privacy policies which you should read carefully.

Changes to this policy

Any changes to this privacy policy will be posted here. Please refer back to this page regularly.

Your Rights

Communications

You can let us know if you no longer want to receive emails from us each time that you receive a message by following the instructions (e.g. link to unsubscribe). You can also opt-out of receiving communications at any time by contacting enquiries@leapapprenticeships.co.uk

If you choose to opt-out and then decide to apply for a new opportunity within LEAP, you may have to contact enquiries@leapapprenticeships.co.uk in order to remove your email address from the unsubscribe list

Access and Correction

You may request details of the personal information about you that may be held in connection with LEAP. If you would like a copy of it, please email us at: enquiries@leapapprenticeships.co.uk or write to us at LEAP Apprenticeships & Early Careers, Lodge Way House, Lodge Way, Harlestone Road, Northampton, NN5 7UG

Deletion

If you ask us to delete your personal information, we will endeavour to fulfil your request but some information (for example, full name, your unique identifier

(currently email address)) may be retained as necessary for legitimate business purposes or to comply with our legal obligations.

Other Rights

You may also have the following rights in relation to your personal information:

in certain circumstances, the right to restrict or object to the processing of your personal information (including any profiling), or request that your personal information is deleted

where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent

in certain circumstances, the right to receive a copy of the personal information which you have provided to us, in a structured, commonly used and machine-readable format or to request that we transfer that information to another party (known as “data portability”)

the right to complain to a Data Protection Authority (see further below)

If you have a query about this privacy policy or wish to exercise your rights, please contact enquiries@leapapprenticeships.co.uk

If you are not satisfied with our use of your personal information or our response to any request made by you in relation to your personal information, you have a right to make a complaint to the Information Commissioner:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 (national rate)

