

## **Ince & Co Privacy Statement for Apply4Law**

Ince & Co understands the importance of and is committed to data security and protection. This privacy statement explains how we collect, process and protect your personal data, particularly in relation to our applicant tracking system, Apply4Law.

Ince & Co uses Apply4Law to facilitate the graduate recruitment process and to process certain information for the purpose of considering and efficiently administering applications. Any personal data that you provide on this website will be controlled by Ince & Co. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **1. Data Controller**

The Data Controller is Ince & Co LLP, Aldgate Tower, 2 Lemn Street, London E1 8QN and/or another entity in the Ince & Co network.

Ince & Co in this privacy statement refers to Ince & Co LLP, its subsidiaries and other partnerships, corporations, undertakings and entities which are authorised to practice using the name 'Ince & Co' ('the Ince & Co network'). There are a number of entities through which Ince & Co provides legal services. Depending on the location where legal or other services are provided, another undertaking or entity may be the data controller in relation to your personal data. Please visit <http://www.incelaw.com/en/legal-notice> for details of the Ince & Co entity through which we practise law in each jurisdiction and, where necessary having regard to local applicable data protection or privacy laws, a country-specific privacy notice.

### **2. Your data**

When you create an account on AllHires to use Apply4Law, you can submit multiple applications. Our data retention policy is at the account level; this means that your full account is retained against the longest retention period as applied to any of the applications you have made. For the avoidance of doubt, this means that applications are not deleted as the retention period expires, rather your full account is deleted when you revoke consent or when the latest data retention period expires.

### **3. Your online CV and application – retention policy and use of your personal data**

The details of your application, covering letter, CV and academic results and any other information will not be viewed by anyone except Ince & Co.

This information forms the basis for any application and will be used for the purpose of considering and efficiently administering your application.

As part of the application process, you may be invited to complete the Watson Glaser Critical Thinking Appraisal test. We use the test as part of our selection process to assess your suitability for the role. Your results will remain strictly confidential and will only be seen by Ince & Co. All results will be stored in accordance with the General Data Protection Regulation (GDPR).

Your Watson Glaser results will be integrated into your Apply4Law application form and retained alongside your application to the firm.

Personal data in applications, including Watson Glaser results, will be retained on the platform for a period of at least 12 months and up to no longer than 18 months from the date of the most recent application made to the firm, or at least 12 months and up to no longer than 18 months from the most recent update made to your application whilst the

application is in progress for the purpose of considering and efficiently administering your application, and will be deleted after that period.

Personal data for successful graduate recruitment hires is retained on the graduate recruitment platform for a period of at least 36 months and no longer than 42 months from the date of the most recent application made to the firm, or at least 36 months and no longer than 42 months from the most recent update made to your application whilst the application is in progress, and will be deleted after that period. This extended retention period is necessary when taking into account that graduate recruitment hires are often made several years in advance of the start date.

Personal data from successful applications will be transferred to an HR employee file and retained as per the firm’s employee file data retention policy, a copy of which can be provided as part of the offer and onboarding process.

We follow strict procedures to protect your personal data and will ensure that your personal data is handled in a responsible way. Your personal data will only be used for the purposes listed above. We will never sell, rent or otherwise make available any of your personal data, including your email address, unless required to do so by law.

If you fall into any of these categories, the retention period will apply as a minimum.

**4.1 If you have registered but not submitted any applications:**

<b>Rule name</b>	<b>Reason for retention</b>	<b>Retention period</b>
<b>Agreed privacy policy – no application</b>	You have agreed to the privacy policy but have no applications.	12 months from agreeing to the privacy policy.
<b>In progress application</b>	You have started or updated an in-progress application.	12 months from last update.

**4.2 If you have submitted applications:**

<b>Rule name</b>	<b>Reason for retention</b>	<b>Retention period</b>
<b>Successful application</b>	You have a successful application.	36 months from submission of successful application.
<b>Unsuccessful application</b>	You have an unsuccessful application or have withdrawn your application for consideration for this role.	12 months from submission of unsuccessful/withdrawn application.

<b>No final recruitment status</b>	You have an application which has not been marked as successful, withdrawn or unsuccessful.	12 months from submission of application.
<b>Explicit extended consent</b>	If we ask to keep hold of your data.  For example: to consider you for future roles or to continue to send you Job Alerts.	For 1 month following the request to keep your data.  If you agree, then we will retain your data as long as agreed with you.
<b>Agreed privacy policy – applications</b>	You have agreed to the privacy policy and have submitted applications. The most likely reason for this rule applying is that you have logged in and agreed a new or amended privacy policy.	12 months from agreeing to the privacy policy.

## 5. Consent

To revoke consent for the retention of your data you can:

- 1) Contact Apply4Law and request deletion [support@allhires.com](mailto:support@allhires.com)
- 2) Contact Ince & Co and request deletion [dataprotection@incelaw.com](mailto:dataprotection@incelaw.com)

Your personal data will be retained for up to 28 days from the day after your request is received, after which your data is deleted unless there is a legal reason to retain your data.

If you change your mind and want your data to be retained you must consent again to the privacy policy or notify the firm within the 28 day period.

## 6. Information management

You can edit any information entered at any time. You have certain rights to see and correct data held about you.

## 7. Security

We take security seriously.

There is physical security of the office environment and computer facilities in order to protect people and information: our offices are secure and subject to card or keypad based access control and individuals are easily identifiable as office occupants. There is storage for files and papers within the office and the offices operate with a clear desk policy such that there is limited scope for visitors to see confidential material.

Our data systems (servers, computers, tablets and infrastructure) employ layered models for security and we use best practice security designs which are regularly tested by third party security assessors.

The security of our system is very important to us and we work hard on it. However, please note that no data transmission over the Internet is 100% secure.

### **8. Use of Cookies**

AllHires cookie name: Purpose.

Google Analytics collects performance data on AllHires users. For more information, please read Google Analytics privacy policy.

### **9. Apply4Law Privacy Policy**

You can view the AllHires Apply4Law privacy policy [here](#).

### **10. Pearson Privacy Policy (Watson Glaser)**

You can view the Pearson privacy policy [here](#).