

## Job Applicant Privacy Notice

**Job Applicant Privacy Notice****Last Updated: May 2025**

## **1. Who we are and what we do**

### **Who we are**

We are The Gap Partnership (“The Gap Partnership”, “us”, “we”, “our”). Our global Job Applicant privacy notice explains how we may use the personal data we collect about you during the recruitment phase.

The Gap Partnership entity listed in the job advertisement is the controller of your personal data (as defined in applicable global data protection legislation (e.g. UK/EU General Data Protection Regulation “(GDPR)”) and is responsible for handling your personal data.

### **What we do**

The Gap Partnership is a management consultancy specialising in negotiation. We are committed to protecting the privacy and security of the Personal Data we process about you.

## **2. Who this privacy notice applies to**

This privacy notice applies to you if you apply for a job with us, whether as an employee or a consultant.

## **3. Purpose of this privacy notice**

The purpose of this privacy notice is to explain what Personal Data we collect about you when you apply for a job with us and how we process it during the recruitment process. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘Contact Us’ section.

## **4. What Personal Data is**

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

## **5. Personal Data we collect**

When you apply for a position with us (whether as an employee or consultant) or submit your CV (or similar employment information) to us, whether directly or through an agency, or attend an interview in person or by remote means, we will collect your Personal Data. This includes (but is not limited to):

- Name and contact details (address, mobile phone number and email address)
- Company details (where applicable)
- Date of birth and gender
- Work history and employment positions held
- Salary, other compensation, and benefits information
- Nationality / visa / work permit information (where applicable)
- Academic and professional qualifications, education, and skills
- Photographs you may submit with your application
- Demographic information
- Records we create during interviews or correspondence with you
- If applicable, results of pre-employment screening checks, including references and DBS checks
- Any other information you choose to give us

Please note, when we receive references, we do so on a confidential basis. As a result, we would never provide you with a copy of your reference from a referee.

We may also collect special category Personal Data in accordance with the Equality Act 2010. We will only do this, for example, to make reasonable adjustments to enable all candidates to apply for vacancies, attend interviews and to commence employment. This is also necessary to ensure we meet our legal obligations when recruiting.

## **6. How we collect your Personal Data**

We collect most of the Personal Data directly from you in person, by telephone, text or email.

However, we may also collect your Personal Data from third parties, such as referees and recruitment agencies.

## **7. Purposes and bases for using your Personal Data**

We will process your personal information for the following purposes and under the following lawful bases:

Purpose	Lawful Basis for Processing
To assess your suitability for the role	Processing is necessary for taking steps to enter into a contract with you or for the performance of our contract with you (Article 6(1)(a) of the UK GDPR).
To make reasonable adjustments for you during the interview process and comply with our legal obligations under the Equality Act 2010.	Processing is necessary for us to comply with our legal obligations (Article 6(1) (c) of the UK GDPR)  For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights (Article 9(2) (b) of the UK GDPR and Schedule 1 part 1(1) of the DPA 2018)
To conduct pre-employment screening checks including checking your identity and your right to work in the UK	Processing is necessary for us to comply with our legal obligations (Article 6(1) (c) of the UK GDPR)  For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights (Article 9(2) (b) of the UK GDPR and Schedule 1 part 1(1) of the DPA 2018)
To contact unsuccessful applicants about future suitable vacancies	Processing is necessary for our legitimate interest of searching for suitable candidates for future vacancies based on their skills set out in the records we hold on candidates (Article 6(1) (f) of the UK GDPR)

Note for companies outside the UK and EU/EEA: The relevant lawful bases from the locally applicable laws of your respective country apply in addition to the lawful bases above (if applicable).

## 8. Processing special category Personal Data

We will only process the more sensitive Personal Data, known as ‘special category’ Personal Data where we meet one of the conditions required by law for doing so. This includes complying with legal obligations or exercising specific rights in the field of employment law. In some cases, we may ask for your explicit consent to process this type of Personal Data.

We process special categories of Personal Data when we collect or process information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work and to provide appropriate workplace adjustments.

## 9. Sharing your Personal Data

We may share your Personal Data with service providers and suppliers to our business who process Personal Data on our behalf. In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract between us and the service providers and suppliers.

Within our organisation, your Personal Data will only be shared with those who need to have access to it, which will primarily be our HR personnel and hiring managers.

We may also share your personal data with other The Gap Partnership entities for the purposes of assessing your suitability for the role.

## 10. International Transfers

We will only transfer (‘transfer’ includes making available remotely) Personal Data from countries in the UK to countries outside of the UK where:

- the transfer is to a country (or an international organisation) that the UK government has determined ensures an adequate level of protection (“Adequacy”);
- an International Data Transfer Agreement (IDTA) or Standard Contractual Clauses adopted by the UK Government have been put in place between the entity in the UK or EU/EEA and the entity located outside the UK or EU/EEA;
- for transfers to the United States, we may rely on organisations that have self-certified under the UK Extension to the EU-U.S. Data Privacy Framework;
- binding corporate rules have been implemented, where applicable; or where
- the transfer is otherwise permitted by the law.

## 11. How long will we retain your information?

We will retain your Personal Data for only as long as is necessary for the recruitment process. If your candidacy is successful and you are employed or hired by us, your Personal Data will be processed and retained as set out in our employee privacy notice, provided to you with your employment paperwork.

If your candidacy is not successful, we will retain your CV, application details and interview notes for 12 months (from the date we notified you we would not move forward with your application) in order to inform you about any future vacancies we have that may be of interest to you. Please let us know if you would like us to delete your records before our retention period lapses and we will do so.

We will also retain Personal Data where it is necessary to comply with our legal obligations or as necessary in relation to legal claims. This is rare but may mean we need to retain your Personal Data for longer than 12 months.

## 12. Your rights and how to complain

In the EU and the UK, you have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**  
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)  
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**  
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)  
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**  
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**

You have the right to restrict our use of your Personal Data.

- **Right to portability**

You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision-making.**

You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

If you are based in the EU you have the right to lodge a complaint with the supervisory authority of the Member State where you live and work.

To make a complaint outside of EU or the UK, please contact the relevant supervisory body in the country or the region where you are located.

### **How to exercise your rights**

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific

information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

### **13. How to contact our Data Protection Officer**

If you wish to contact our DPO in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please email [dataprotection@thegappartnership.com](mailto:dataprotection@thegappartnership.com).

### **14. Changes to this privacy notice**

We may update this privacy notice from time to time in response to changes in applicable laws and regulations and our processing practices. When changes are made, we will update the effective date at the top of this document.