Privacy Notice for Job Applicants

Edition Date: November 2026

1 What is the purpose of this document?

Turley Associates Limited ("**we**", "**our**", "**us**" "**Turley**") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during the job application process with us, in accordance with the data protection and privacy laws applicable to Turley (including, as applicable: the Data Protection Act 2018, UK General Data Protection Regulation ("**UK GDPR**"), and the General Data Protection Regulation (EU) 2016/679 ("**EU GDPR**"), in each case as amended from time to time).

Turley is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you ("**you**", "**your**"). You are being provided with a copy of this privacy notice because you are applying, or acting as a referee for someone applying, for work with us (whether as an employee ("**co-owner**"), worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. These other applicable privacy notices include for example our website privacy notice.

Turley is a private limited company, with registered company number 02235387, and our registered office is situated at Level 5 Transmission, 6 Atherton Street, St John's Enterprise City, Manchester, United Kingdom, M3 3GS.

2 Data protection principles

We will comply with UK data protection law. This says that the personal information we hold about you must be:

1 Used lawfully, fairly and in a transparent way.

2 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

3 Relevant to the purposes we have told you about and limited only to those purposes.

4 Accurate and kept up to date.

5 Kept only as long as necessary for the purposes we have told you about.

6 Kept securely.

3 The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter (including via an enquiry on our website or which you may send to us via email or post).

- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, salary.

- Any information you provide to us during an interview or assessment carried out during the recruitment process. For certain roles, we may use different online assessments selected according to the role, including assessments of skills, aptitude and personality, together with video interviews. Depending on the assessments and features used, information collected or generated may include:
    - your assessment responses, interview answers, results, scores and reports, including AI-generated scores and evaluations;
    - audio and video recordings, camera stills and transcripts; and
    - information about how you interact with the assessment platform and assessment-integrity information, such as instances of leaving full-screen mode, indications of unauthorised devices or assistance, and the presence of other people during an assessment.

  Not all assessments use all these features. You will be informed before an assessment begins which recording, camera-monitoring and AI-evaluation features apply.

- The information provided on Turley's referee form, including name, title, address, telephone number, personal email address of the job applicant and referee.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records.

<u>Candidates in Northern Ireland</u>

The Equality Commission for Northern Ireland (ECNI) requires Turley to gather information from applicants applying for roles in Northern Ireland relating to community background. It is a legal obligation for Turley to ask for this information. This data is held on Turley records until the next annual return has been made to the ECNI. Overall numbers from different community backgrounds are shared with the ECNI, no names or identifying details are shared.

4 How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.

- Recruitment agencies via which you have applied for a role with us.

- The Turley website via which you have applied for a role with us.

- Your named referees, from whom we collect the following categories of data: dates of employment, job title, performance and conduct, and sickness absence record.

- Online assessment providers used in our recruitment process for certain roles, through which you may complete assessments and interviews and from which we receive assessment information, including results, scores, reports and, where the relevant features are used, recordings, transcripts and assessment-integrity information.

5 How we will use information about you?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role, which for certain roles may include online assessments as part of our recruitment process. We use assessment responses, results, scores and reports to inform recruitment decisions. For some assessments, automatically calculated scores may determine whether your application progresses or is rejected, as explained in Section 8.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Make appropriate adjustments for assessments, interviews or employment purposes.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Contact you, as a referee, to be able to request information about the job applicant's work history, qualifications, skills and work ethic.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract of employment with you. These are our lawful bases for processing your personal information.

Having received your CV and covering letter and/or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references.

6 If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application **successfully.**

7 How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1 In limited circumstances, with your explicit written consent.

2 Where we need to carry out our legal obligations and in line with our data protection policy.

3 Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our data protection policy.

4 Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example during an online assessment or interview. Please contact the Turley People and Culture team (careers@turley.co.uk) if you need an adjustment.

8 Automated decision-making

Automated decision-making involves using automated processing to make decisions about you. Except for the assessment-based decisions described below, we do not make decisions that produce legal or similarly significant effects for you based solely on automated processing. A decision is based solely on automated processing where there is no meaningful human involvement in taking that decision.

For certain roles, we use online assessments that automatically score your responses, including through AI evaluation where the relevant features are used. We use these scores to assess your suitability for the role and determine whether your application progresses.

For some assessments, an automatically calculated score below the applicable threshold may result in your application being rejected or not progressing to the next stage without human review before that decision is made. Other stages of our recruitment process involve human assessment or scoring.

Where we make a significant decision about your application based solely on automated processing, we will explain the decision and provide meaningful information about the main factors and assessment criteria involved, how the score and threshold affect the outcome, and the consequences for your application.

You have the right to:

- request human intervention in the decision-making process;
- express your view and make representations about the decision;
- contest the decision.

To exercise these rights, please contact us using the data protection contact details in Section 15 below.

9 Data sharing

In some circumstances we will share your personal information with third parties for the purposes of processing your application. This includes job recruitment boards through which applicants submit their information. For recruitment of certain roles, we may also share relevant applicant information with third-party online skills-assessment providers and receive assessment results, scores and reports from them to help evaluate your suitability for the role.

All our third-party partners/service providers are required to take appropriate security measures to protect your personal information. Where a provider acts as our processor, we only permit it to process your personal data for specified purposes and in accordance with our instructions, and not for its own purposes. Online assessment providers' privacy notices explain their processing purposes, responsibilities, retention arrangements and how to exercise your rights. You can continue to contact Turley using the details in this notice about our use of your information in recruitment.

Further information about how TestGorilla processes candidate information, including the respective responsibilities of TestGorilla and the recruiting organisation, is available in the TestGorilla Privacy Policy and Joint Controller Arrangement.

10 Data Transfers

Except for processing through TestGorilla described below, we will not transfer any of the personal information you provide to us outside the UK.

Personal information processed through TestGorilla, the online assessment platform we use for certain roles, is hosted in Ireland, within the European Union. Depending on the platform features used, some candidate personal information may also be processed in the United States by TestGorilla's service providers. International transfers are subject to the protections required by applicable data protection law, including standard contractual clauses. Further information about how TestGorilla processes personal information, including international transfers and safeguards, is available in the TestGorilla Privacy Policy. Please contact our data protection contacts identified in Section 15 below for further information about the relevant transfer arrangements and safeguards.

11 Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. Those acting on our behalf will only process your personal information on our instructions and are subject to a duty of confidentiality. Other recipients are required to protect your personal information in accordance with their applicable data protection responsibilities. Details of these measures may be obtained on request. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12 Data retention

How long will you use my information for?

If you are unsuccessful at any stage of the process, the information you have provided and which we hold in our own systems until that point will be retained for 6 months from the closure of the campaign. Information generated throughout the assessment process and held in our own systems, including interview notes, CVs, online assessment responses, results, scores and reports, is retained by us for 6 months following the closure of the campaign. Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not. If you are successful in your application, we will retain your information in accordance with our privacy policy for co-owners. CVs which are clearly unsuitable for the role will be deleted immediately.

We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention procedures and applicable laws and regulations. If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Information processed on online assessment platforms, including TestGorilla, may be retained for different periods from recruitment records held in our own systems. Please see the TestGorilla Privacy Policy for details of its retention arrangements for candidate information. The six-month period following campaign closure described above applies to recruitment records retained in our own systems.

13 Rights of access, correction, erasure, and restriction

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

- 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.

- 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.

- 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. 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).

- 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 (for example, email marketing or phone calls).

- 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.

- Request human intervention, make representations and contest significant decisions based solely on automated processing that produce legal effects or otherwise significantly affect you, as explained in Section 8.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Please be aware that these rights are subject to certain conditions and exceptions as set out in UK data protection law. 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 contact alison.browne@turley.co.uk or carol.maughan@turley.co.uk in writing and they will explain any conditions that may apply.

14 Right to withdraw consent

Where we rely on your consent to process your personal information for a particular purpose, you may withdraw that consent at any time by contacting Alison Browne (*alison.browne@turley.co.uk*) *or* Carol Maughan (*carol.maughan@turley.co.uk*).

We will stop the processing that relies on your consent but may continue to process information for other purposes where we have another lawful basis to do so. Withdrawing consent will not automatically end your application. If it affects our ability to carry out a particular recruitment activity, we will explain the implications and discuss any available alternatives with you.

15 Data protection contact

Alison Browne and Carol Maughan have been appointed to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact *alison.browne@turley.co.uk or carol.maughan@turley.co.uk*.

Further guidance on your rights is available from the Information Commission (https://ico.org.uk). You have the right to complain to the UK's supervisory authority for data protection, the Information Commission at https://ico.org.uk/concerns/ if you believe that your data has been processed unlawfully. However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The Information Commission will expect you to have done this before reviewing your complaint. Please contact the Turley IT team (itservicedesk@turley.co.uk) if you would like to raise a concern or ask us for clarification.

If you have any further questions regarding your job application please contact the Turley HR team (careers@turley.co.uk).