



Ropes & Gray International LLP

Reviewed 25 May 2018

DATA PROTECTION – CANDIDATE PRIVACY NOTICE

Introduction

This Notice provides a comprehensive overview of the practices of Ropes & Gray International LLP and its affiliates and subsidiaries (collectively, “**Ropes & Gray**” “**Us**”), with respect to the collection, use and disclosure, for recruitment-related purposes, of personal data and sensitive personal data about candidates applying for a job with us (collectively, “**Candidates**” “**You**”).

Our Collection and Use of Recruitment-Related Personal Data

What Data Do We Collect?

The types of data we collect (directly from you or from public or third party information sources such as recruitment agencies) depend on the nature of the position and role you are applying for within our firm and the requirements of applicable laws. Examples of this information may include, among other things:

- contact information (e.g., name, home and business addresses, telephone, e-mail addresses);
- personal details (e.g., date of birth, nationality, race, gender, preferred language, immigration status);
- education and training (e.g., education level, field and institution, competency assessments, professional licenses and certifications, and training courses);
- employment history, deal sheet and pro bono activity;
- photographs and other visual images of you;
- information about your hobbies and extra-curricular society and committee membership; and
- any other information you may input into your application form.

The examples provided are not all-inclusive. We also may collect similar or related information.

How Do We Use This Data?

We collect the personal data listed above for the purposes of considering and evaluating your eligibility and suitability for the job role you have applied for. This includes passing your data to key stakeholders at our firm who are involved in the recruitment process. As part of this process we will be verifying the information you have provided and conducting background checks on you.

Basis for Processing

We rely on separate and overlapping bases to process your data lawfully. In the majority of cases we rely on your consent or our legitimate interests in processing your personal data. In particular:

- for all types of candidates, once you have submitted your application, we rely on our legitimate interests in (i) ensuring it is reviewed and fairly considered for the job role applied for; and (ii) ensuring we hire people who meet the requirements of the job role.
- if you apply for our Vacation Scheme or Training Contract we use the Apply4law platform. Prior to submission, you are asked if you consent to us sharing certain of this personal data with a third party so that we can review your application in light of your socio-economic status (i.e. so we can see if you overachieved in light of your wider circumstances). We will rely on your consent to process your personal data in this way.

Where we rely on your consent we will make it clear to you at the time of collection of your personal data that we are relying in your consent to process that data for certain purposes, and you will have the right to withdraw your consent at any time.

Data Retention

We will retain your recruitment data only for as long as is necessary for the purposes set out in this Notice, subject to your right, under certain circumstances, to have certain of your recruitment data erased (see **Your Rights** below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights. In particular, we hold recruitment data about the following categories of person for the corresponding period of time:

Category of person	Retention period
Vacation Schemer and Trainees – applications successful	Your personal data is copied to your personnel file and is retained for the period of your employment. You will be provided with an Employee Privacy Notice upon receiving your offer of employment with us which explains this further.
Vacation Schemer and Trainee – application unsuccessful	Two years from the end of the consideration window for the job role applied for.
Other Candidates – Successful	Your personal data is copied to your personnel file and is retained for the period of your employment. You will be provided with an Employee Privacy Notice upon receiving your offer of employment with us which explains this further.
Other Candidates – Unsuccessful	One year from the date of submission of your application.

How We Share and Disclose Recruitment-Related Data

We may share your recruitment data with the following third parties for the purposes described below:

Service Providers: We share your recruitment data with third-party service providers who perform services on our behalf or for your benefit, such as for recruitment agents, consultants such as Lucy Hartley Ltd and software platforms such as Apply4Law.

Affiliates: We share your recruitment data with Ropes & Gray LLP, who is our affiliated legal entity, for internal administrative purposes and uses that are consistent with this Notice.

Legal Process and Safety: We may disclose your recruitment data in the event that we need to make or defend a legal claim.

Business Transfers: Your recruitment data may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction.

International Data Transfers

Any information that you provide to us is stored in the United States and processed by Ropes & Gray LLP as set out in this Privacy Notice. The European Commission (in the EU) has yet to make a decision of adequacy in relation to the protection given to your data in the United States. However, in order to ensure the protection of your data we have put in place European Commission approved Standard Contractual Clauses between us and Ropes & Gray LLP. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the **Contact Information** section below.

What are your rights in relation to the personal data we hold about you?

Access, rectification, erasure, restriction and portability

Subject to the conditions prescribed in applicable laws, you have the right: (i) to access, rectify or request erasure of your personal data; (ii) to ask us to restrict processing of it; and (iii) to request that it is transferred to a third party.

Right to object

You also have the right to object, on grounds relating to your particular situation, to processing of your personal data which is based on our or a third party's legitimate interests, including where we undertake any profiling on you.

You can exercise any of these rights by contacting us using the contact details provided below. You also have the right to lodge a complaint with a supervisory authority about our use of your personal data in the EU Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the GDPR.

Contact us

If you have any queries, questions or concerns about this Privacy Notice or our PII handling practices, please contact us at privacy@ropesgray.com