

## LPPI Job Applicant Privacy Notice

1 April 2026

### 1. Introduction

As part of any recruitment process, Local Pensions Partnership Investments Ltd (LPPI) collects and processes personal data relating to job applicants. LPPI is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### 2. What information do we collect?

LPPI collects a range of information about you during the recruitment process. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- medical information if you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about criminal convictions and offences; and
- information about your entitlement to work in the UK.

LPPI may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (e.g. email).

### 3. Why does LPPI process personal data?

It is in our legitimate interests to decide whether to appoint you to work 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.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts and due to our regulated nature, all roles require us to collect criminal record data from you and conduct a DBS check. The level of DBS check carried out is determined by the nature of the role.

LPPI has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

LPPI may process special category personal data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We process such information to comply with our legal obligations and exercise specific rights in relation to employment.

LPPI may use information you disclose about any disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made. We process such information to comply with our legal obligations.

We may also need to process data from job applicants to establish or respond to legal claims. If your application is unsuccessful, LPPI may keep your ordinary personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we store your data for this purpose and you are free to withdraw your consent at any time.

#### **4. Who has access to data?**

Your information may be shared internally for the purposes of recruitment. This includes members of the People and Culture team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless to discuss your application with any recruiter appointed by you in respect of the role or if your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you, and employment background check providers to obtain necessary background checks.

#### **5. How does LPPI protect data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

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.

#### **6. For how long does LPPI keep data?**

If your application for employment is unsuccessful, the organisation will hold your data on file for 12 months from the end of the relevant recruitment process. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your People and Culture file (electronic and paper based) and retained during your employment. The periods for which your data will be held can be found in our retention policy and schedule.

#### **7. Your rights**

As a data subject, you have several rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;

- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where LPPI is relying on its legitimate interests as the legal ground for processing.

These rights are subject to limitations under statute, and are not absolute.

If you would like to exercise any of these rights, please contact [peopleandculture@lppi.co.uk](mailto:peopleandculture@lppi.co.uk)

### **8. What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to LPPI during the recruitment process. However, if you do not provide the information, we will not be able to process your application properly or at all.

### **9. Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.