



TLT Policy

Candidate privacy notice

VERSION 3.0

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Final – Public

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1 What is this notice

- 1.1 This notice explains how TLT collects and uses your personal information as part of the recruitment process – what we collect, why we use it, who we share it with, and what rights you have over it.
- 1.2 Please read it alongside our main Privacy Notice and Cookies Policy, both available at www.tlt.com.

2 Who we are

- 2.1 Depending on the entity you are applying to work for, one or more of the following TLT entities may be responsible for your personal information:

Entity	Registration	Regulator	Registered office	ICO number
TLT LLP	LLP, England and Wales – OC308658	Solicitors Regulation Authority – 406297	One Redcliff Street Bristol BS1 6TP	Z5378293
TLT (NI) LLP	LLP, Northern Ireland – NC000856	Law Society of Northern Ireland	River House 48–60 High Street Belfast BT1 2BE	Z3336501
TLT Resourcing Limited	Company, England and Wales – 15944179	–	One Redcliff Street Bristol BS1 6TP	ZB91407

- 2.2 When we say "TLT", "we" or "us" in this notice, we mean whichever of these entities is relevant to your application.
- 2.3 TLT LLP, TLT (NI) LLP and TLT Resourcing Limited each act as data controllers in relation to candidate personal information — meaning each is responsible for deciding how and why it is used. Where two or more of these entities jointly determine the purposes and means of processing your personal information in connection with TLT's recruitment activity, they act as joint controllers within the meaning of Article 26 UK GDPR. TLT LLP takes primary responsibility for the day-to-day operation of this notice and for responding to requests and queries from candidates. However, you may exercise any of your data subject rights against any of the entities listed above using the contact details set out in this notice. The essence of the joint controller arrangement is available on request by contacting GDPR@tlt.com.
- 2.4 Our Data Protection Officer (DPO) oversees how we handle personal information. You can contact them at:
- 2.4.1 **Email:** GDPR@tlt.com
- 2.4.2 **Post:** Data Protection Officer, TLT LLP, One Redcliff Street Bristol BS1 6TP.
- 2.5 For recruitment-specific queries, you can also contact the recruitment team at Recruitment.Operations@tlt.com

3 What personal information do we collect?

- 3.1 The personal information we collect depends on the role you have applied for and the stage of the recruitment process. It may include:
- 3.1.1 **Identity and contact** — name, address, personal email address, telephone number, date of birth and gender.
- 3.1.2 **Professional and employment** — CV, employment and education history, qualifications, skills and experience (including start and end dates with previous employers), details of professional memberships (such as SRA number and date of admission, and accreditation under the

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Conveyancing Quality Scheme where relevant), jurisdiction(s) of qualification, and languages spoken.

- 3.1.3 **Remuneration and benefits** — information about your expected remuneration, including entitlement to benefits such as pension or insurance cover.
- 3.1.4 **Right to work** — information about your nationality and eligibility to work in the UK.
- 3.1.5 **Assessment information** — results of any assessments completed as part of the recruitment process.
- 3.1.6 **Contextual information** — socio-economic and educational background information to help us fairly assess candidates by understanding their achievements in the context of their background. The specific data points we may collect, and process include: the type of secondary school attended; eligibility for free school meals; whether you were the first in your immediate family to attend university; and postcode data used to generate a socioeconomic indicator. We use a third-party contextual recruitment platform, Dandi, to assist with this process, and your data may be shared with them for this purpose. Further details are set out in Section 9.
- 3.1.7 **Special category personal data** — health or medical information (including disability and reasonable adjustments), criminal records information (where relevant to the role), and equality monitoring information including ethnic origin, sexual orientation and religion or belief. See Section 7 for more detail.

4 What happens if you do not provide your information?

- 4.1 You are not legally required to provide personal information to us as part of the recruitment process. However, if certain information is not provided, we may not be able to:

- 4.1.1 process your application further or at all; or
- 4.1.2 make reasonable adjustments during the interview or selection process.

- 4.2 Where information is optional, we will tell you if that is the case.

5 How do we collect your personal information?

- 5.1 **Directly from you** — through your CV, job application and Diversity Monitoring form or by corresponding with you by post or email.
- 5.2 **Through interviews and assessments** — including any exercises or practical tasks completed as part of the recruitment process.
- 5.3 **From third parties** – including recruitment agencies, recruitment partners (who assist us with any recruitment process), referees, pre-employment screening and background check providers, credit reference agencies and criminal records check providers, where relevant to the role. Where we receive your personal information from a third-party source, we will provide you with the information required by Article 14 UK GDPR – including the source from which your data was obtained – at the earliest practicable opportunity and, in any event, within one month of first obtaining your personal data from that source.
- 5.4 **From publicly available sources** – such as professional registers (for example, the SRA register) or professional networking platforms, where relevant to your application.

6 How and why do we use your personal information?

- 6.1 We only use your personal information where the law allows us to. We always consider whether our use is fair and proportionate. Before setting out the specific purposes, here is a plain English explanation of the legal bases we rely on:
 - 6.1.1 **Legitimate interests** – We will use your personal data for our legitimate interests. These legitimate interests include:

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- (a) We have a genuine business reason to use your personal information that is proportionate and does not override your rights. In a recruitment context, this includes identifying and selecting suitable candidates, managing the recruitment process efficiently, protecting the firm from fraud, and maintaining accurate records. We may also use contextual recruitment information to understand candidates' achievements in the context of their background, identifying potential from diverse socioeconomic and educational environments. Before relying on this basis, we carry out a balancing assessment to weigh our interests against yours. You can ask for details of any such assessment by emailing GDPR@tlt.com.
- (b) **Performance of a contract** – we need your information to take steps at your request before entering into an employment contract – for example, processing your application and making you an offer.
- (c) **Legal obligation** – the law requires us to use your information in certain circumstances – for example, to carry out right to work checks and pre-employment screening relevant to your role.
- (d) **Consent** – in limited circumstances we may ask for your agreement to a specific use – for example, to retain your details for future vacancies. Where we rely on consent, it will always be freely given, and you can withdraw it at any time without any negative consequences for your application.

Area	What we do	Why we are allowed to
Recruitment and candidate management	We manage the recruitment process from application through to offer – reviewing applications, shortlisting, conducting interviews and assessments, corresponding with you, keeping you informed and making hiring decisions.	We rely on our legitimate interests in identifying and selecting the best candidates for our roles and in running an effective and professional recruitment process. We have carried out a balancing assessment to confirm this is proportionate.
Contextual recruitment information	We collect contextual information on candidates by understanding their achievements in the context of their background, identifying potential from diverse socioeconomic and educational environments.	We rely on our legitimate interests in understanding the diversity of our candidate pipeline and making hiring more inclusive for candidates from underrepresented socio-economic and educational backgrounds. We have carried out a balancing assessment to confirm this is proportionate. You have the right to object to this use – see Section 13.
Pre-contractual arrangements	If you are offered a role, we put in place the documentation and arrangements needed to start your employment.	We need your information to take steps at your request before entering into a contract with you.
Pre-employment screening	We carry out right to work checks and, where relevant to the role, pre-employment screening including background checks, credit history checks and criminal records checks.	Right to work checks are required by law (legal obligation). For other background and credit checks, we rely on our legitimate interests in protecting our clients, staff

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		and the firm from risk – and we have carried out a balancing assessment to confirm this is proportionate. Criminal records checks are subject to additional legal requirements under Article 10 UK GDPR and are only carried out where the law specifically authorises them. See Section 7 for details of the specific legal conditions we rely on for criminal records information.
Equality and diversity monitoring	We collect equality monitoring information to monitor equal opportunities and, where required by law, to report to bodies such as the Equality Commission for Northern Ireland.	In respect of TLT (NI) LLP, collection and reporting of equal opportunity monitoring data is required by law (legal obligation) under the Fair Employment and Treatment (Northern Ireland) Order 1998. In respect of TLT LLP (England and Wales), we rely upon our legitimate interests in monitoring and promoting equality of opportunity in the workplace, supported by Article 9(2)(b) UK GDPR and Schedule 1, paragraph 8, Data Protection Act 2018. Provision of this information is voluntary for candidates applying to TLT LLP.
Regulatory compliance	We monitor our recruitment practices for compliance with our legal and regulatory obligations, professional standards and internal policies.	The law requires it (legal obligation). We also rely on our legitimate interests in maintaining lawful and consistent recruitment standards.

7 Special category personal data

- 7.1 Some of the personal data described in Section 3 constitutes special category personal data for the purposes of UK GDPR – for example, health or disability information, equal opportunity monitoring data, or information about ethnic origin, sexual orientation or religion or belief. We only process special category personal data where the law specifically permits us to do so.
- 7.2 The conditions under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018 upon which we rely to process special category personal data in a recruitment context are as follows:
- 7.2.1 **Equality of opportunity monitoring** – we process equal opportunity monitoring data for the purpose of monitoring and promoting equality of opportunity or treatment between persons, in reliance upon Article 9(2)(b) UK GDPR and Schedule 1, paragraph 8, Data Protection Act 2018. In respect of TLT (NI) LLP, we also rely upon this condition to fulfil our legal reporting obligations to the Equality Commission for Northern Ireland under the Fair Employment and Treatment (Northern Ireland) Order 1998. Please see the equality and diversity monitoring row in Section 6 for further detail.

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- 7.2.2 **Reasonable adjustments** – we process health and disability information where it is necessary for the purposes of carrying out our obligations and exercising our rights in the field of employment law, including to consider and implement reasonable adjustments for you as a candidate, in reliance upon Article 9(2)(b) UK GDPR and Schedule 1, paragraph 1, Data Protection Act 2018.
- 7.2.3 **Pre-employment screening (criminal records)** – where the role you are applying for requires us to obtain information about your criminal record, we process that data pursuant to Article 10 UK GDPR (which imposes specific additional requirements on the processing of criminal convictions and offences data) and in reliance upon Schedule 1, Part 2 of the Data Protection Act 2018. The specific Schedule 1 condition(s) we rely upon will depend on the nature of the role and may include paragraph 29 (administration of justice or legal proceedings) and/or paragraph 36 (safeguarding of children and of individuals at risk). Criminal records checks are only carried out where the law specifically authorises them in connection with the role applied for.
- 7.2.4 **Legal claims** – we may process special category personal data where it is necessary for the purposes of establishing, exercising or defending legal claims, in reliance upon Article 9(2)(f) UK GDPR.
- 7.2.5 **Explicit consent** – in limited circumstances where no other condition under Article 9 applies, we may seek your explicit consent to process special category personal data, in reliance upon Article 9(2)(a) UK GDPR. Where we rely on explicit consent, we will make this clear at the point of collection. You may withdraw your consent at any time by contacting Recruitment.Operations@tlt.com, though this will not affect the lawfulness of any processing carried out before your withdrawal.

8 Profiling and automated decision making

- 8.1 Automated decision making is where a computer makes a decision about you with no human involvement. Profiling is where a system analyses your information to make predictions about you – for example, about your suitability for a role.
- 8.2 We do not make any significant decisions about your application – such as whether to progress it or offer you a role – based solely on automated processing. A person is always involved in making and taking responsibility for those decisions.
- 8.3 Where AI-assisted or automated tools are used to help with initial sifting or screening of applications, they support rather than substitute human judgement. A member of the recruitment team will always make the final decision on whether to progress an application.
- 8.4 If you believe an automated process has significantly affected a decision made about you, you have the right to request a human review, express your point of view and contest the outcome. Contact us at GDPR@tlt.com and we will arrange a review.

9 Who do we share your personal information with?

- 9.1 Where necessary and appropriate, we may share your personal information with the following:
- 9.1.1 **Internal teams** – including the HR and recruitment team, the hiring manager, and other relevant stakeholders in the business group in which you have applied to work.
- 9.1.2 **Assessment providers** – If you are required to complete an assessment as part of the application, your personal information will be shared with our third party assessment provider, Test Reach to administer it and obtain contextual information (where applicable). We will let you know about this during the recruitment process.
- 9.1.3 **Pre-employment screening providers** – If you are successful in your application, we will share your personal information with third party providers to obtain references, background checks, credit history checks and criminal record checks as part of the pre-employment screening process.

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- 9.1.4 **Our applicant tracking system and contextual recruitment provider** – we use a third-party system (Harbour ATS) to manage applications. Your personal information is stored in this system and accessible to the provider (3D MarComms) for the purpose of operating and maintaining it. We also use a third-party system (Dandi) to support our contextual recruitment process. Information provided as part of your application, including any contextual information, is shared with this supplier to support our contextual recruitment process and reporting.
- 9.1.5 **Regulators and law enforcement authorities** – including the Information Commission (IC) and other relevant bodies, where required or permitted by law.
- 9.1.6 **Our professional indemnity insurers and legal advisers** – where relevant to risk management or legal claims.
- 9.2 Where third parties process personal information on our behalf, we require them to act only on our instructions, maintain confidentiality, and put in place appropriate security measures.

10 Do we transfer your personal information outside the UK?

- 10.1 We do not generally store or transfer your personal information outside the UK.
- 10.2 Where a transfer is necessary – for example, to a service provider based outside the UK – we ensure that appropriate safeguards are in place before any transfer takes place. These may include:
- (a) UK Government adequacy decisions; or
 - (b) the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.
- 10.3 If you would like more information about the safeguards in place for any specific transfer, contact us at GDPR@tlt.com.

11 How long do we keep your personal information?

- 11.1 We only keep your personal information for as long as necessary for the purposes described in this notice and in line with our retention schedule. As a general guide:
- 11.1.1 **Assessment results** – kept for 12 months.
 - 11.1.2 **If your application is successful** – personal information collected during the recruitment process will form part of your personnel file and will be retained for the duration of your employment and, thereafter, for such further period as is required by our Retention Schedule.
 - 11.1.3 **If your application is unsuccessful** – we will keep your personal information for up to 12 months from the date your application closes so that we can consider you for other suitable vacancies during that period. If you ask us to delete your information before that period ends, we will confirm whether any consent you gave to retain your details is still in place.

12 Your rights

- 12.1 Under UK data protection law, you have a number of rights in relation to your personal information. These are summarised below. Some rights are subject to legal conditions and exemptions, but we will always explain these to you if they apply.

Your right	What it means
Access	You can ask for a copy of the personal information we hold about you.
Correction	You can ask us to correct information that is inaccurate or incomplete.
Erasure	In certain circumstances, you can ask us to delete your personal information.

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Restriction	In certain circumstances, you can ask us to limit how we use your information.
Objection	You can object to our use of your information where we rely on legitimate interests. You can always object to your information being used for direct marketing.
Portability	Where processing is based on consent or contract and carried out automatically, you can ask us to transfer your information to you or another organisation in a usable electronic format.
Withdraw consent	Where we rely on your consent, you can withdraw it at any time without any negative consequences.
Complain	You have the right to complain to the ICO at any time.

- 12.2 **How to exercise your rights:** Email Recruitment.Operations@tlt.com or GDPR@tlt.com, or write to us at the address in Section 14. There is normally no charge. We may ask you to confirm your identity before we respond. We will respond within one calendar month and will let you know if we need more time because your request is particularly complex.

13 How do we keep your personal information secure?

- 13.1 We take the security of your personal information seriously. We have put in place appropriate physical, technical and organisational measures to protect it against accidental loss, unauthorised access, misuse or alteration – including access controls, secure servers within the UK, and staff training. Access is limited to members of staff involved in the recruitment process for the specific role you have applied for.
- 13.2 If we ever experience a data breach that is likely to put your rights at serious risk, we will notify you and the ICO where required to do so by law.

14 How to contact us or make a complaint

- 14.1 If you have any questions about this notice or want to exercise your rights, please contact:
- 14.1.1 **Recruitment team:** Recruitment.Operations@tlt.com
- 14.1.2 **Data Protection Officer:** GDPR@tlt.com
- 14.1.3 **Post:** Data Protection Officer, TLT LLP, One Redcliff Street Bristol BS1 6TP
- 14.2 If you are unhappy with how we have handled your personal data, we would welcome the chance to put things right. You can raise a complaint using the contact details above, through our [online complaints form](#), or in another format if you need assistance or reasonable adjustments.
- 14.3 We will acknowledge your complaint within 30 days, may ask you to confirm your identity or clarify the issues, and will keep you updated while we investigate and respond. We may not be able to disclose certain information where this would affect confidentiality, legal professional privilege or the rights of others. You can read our [Data Protection Complaints Policy](#) for more detail.
- 14.4 If you are based in the UK, you also have the right to complain to the Information Commissioner's Office (ICO) at any time. The ICO can investigate complaints and take enforcement action. Find out more at www.ico.org.uk. We would, however, prefer the chance to resolve your concerns before you go to the ICO.
- 14.5 If you live outside the UK, you can complain to your local regulator.

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15 Updates to this notice

- 15.1 We review this notice regularly and will let you know about any significant changes — for example, by updating this notice on our website. This version was last updated in **July 2026**.
- 15.2 If your personal details change during the recruitment process, please let us know so that we can keep our records accurate.