

How we use your personal data: Early Careers Privacy Notice

This Early Careers Applicant Privacy Notice outlines the information we hold about the people who apply to work at Bird & Bird and how we handle that data.

What does this notice cover?

This Early Careers Privacy Notice describes how Bird & Bird LLP and any of our subsidiaries in England (collectively, "**Bird & Bird**" "**us**" or "**we**") use your personal data in connection with your attendance at or participation in our bursary scheme, a vacation scheme placement, open days, insight schemes or any other early career scheme, and your application for all of the above and/or a training contract. It also describes your data protection rights, including a right to object to some of the processing which Bird & Bird carries out. More information about your rights, and how to exercise them, is set out in the "Your choices and rights" section. Please note that once you have commenced a training contract with us, the applicable privacy notice will be our employee privacy notice, which will be made available to you.

We also may provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

If you use MyLocker to apply for a role with us, we are the responsible data controller of the copy of the personal data which we receive from MyLocker as part of an application ("**Bird & Bird Data**"). AllHires is the responsible data controller for the "master copy" of your personal data which is held in the MyLocker service itself ("**Master Data**"). You should direct queries and requests as follows:

- to AllHires, if it is about Master Data (if we receive your query or request, we will refer it to AllHires); and
- to us, if it is about Bird & Bird Data (any queries or requests concerning Bird & Bird Data made to AllHires will be referred to us) – please use the details set out in the "Your choices and rights" section below

What personal data do we collect?

- **Personal identification, regulatory and communication information:** contact information (such as your name, address, phone number and email address), gender, immigration status, information about your entitlement to work, your picture and identification details;
- **Application-related information:** application numbers, previous work experience, , education history and transcripts, qualifications and skills information, interests and aspirations, background screening information (where relevant), information about your performance in recruitment assessments, video interview footage and any other information you submit to us, including any correspondences you may have with us during the application process.
- **Contextual recruitment information:** where you choose to participate in contextual recruitment only, information about your socio-economic background and related contextual recruitment information, including unique identification number, postcode at aged 16, examination grades, education history, eligibility for free school meals between ages 11-16, whether you are the first generation in your family to go to university, whether you regularly undertake or undertook paid work during term time, have been in local authority care, were a parent before the age of 21, have been a registered carer at any age or whether they are a refugee/asylum seeker, coupled with the fact that you have applied to Bird & Bird and the information you provide in the “contextual information” section of your application.
- **Sensitive information:** for example, information about your health and disabilities where we need to make any reasonable adjustments or equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, dietary requirements and religion or belief where you choose to provide this information. Diversity and inclusion data may be provided by you on a voluntary basis. If this is the case, the supplier system that we use presents this to us in an anonymized format. We will not run reports on a data set that allows us to connect any diversity and inclusion data to a particular individual.

We collect most of this information from you directly. For example, data is collected through our application portal; from correspondence with you; or through interviews, meetings or other assessments.

We also collect some information about you from other sources, where permitted. This includes information through your contact with or from third parties, including recruiters, clients, employment research firms, educational establishments, organisations which help us with our diversity and inclusion initiatives (including contextual recruitment services), identity verification services, occupational health providers, the references you provide to us, websites and other publicly accessible information on the Internet. Where permitted, we may request background or credit checks from public authorities or financial institutions to evaluate your eligibility for

employment or certain Bird & Bird positions or projects.

Why we collect, use and store your personal data

We collect, use and store your personal data for the reasons set out below.

- **Where this is necessary for Bird & Bird to enter into a contract with you:**
 - To make informed decisions on recruitment and assess your suitability for the role;
 - To communicate with you about your application, respond to your inquiries and schedule interviews, appointments and phone calls; To verify the details you have supplied ; and
 - To reimburse you for any agreed expenses incurred in the application process where applicable.

Where we collect personal data which is necessary to enter into a contract with you for a vacation scheme or a training contract, this is mandatory and we will not be able to manage your application process without this information.

- **Where necessary for Bird & Bird's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:**
 - To improve our recruitment process and activities;
 - To manage third party service providers;
 - To send notices to you about open positions at Bird & Bird;
 - To conduct background checks which may include verification of skill proficiency, criminal history (for related positions), financial history and other information that may be necessary for determining your qualifications and eligibility or as requested by Bird & Bird's clients or to protect our reputation (where this is not required to enter into a contract with you);
 - To protect the security of Bird & Bird's premises, assets, systems, and intellectual property, enforce company policies and permit the functionality of our online portal, including to authorise the creation of online accounts and reset passwords, and to protect our employees;
 - To comply with non-UK laws and protect Bird & Bird's legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements;
 - To respond to requests from any UK governmental or regulatory authority (where we are not legally obliged to comply or respond to the request under law applicable in the UK); and
 - To assign or subcontract, procure goods or services for, or to outsource any part of our recruitment functions to third parties, such as application system providers.

Where we process personal data on this basis, then – as required by data protection law – we have carried out a balancing test to document our

interests, to consider what the impact of the processing will be on individuals and to determine whether individuals' interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details at the end of the notice.

- **Where you have given consent:**
 - To collect, use and share contextual recruitment information so that your application can be reviewed in the context of your socio-economic background (e.g. so we can consider whether you overachieved in light of your wider personal circumstances); and
 - To collect and use equal opportunities monitoring information so that *we can analyse and monitor the diversity of applicants* (where applicants choose to participate).

We may provide you with more specific notices for some of the processing described above. If we require your consent, we will ask for this at the time we collect your personal data. You can withdraw your consent at any time through the means indicated when we collect it, or by contacting us as set out below. We will also tell you what the consequences are if you withdraw your consent.

How we share your personal data

Personal data will primarily be processed by employees in our Human Resources, Professional Practice, Risk and Compliance, IT and Finance, and Facilities departments. It will also be shared across Bird & Bird when necessary for business purposes, e.g. it will be provided to individuals within the relevant practice group if you apply for a practice-specific role.

We share personal data with third party organisations that provide us with services, including:

- technology service providers, for hosting, maintenance, administration and analysis;
- recruitment service providers, for application management or assessment systems and services, including video interviews;
- support and/or services concerning our diversity initiatives, including contextual recruitment activities;
- and
- agencies conducting background checks and organisations (where applicable).

In the event that Bird & Bird or its business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

If your personal data is transferred outside of the UK or the EEA to an organisation in a country which is not subject to an adequacy decision by the EU Commission, or an equivalent UK authority, or which is considered adequate as determined by applicable data protection laws, we will take steps to ensure your personal information is adequately protected (e.g. by way of EU Commission or UK approved Standard Contractual Clauses, Binding Corporate Rules or by relying on such other

data transfer mechanisms as available under applicable data protection laws). A copy of the relevant mechanism can be obtained for your review on request by using the contact details below.

Verification and background checks

For certain positions, it will be necessary for us to verify the details you have supplied and to conduct pre-employment background checks. The level of checks will depend on your role, in particular whether you will occupy a regulated role, and will be conducted at as late a stage as is practicable in the recruitment process and often only after you have been selected for the position. Some of this data will be supplied to us directly by you or on your behalf and some will be accessed and/or provided by our third party screening providers. Such data may include:

- contact information such as name, phone number, email address, street address;
- personal information such as Government ID, social security number, driver's license number, immigration data (including Passport number), date of birth, age, gender, photos / images, education information, CVs / references, family information;
- administrative information such as performance evaluation, management information re. course transcripts, certifications, assessments, etc.
- financial/benefit information;
- sensitive information such as health information, sexual orientation, gender identification and expression, racial and ethnic origin, religious beliefs, professional/trade union/ works council memberships, Political Opinions, Disabilities, Criminal convictions, Financial stability, Political contributions, Charitable contributions, Biometric/Genetic Information and/or Location data; and
- log in data.

How long will we retain your personal data

If you are successful: we will retain your personal data only for as long as we need it for Bird & Bird's legitimate interest in accordance with applicable law, for the purposes of the recruitment process and, once this process is finished, for an appropriate period so as to be able to deal with any legal claims linked to the application process. Recruitment records for successful applicants are generally kept for 3 years. After this period, we will take steps to delete your personal data or hold it in a form that no longer identifies you. If you are hired for a position at Bird & Bird relevant personal information you provide will become a part of your employee file and may be used later for the management of the employment relationship.

If you are not successful: we will retain your personal data with your permission for 2 years so we can keep you in mind for future recruitment processes.

Your choices and rights

If you have any questions about our information handling practices or if you wish to access your personal information you should contact privacy@twobirds.com

You have the right to ask Bird & Bird for a copy of your personal information; or to correct, delete or restrict processing of your personal information; or to receive a copy of your personal information in a structured, machine-readable format.

In addition, you can object to the processing of your information in some circumstances and, where we have asked for your consent, you may withdraw it at any time.

These rights may be limited in some circumstances, for example if fulfilling your request would reveal personal information about another person, if we have compelling legitimate interests, or if you ask to delete information which we are required by law to keep.

If, after contacting us, you have unresolved concerns, you have the right to complain the Information Commissioner's Office: www.ico.org.uk.

Changes to this privacy notice

This Privacy Notice may be updated periodically to reflect changes in our data practices. We will post a notice on our applicable websites or applications to advise of any significant changes to our Privacy Notice and indicate in the notice when it was most recently updated.

April 2022