**FIVE PAPER – PUPILLAGE** **RECRUITMENT DATA POLICY**

*(Approved by the EC on 17 October 2018)*

1. The members and staff of Five Paper and the members of Five Paper’s Pupillage Committee for the time being (together referred to herein as “**Five Paper**”) are data controllers within the meaning of the General Data Protection Regulation.
2. The contact details for Five Paper and Five Paper’s Pupillage Committee are as follows:

Address: Five Paper

5 Paper Buildings

Temple

London

EC4Y 7HB

Website: www.fivepaper.com

Telephone: 020 7815 3200

Email: pupillage@fivepaper.com

**Purpose for which data is processed**

1. Five Paper processes the personal data of applications for pupillage solely for the purpose of conducting a recruitment process for a pupil or pupils (as applicable) in accordance with Five Paper’s Selection Policy.
2. That process includes marking Application Forms, inviting applicants to interview, interviewing applicants, making offers of pupillage, entering into contracts for pupillage with applicants, and recording and analyzing equality and diversity monitoring data solely on an anonymous basis.

**Legal basis for the processing of data**

1. All applicants for pupillage are requested to consent to the processing of their data for the purpose of Five Paper conducting a recruitment process for a pupil or pupils (as applicable) by signing a declaration in the Application Form.
2. Further, and in any event, it is necessary that Five Paper process the data of applicants for pupillage for the purpose of Five Paper’s legitimate interests.
3. Those legitimate interests include, but are not limited to:
	1. Carrying out a recruitment process in accordance with Five Paper’s Selection Policy;
	2. Conducting a fair recruitment process in compliance with Five Paper’s legal obligations pursuant to, *inter alia*, the Equality Act 2010;
	3. Recording and analyzing equality and diversity monitoring data, solely on an anonymous basis;
	4. Dealing with any complaints arising out of the recruitment process.

**Recipients of personal data**

1. Five Paper is the only recipient of your personal data.
2. Five Paper receives data directly from applicants for pupillage.
3. Five Paper may obtain data about an applicant for pupillage from third party public sources, such as social media and internet searches.
4. All offers of pupillage are conditional upon receipt of satisfactory references from three referees. Five Paper will therefore also obtain personal data about applicants for pupillage to whom an offer of pupillage is made, and which is accepted, from the referees listed by the applicant in their Application Form.

**Retention period**

1. Five Paper will store the personal data of applicants for pupillage to whom an offer of pupillage is not made for not more than six months following the day on which pupillage offers are made.
2. Five Paper will store the personal data of applicants for pupillage to whom an offer of pupillage is made, but which is withdrawn and/or not accepted for any reason, for not more than six months following the day on which the applicant rejects the offer of pupillage.
3. Five Paper will store the personal data of applicants for pupillage to whom an offer of pupillage is made, and which is accepted, for a period of seven years from the date on which the applicant enters into a contract for pupillage with Five Paper.

**Your rights**

1. You have the right to request from Five Paper access to and rectification or erasure of personal data, or restriction of processing of data concerning yourself, or to object to processing, and the right to data portability.
2. Where Five Paper solely relies upon your consent to process data, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing of that data based on your consent before you withdrew the same.
3. You have the right to lodge a complaint with a supervisory authority.
4. The provision of your personal data is a requirement necessary to enter into a contract for pupillage with Five Paper. You are obliged to provide the personal data requested in Five Paper’s Application Form. The possible consequences of you failing to provide such data are that you will not be invited to interview and/or that you will not be offered pupillage and/or that Five Paper will not enter into a contract for pupillage with you following the acceptance of an offer of pupillage.