

## PRIVACY NOTICE

(How we use employee and job applicant personal data)

This notice explains what information Thompsons Scotland LLP collects, when we collect it and how we use this. During our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will process your information.

We are committed to a policy of protecting the rights of individuals with respect to processing their personal data and take the issue of security and data protection very seriously. We comply with all relevant data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018, the Data Use and Access Act 2025 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number **ZB695873** and we are the data controller of any personal data that you provide to us.

Our Data Protection Lead is Laura Connor. Our Data Protection Officer (DPO) is RGDP LLP, who can be contacted by email as follows: [info@rgdp.co.uk](mailto:info@rgdp.co.uk).

Any questions relating to this notice and our privacy practices should be sent to the following address: [GDPR@thompsons-scotland.co.uk](mailto:GDPR@thompsons-scotland.co.uk).

HR queries about your records can be directed to [HR@thompsons-scotland.co.uk](mailto:HR@thompsons-scotland.co.uk).

We collect the following information from you through a variety of resources (i) directly from you; and/or (ii) from third parties (including recruitment agencies, Government agencies and previous employers):

- Name,
- Date of Birth,
- Address,
- Telephone Number,
- E-mail address,
- NI number,
- Personal characteristics such as gender and ethnic group,
- Qualifications,
- References,
- Medical information,
- Absence information,

- Next of kin,
- Emergency contact information,
- Pension information,
- Information regarding your criminal history,
- Information about your previous employment history,
- Identification (passport, driving license),
- Personal tax information, and
- Bank account information.

We collect and use the above information and personal data for:

- HR Administration (including maintaining personnel records and managing policies and procedures)
- Onboarding and offboarding (including recruitment and selection)
- Absence and leave management
- Payment of salaries
- Pensions and associated benefits, appraisal, training, and development
- Membership of professional bodies

Where we receive information about you from third parties (such as recruitment agencies, referees or prior employers), we will only do so where lawful and we will take reasonable steps to ensure you are aware of the source and the information provided.

### **What are the lawful bases for us processing your personal data?**

Under the UK General Data Protection Regulation, the lawful bases which we rely on for processing this information are:

- We have your consent
- We have a contractual obligation, including pre-contractual negotiations
- We have a legal obligation
- We have a vital interest
- We have a legitimate interest

Where we process special category data (such as health information or equality monitoring data), we do so where necessary for employment, social security and social protection purposes and/or to comply with our legal obligations, together with appropriate safeguards under the Data Protection Act 2018.

Where we process criminal conviction and offence data, we do so only where authorised by law and where it is necessary for employment-related purposes, with appropriate safeguards in place.

We may disclose to and share information about you with third parties for the purposes set out in this notice, or for purposes approved by you, including the following:

- HR system and HR support providers (including Cezanne HR)
- Payroll providers and related benefits administrators
- Pension providers and scheme administrators
- Recruitment agencies and referees (for recruitment purposes)
- Occupational health and wellbeing providers (where applicable)
- Training providers and professional bodies (where relevant to your role)
- IT and cloud service providers who support our systems (subject to appropriate safeguards)
- Regulators, law enforcement and public authorities where we are legally required to share information
- If we enter into a joint venture with or are sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.

Your information will only be stored within the UK, other than where international transfers of personal data may legally take place, in accordance with Chapter V of the UK General Data Protection Regulation.

When you give us information, we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is appropriate security for all locations that data is stored, and we ensure that these measures are tested on a regular basis to ensure compliance.

We do not make decisions about you based solely on automated processing where this produces legal effects or similarly significant effects.

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

**Your rights:**

Under data protection law, you have certain data subjects' rights including:

- |                              |   |
|------------------------------|---|
| Your right of access:        | You have the right to ask us for copies of your personal information  |
| Your right to rectification: | You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete |

Your right to erasure: You have the right to ask us to erase your personal information in certain circumstances

Your right to restriction of processing: You have the right to ask us to restrict the processing of your personal information in certain circumstances

Your right to object to processing: You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability: You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold or wish to exercise any of your above rights, please contact us at [GDPR@thompsons-scotland.co.uk](mailto:GDPR@thompsons-scotland.co.uk).

You have the right to complain to the Information Commission in relation to our use of your information.

Information Commissioner's Office - UK  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF  
Telephone: 0303 123 1113

The accuracy of your information is important to us – please help us keep our records updated by informing us of any changes to your personal and contact details by emailing [HR@thompsons-scotland.co.uk](mailto:HR@thompsons-scotland.co.uk).

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Policy Owner:	<a href="mailto:GDPR@thompsons-scotland.co.uk">GDPR@thompsons-scotland.co.uk</a> / Laura Connor