

This is our privacy notice explaining how we use your personal information if you apply for a job with Lowell

Select the headings below to find out how we use your personal information, who we may share it with and how we protect it, as well as your rights and how to exercise them.

If you would like a copy of this privacy notice or if you have any questions about how Lowell UK Shared Services Limited, Lowell Group Shared Services Limited, Lowell Financial Limited or Overdales Legal Limited use and share your personal information, please contact our Data Protection Officer by:

- email at dpo@lowellgroup.co.uk
- letter at Data Protection Officer, Lowell Financial Limited, PO Box 13079, Harlow, CM20 9TE

Our Data Protection Officer deals with data protection for all our UK companies, so whichever Lowell company your question, concern or complaint relates to, please contact our Data Protection Officer using these contact details.

- [Who are we?](#)

You are applying for a job with one of the UK Lowell companies:

Company	Lowell UK Shared Services Limited	Lowell Group Shared Services Limited	Lowell Financial Limited	Lowell Solicitors Limited	Overdales Legal Limited
Company number	08336897	08647094	04558936	08647091	07407310
Country	Incorporated in the UK				
Registered office	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH	No.1 The Square, Thorpe Park View, Thorpe Park, Leeds, LS15 8GH

Where we use “**Lowell**”, “**we**”, “**our**” or “**us**” in this notice, we mean Lowell UK Shared Services Limited, Lowell Group Shared Services Limited, Lowell Financial Limited, and Overdales Legal Limited unless we say otherwise.

Lowell UK Shared Services Limited deals with talent acquisition, onboarding of new employees and general HR matters for Lowell UK Shared Services Limited, Lowell Group Shared Services Limited, Lowell Financial Limited, Lowell Solicitors Limited and Overdales Legal Limited, so if you speak to or receive communication from a member of our talent acquisition, onboarding or other HR teams, it will usually be Lowell UK Shared Services Limited that you are dealing with.

If you apply for a role with Lowell UK Shared Services Limited, Lowell UK Shared Services Limited will be the controller of your information.

As Lowell UK Shared Services Limited deals with talent acquisition, onboarding and other HR matters for all our UK companies, this means that Lowell UK Shared Services Limited and the company you are applying to will be joint controllers of your information which means that both organisations are responsible for looking after your information.

- [**What information do we collect about you?**](#)

We collect:

- your name (including any previous names and the dates when you were known by these names)
- your contact details (including your current and previous addresses for the last 7 years, telephone numbers and e-mail addresses)
- your gender
- your date of birth
- your National Insurance number
- evidence of your right to work in the UK including information about your immigration status (where relevant), such as copy of your passport (including biometric data if you use your smartphone to scan the chip in your passport when using the Experian, please see the section What employment checks do we carry out? below for further details, full birth certificate, visa, National Identity cards or biometric residence permit
- proof of your current address, such as a bank or credit card statement or utility bill
- your work history and other relevant experience
- evidence of your work history and other relevant experience, including documents evidencing payment of your salary or wages or payment of tax such as a P60 or HMRC tax report and where necessary, your employee number with your previous employers
- where you have been out of work for an extended period of time, we may also ask for evidence relating to income you received during that period, such as Universal Credit or a Carer’s Allowance
- your education including degrees awarded, transcripts and other information provided in support of your application
- your qualifications
- details of any professional memberships
- your current salary and benefits package

- information collected during telephone screenings and interviews and any assessment centres you may attend, including the results of any language or technical tests you take or psychometric assessments carried out and CCTV images if you attend our offices,
- details of your character referee, including their name, address and occupation
- details of your emergency contact, including their name, their relationship to you and their contact details
- dates of any holidays you have already planned
- details of any accounts you have with any member of the Lowell group (including but not limited to Lowell Portfolio I Ltd, Lowell Financial Ltd and Overdales Legal Limited)
- information about your current financial status, including details of any financial defaults, unsatisfied county court judgments (CCJs), individual voluntary arrangements (IVAs), or any other undischarged bankruptcy proceedings
- details of potential conflicts of interests you may have, including whether you have previously worked for an auditor of HSBC or whether a member of your family currently works for any company in the HSBC group
- recordings of our calls with you
- any other information contained in your CV or which you provide during the talent acquisition process

We may collect information about your mental and physical health where we need to do so to make reasonable adjustments to the talent acquisition process for you. For more details about how we use this information, please see the section Special categories of personal data below.

Given the nature of our business, we ask you to tell us about any criminal convictions you may have and we carry out a criminal records check as part of our pre-employment checks. For more details about how we use this information, please see the sections What pre-employment checks do we carry out? and Information relating to criminal convictions below.

If you accept a role with us, please see our Colleague privacy notice for details of what information we collect about you as our colleague and how we use, store and protect that information.

If you are also a customer of Lowell, please see our Customer privacy notice for details of what information we collect about you as our customer and how we use, store and protect that information.

For details about the information we collect about you through our website, please see our Website User privacy notice and our Cookie notice.

- [**What pre-employment checks do we carry out?**](#)

As part of our talent acquisition process, we will confirm the information you provide to us by contacting your former employers and your university or further education establishments. We will also ask for references for either the last two years or the last five years depending on the role you apply for. We may also ask for character references in some circumstances. We may collect publicly accessible information about you, for example through a Google search, to make sure that you are suitable for the role you are applying for.

We also use Experian to carry out the following checks on you if you accept an offer of employment with Lowell:

- right to work checks
- adverse financial checks
- a basic or enhanced criminal record check depending on your role.

Right to work checks

We need to confirm that you have a right to work in the UK. We may do that in person by checking your documentation or remotely using Experian to perform these checks for us. You can use Experian's self-service app to provide your passport number (or you may be able to use your smartphone to scan the chip in your passport) or birth certificate and National Insurance number which Experian will compare to their identity verification database or with the Home Office to confirm that you have a right to work in the UK. If you have a visa, they will also tell us the amount of time remaining before your visa expires. If you can't use the app, we may send the information to Experian for you.

Adverse financial checks

These checks confirm whether there is any adverse data recorded on your credit file relating to defaults, CCJs (or similar judgments from other courts), voluntary arrangements or bankruptcy. This check is called a 'soft search' and may leave what is known as a "soft footprint". This means that it is not visible to any other organisations and will not affect your credit score. It can only be seen by you, us and the credit reference agency and will show as account administration on your credit file.

Criminal record check

Experian will also use the services of the Disclosure and Barring Service to undertake on your behalf, a criminal record check which details unspent convictions under the Rehabilitation of Offenders Act 1974 to verify the information you provide us in your application form. If you have worked overseas in the last 5 years, Experian will also do an overseas criminal check on you.

For more details about Experian and how it uses and shares personal information, please see the section Where do we get your information from? below and www.experian.co.uk/privacy-policies.html. More information about the Disclosure and Barring Service is available at www.gov.uk/government/organisations/disclosure-and-barring-service.

Depending on the type of role you accept with Lowell, we may also use Experian to carry out:

- a check of the electoral roll
- a director's search at Companies House
- a sanctions check
- a Financial Conduct Authority check

- a media check

The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the [Cifas privacy notice](#).

Before we carry out any checks (other than contacting your former employers and your university or further education establishments to confirm the information you have provided and your referees and character referees), we will send you our Background Check form for you to complete which will explain which checks we intend to carry out.

Depending on the type of role you accept with Lowell, we may update the employment screening checks on you from time to time.

- [Where do we get your information from?](#)

<p>Information that you give us</p>	<p>You give us information about yourself, your work experience and other relevant experience, your education, your qualifications and your circumstances:</p> <ul style="list-style-type: none"> • by completing our online application form • in any telephone screenings and interviews and any assessment centres you may attend • in any communications with us by telephone, email, post, social media or otherwise • by visiting our website, setting up an online account through our website and filling in forms on our website. <p>Please see our Website User privacy notice and our Cookie notice for details of the information we collect through our website.</p>
<p>Information that we collect about you</p>	<p>We may collect information about you that is publicly accessible, for example:</p> <ul style="list-style-type: none"> • through a Google search • news and social media reports • entries in online directories • information which is available at Companies House and

	<ul style="list-style-type: none"> • information which is available from the Financial Conduct Authority <p>When you visit our website, we collect information about you and the way you use our website. Please see our Website User privacy notice and our Cookie notice for details of the information we collect through our website.</p>
<p>Information that we receive from recruitment agents</p>	<p>If we receive your application through a recruitment agent, they will send us the following information:</p> <ul style="list-style-type: none"> • your name • your contact details (including your address, email address and telephone numbers) • details of the role you are applying for with Lowell • details of your current salary and benefits package • the information contained in your CV • evidence of your right to work in the UK and • any other information provided to support your application
<p>Information that we obtain from your previous employer(s)</p>	<p>We obtain information from your previous employers to confirm the information that you have provided us with. This includes:</p> <ul style="list-style-type: none"> • the dates of your employment • your job title and role • details of your responsibilities • your reasons for leaving your previous role • whether your previous employer would employ you again • whether your previous employer is aware of anything about you that would mean that you are not suitable for the role that you are applying for with Lowell • any other information provided by your previous employer in the reference they provide for you and • any other information provided to support your application

<p>Information that we obtain from the university and other further education establishments you have attended</p>	<p>We obtain information from the university and other further education establishments you have attended to confirm the information that you have provided us with. This includes:</p> <ul style="list-style-type: none"> • the dates of your enrolment • the courses you studied • any qualifications you obtained • whether they are aware of anything about you that would mean that you are not suitable for the role that you are applying for with Lowell and • any other information provided to support your application
<p>Information that we obtain from your character referee</p>	<p>We collect information from your character referee so that we can confirm that you are suitable for the role with Lowell that you are applying for. This includes:</p> <ul style="list-style-type: none"> • how you know each other • how long you have known each other • whether they are aware of anything about you that would mean that you are not suitable for the role that you are applying for with Lowell
<p>Information that you ask us to collect from third parties</p>	<p>If you specifically ask us to collect information from a third party, we will do so in accordance with your request, which we may ask you to put in writing.</p>

**Information
that we obtain
from Experian**

We use Experian to carry out pre-employment checks about you.

Experian is a credit reference agency. Credit reference agencies (or CRAs) hold personal information about individuals. Most of the personal information they hold relates to how you have maintained your credit accounts. They also hold address details and information taken from public sources, such as the electoral roll, public records including CCJs and bankruptcy and insolvency information. If you are financially associated with another person (which means that you have a joint credit account or mortgage with them), we will receive financial information relating to that association.

Experian will provide us with details of any of the following which are recorded on your credit file:

- financial defaults
- CCJs (or similar judgments from other courts)
- IVAs
- any other undischarged bankruptcy proceedings

This check is called a 'soft search' and may leave what is known as a "soft footprint". This means that it is not visible to any other organisations and will not affect your credit score. It can only be seen by you, us and the credit reference agency and will show as account administration on your credit file.

Experian has put together an information notice which explains in more detail, how Experian uses and shares personal information about you which is available at www.experian.co.uk/privacy-policies.html.

In some circumstances, Experian may also process some of the references we obtain, including:

- education references where the education provider charges a fee for providing the reference
- references which are not provided in English and need to be translated

For details about the information we share with Experian, please see [Who do we share your information with?](#)

Experian will also use the services of the Disclosure and Barring Service to undertake on your behalf, a criminal record check which details unspent convictions under the Rehabilitation of Offenders Act 1974 to verify the information you provide us in your application form.

More information about the Disclosure and Barring Service is available at www.gov.uk/government/organisations/disclosure-and-barring-service and the section [Information relating to criminal convictions](#) below.

	<p>Experian may also carry out right to work checks on our behalf. For more details, please see the section What employment checks do we carry out? above for further details.</p>
<p>Information that we may obtain from Cifas</p>	<p>The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the Cifas privacy notice.</p>
<p>Information that we obtain from regulatory bodies</p>	<p>If you are a member of a regulated profession, such as a solicitor, we may obtain information from your regulatory body or professional association such as The Law Society.</p> <p>If you have previously held a role as an approved person or you are applying for such a role with Lowell, we may also obtain information from the Financial Conduct Authority.</p>
<p>Information that we receive from other companies in the Lowell group</p>	<p>We may receive information about you from other members of the Lowell group of companies:</p> <ul style="list-style-type: none"> • so that Lowell UK Shared Services Limited is able to provide talent acquisition and other HR related services to Lowell Financial Limited, Lowell Group Shared Services Limited, Lowell Solicitors Limited and Overdales Legal Limited • for our internal administrative purposes including creating and analysing management information and HR reports • to monitor our compliance with our legal, professional, regulatory and other corporate governance obligations

<p>Call recording</p>	<p>We may monitor and/or record calls for the purposes of resolving issues with your application, training and improving our quality and service standards.</p> <p>For details of when we may share call recordings with third parties, please see the section Who do we share your information with? below.</p>
<p>CCTV images and building access</p>	<p>We operate CCTV at all of our premises. If you visit any of our offices, you may be recorded by our CCTV system.</p> <p>For details of when we may share CCTV images with third parties, please see the section Who do we share your information with? below.</p> <p>We may also collect information about your visit to our premises if you attend any of our premises for interview.</p>

We may combine the information that you give us with the information we collect about you from the other sources listed above.

- **[Why do we need your information?](#)**

We need your information in order to process and evaluate your application and to decide whether you are suitable for the role that you are applying for. This includes:

- identifying and evaluating individuals who have applied for a role with us
- assessing your skills, qualifications and experience
- verifying the information that you have provided to us
- carrying out our pre-employment checks (for more details please see the section [What pre-employment checks do we carry out?](#) above)
- communicating with you about the talent acquisition process and your application

We do this to take steps which are necessary for us to enter into an employment contract with you.

We also use your information to comply with our legal, regulatory, professional and other corporate governance obligations, for example:

- the Financial Conduct Authority requires us to carry out certain pre-employment checks on individuals applying for senior management and other roles
- to comply with our obligations under the right to work legislation
- to make sure that we treat everyone fairly and equally as required by the equal opportunities legislation
- to comply with our obligations under the anti-money laundering and counter-terrorist financing legislation and for crime and fraud prevention.

Please see the sections [Special categories of personal data](#) and [Information relating to criminal convictions](#) for more details.

Please see our [Website User](#) privacy notice and our [Cookies](#) notice for details of the information we collect through our website and why we need it.

If you don't provide us with relevant information, we will not be able to proceed with your application which means that we will not be able to consider you for the role you are applying for with us.

- [Special categories of personal data](#)

Under the data protection laws, information revealing the following are “**special categories of personal data**”:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic information
- biometric information
- information concerning health (including mental and physical health) or
- sex life or sexual orientation.

We are committed to providing equal opportunities in all areas of talent acquisition, employment, training and progression to everyone applying for a role with Lowell.

We collect information relating to:

- racial or ethnic origin
- religious or philosophical beliefs
- information relating to disability
- information relating to sexual orientation,

to make sure that we are meeting our commitment and complying with our obligations under the equal opportunities legislation. We do this on the basis that this is in the substantial public interest.

Experian may collect biometric information held within your passport if you use the Experian self-service app to complete the right to work checks remotely and you use your smart phone to scan the chip in your passport.

We may collect information about your physical or mental health in order to make reasonable adjustments for you during the talent acquisition process. We only collect the minimum amount of information we need to make such adjustments. We collect this information in order to comply with our obligations as an employer under the equal opportunities legislation.

If we believe you are in immediate danger, including due to a medical emergency, we may process information relating to your physical and mental health conditions (including sharing this information with the emergency services and your emergency contacts) on the basis that it may be a life and death situation.

We do not collect special categories of personal data for any other purpose during the talent acquisition process.

- **[Information relating to criminal convictions](#)**

Given the nature of our business, we ask you to tell us about any criminal convictions you may have and we carry out a criminal records check as part of our pre-employment checks.

Experian use the services of the Disclosure and Barring Service to undertake on your behalf, a criminal record check which details unspent convictions under the Rehabilitation of Offenders Act 1974 to verify the information you provide us in your application form. If you have worked overseas in the last 5 years, Experian will also do an overseas criminal check on you.

For more details about Experian and how it uses and shares personal information, please see the section Where do we get your information from? above and www.experian.co.uk/privacy-policies.html. More information about the Disclosure and Barring Service is available at www.gov.uk/government/organisations/disclosure-and-barring-service.

We may also use the information we collect about your criminal convictions for the purposes of crime and fraud prevention and for complying with our obligations under the anti-money laundering and counter-terrorist financing legislation.

We only collect the minimum amount of information about your criminal convictions that we need for the purposes of determining whether you are suitable for the role that you are applying for with Lowell.

We collect information about your criminal convictions on the basis that we are required to do so to comply with our legal, professional, regulatory and other corporate governance obligations as an employer and particularly as employers authorised by the Financial Conduct Authority and Solicitors Regulation Authority.

The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the Cifas privacy notice.

Where we use information about your criminal convictions and share it with third parties for the purposes of complying with our obligations under the anti-money laundering, counter-terrorist financing and other legislation, we do so on the basis that this is necessary for us to comply with our legal obligations.

We will retain information relating to your criminal convictions for no more than 6 months from the end of the talent acquisition process for the role which you are applying for with Lowell; although we will keep the outcome of the criminal records check we carry out for up to 12 months. For further details of how long we will keep your information, please see the section How long do we keep your information for? below.

- [Who do we share your information with?](#)

We sometimes need to share some of your information with other organisations.

<p>Information that we share with other companies in the Lowell group</p>	<p>We may share your information with other members of the Lowell group of companies:</p> <ul style="list-style-type: none"> • so that Lowell UK Shared Services Limited is able to provide talent acquisition and other HR related services to Lowell Financial Limited, Lowell Group Shared Services Limited, Lowell Solicitors Limited and Overdales Legal Limited • for our internal administrative purposes including creating and analysing management information and HR reports • to monitor our compliance with our legal, professional, regulatory and other corporate governance obligations <p>As Lowell is a multi-national group of companies which operates in a number of EU countries, this may involve your information being shared with Lowell companies which are outside of the UK, although these companies are all based in the European Economic Area.</p>
<p>Information that we share with Experian</p>	<p>We share the following information with Experian so that Experian can carry out pre-employment checks for us:</p> <ul style="list-style-type: none"> • your name • your contact details (including your current and previous addresses, email addresses and telephone numbers) • the information you provide when completing our Background Check form that we will send to you if you accept an offer of employment with Lowell • information you provide to evidence that you have a right to work in the UK

	<ul style="list-style-type: none"> • copies of your references in circumstances where they process these for us. For more details of when Experian may process your references, please see the section Where do we get your information from? above. <p>Experian has put together an information notice which explains in more detail, how Experian uses and shares personal information about you which is available at www.experian.co.uk/privacy-policies.html.</p> <p>For more details, please see the section What pre-employment checks do we carry out? above.</p>
<p>Information that we may share with Cifas</p>	<p>The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. For more details about how your information will be used by us and Cifas, please see the Cifas privacy notice.</p>
<p>Information that we share with law enforcement and emergency services</p>	<p>If we identify evidence of fraud, money laundering or any other crime (whether financial or otherwise) in relation to your application, including where you have been the victim of identity theft, we will share those details with the police, the National Crime Agency and other law enforcement agencies. We may also share information with HM Revenue and Customs where appropriate.</p> <p>Where relevant we may also share CCTV images and call recordings with the police, the National Crime Agency and other law enforcement agencies.</p>
<p>Information that we share with regulatory authorities</p>	<p>Lowell Financial Ltd and Overdales Legal Limited are authorised by the Financial Conduct Authority. This means that we are required to report certain things to the Financial Conduct Authority which may mean sharing information about you if your role means that you will be an approved person and that you will need to be approved by the Financial Conduct Authority.</p> <p>Lowell Solicitors Limited and Overdales Legal Limited are authorised by the Solicitors Regulation Authority. This means that we are required to report certain things to the Solicitors Regulation Authority which may mean sharing information about you in relation to your application.</p> <p>We are registered with the Information Commissioner’s Office and if you make a complaint to them, we may have to share information about you.</p> <p>Where appropriate, we may share CCTV images and call recordings with these organisations.</p>

<p>Information that we share with regulatory bodies and professional associations</p>	<p>If you are a member of a regulated profession, such as a solicitor, we may share information with your regulatory body or professional association such as The Law Society.</p> <p>If you have previously held a role as an approved person or you are applying for such a role with Lowell, we may also share information with the Financial Conduct Authority.</p>
<p>Information that we share with your previous employer(s) and the university and other further education establishments you have attended</p>	<p>We may share some limited information with your previous employer(s) and the university and other further education establishments you have attended in order to verify the information which you have provided to us about your work history, education and qualifications.</p>
<p>Information that you ask us to share with third parties</p>	<p>If you specifically ask us to share information with a third party, we will do so in accordance with your request, which we may ask you to put in writing.</p>
<p>Information that we share with our clients</p>	<p>We may share information about you with our clients, including details of the pre-employment checks we have carried out with our clients for the purposes of quality assurance and evidence of our compliance with our contractual obligations to our clients.</p>
<p>Information that we share with our third party suppliers</p>	<p>We use a number of carefully selected third parties to supply us with products and services, such as our HR systems and IT services.</p> <p>The information that we share with our suppliers will depend on the nature of the products and services that they provide to us but we will only share the minimum amount of your information which is necessary for them to provide us with the products and services we need.</p> <p>This may sometimes involve your information being shared or stored outside of the UK and outside the European Economic Area. For more details about how we make sure your</p>

	<p>information is protected if it is shared or stored outside the UK and the European Economic Area, please see the section Where is your information stored? below.</p>
<p>Information that we share with other third parties</p>	<p>If we or any member of the Lowell group of companies merges, transfers or sells part or all of its business or assets or any of the share capital of Lowell Portfolio I Ltd or Lowell Financial Ltd to a third party, your personal information may be disclosed to that third party and its advisers for the purposes of negotiating and completing the merger, transfer or sale. If the merger, transfer or sale does complete, that third party may use or disclose your information as set out in this privacy notice.</p> <p>We may also share your information with our investors, insurers, lenders, legal and other professional advisers where necessary.</p>

- [Where is your information stored?](#)

Your information is gey stored on servers and filing systems in the UK or the European Economic Area (EEA) but from time to time it may be stored in or accessed from countries outside the UK and EEA. Where this may happen, we always make sure that there are appropriate safeguards in place, such as the standard contractual clauses or binding corporate rules, to guarantee that your information – and your rights – are protected to the same high standard as under UK law.

<p>Standard contractual clauses</p>	<p>These are a set of standard clauses which have been recognised by the European Commission and the Information Commissioner’s Office as providing adequate protection to personal information transferred outside the UK and EEA.</p> <p>When we include these clauses in a contract with one of the companies we work with, it means that if they transfer your information outside the EEA, they must make sure that your information is just as safe as it is in the EEA.</p>
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Binding corporate rules

These are a way for large groups of companies which are based in lots of countries around the world to transfer personal information to companies in their group in a way that complies with the UK data protection laws. The binding corporate rules must be approved by the data protection regulator before the group of companies can adopt them.

When one of the companies we work with uses binding corporate rules, it means that if they transfer your information outside the UK, they have procedures in place to make sure that your information is handled in a way that makes sure that your information is just as safe as it is in the UK and EEA.

To view a copy of the standard contractual clauses please visit **Standard Contractual Clauses (SCC) | European Commission (europa.eu)** or **Standard Contractual Clauses (SCCs) after the transition period ends | ICO**. For binding corporate rules, please contact the Data Protection Officer using the contact details provided above.

- [**How long do we keep your information?**](#)

We only keep your information for as long as we need it.

If your application is successful and you become a Lowell colleague, the information we collect about you during the talent acquisition process will become part of your employee file. Please see our colleague privacy notice for details about how we process your data as an employee.

If your application is not successful this time, we may put you in our talent pool for up to 12 months following the end of the talent acquisition process for the role you are applying for, so that we can contact you about future opportunities with us. If you do not want to be contacted about other roles at Lowell, please let us know.

If your application is unsuccessful and we do not place you in our talent pool this time, we will keep your information for no more than 6 months from the end of the talent acquisition process so that we can deal with any issues or concerns that you may have about how we handled your application or to allow us to bring or defend legal proceedings.

We have a retention policy which we have written by considering all the different types of information that we hold about you, understanding how long we need to keep it for and agreeing not to keep it for any longer.

We may sometimes anonymise your information so that we can use the information for our legitimate business purposes such as reviewing and understanding how our talent acquisition

processes work so that we can improve them. If we do this, we will remove any information that can be used to identify you.

- **Do we carry out profiling and automated decision-making?**

We don't carry out any profiling of people who apply to work with the UK Lowell group of companies.

Using the information that you provide to us by completing the application form, we use automated decision-making processes to decide whether or not to take your application through to the next stage of the talent acquisition process.

Our automated decision-making processes only use the answers that you have provided to certain questions in our application process to decide whether you meet our minimum requirements for a role with Lowell.

Using our systems in this way helps us to make sure that our decisions are quick, fair, efficient and accurate based on the information that you have provided to us. We make decisions in this way on the basis that it is necessary for us to take these steps at your request prior to entering into an employment contract with you, which means that we need to do this in order for us to assess your application and decide whether you are suitable for the role you are applying for at Lowell.

If we decide not to proceed with your application, you will not be offered a role with the UK Lowell group of companies.

You have the right to ask us to review any automated decisions we have made about you.

If you would like to exercise any of your rights, please contact our Data Protection Officer by:

- by email at dpo@lowellgroup.co.uk or
- by writing to Data Protection Officer, Lowell Financial Ltd, PO Box 13079, Harlow, CM20 9TE.

Our Data Protection Officer deals with data protection for all our UK companies, so whichever Lowell company your question, query or request relates to, please contact our Data Protection Officer using these contact details.

- **What rights do you have?**

Under the data protection laws, you have a number of rights in respect of your information and the way we use it. Some of these rights only apply in certain situations. We explain below what rights you have, what these mean and how they apply to the way we use your information.

You have the right to	What does this mean?	How does this apply to the way we use your information?
Access your information	You can ask for:	We will provide you with a copy of your personal information which we hold unless the data protection laws provide an exception that we decide to rely on, for example where there are ongoing court

	<ul style="list-style-type: none"> • confirmation that we process your personal information • a copy of your personal information that we hold and • other information about how we process your information. 	<p>proceedings. We may also edit out the names of any other individuals to protect their privacy.</p> <p>Wherever possible, we will provide you with a copy of your personal information in the same manner you make your request unless we agree otherwise with you.</p> <p>This privacy notice also includes the other information you can ask for about how we process your information.</p>
<p>Have your information rectified</p>	<p>You can ask us to rectify your information if it is not accurate, complete or up to date.</p>	<p>We will update or correct your information, although sometimes we may need to ask you to provide evidence to confirm the changes, for example a copy of your marriage certificate if you are changing your name because you have got married.</p>

<p>Have your information erased</p>	<p>This is also known as the right to be forgotten.</p> <p>You can ask us to delete your information where:</p> <ul style="list-style-type: none"> • we no longer need it • we rely on your consent to use your information and you withdraw it • you object to our processing it and we have no overriding legitimate grounds to continue processing it or • we are legally required to delete it. <p>This right does not apply where:</p> <ul style="list-style-type: none"> • we are legally required to keep your information, for example under the laws which 	<p>As we rely on the fact that we need your information to (a) take steps at your request prior to entering into an employment contract with you (b) comply with our legal obligations or (c) protect you where it is a matter of life and death for most processing of your personal information, we will only be able to delete your personal information:</p> <ul style="list-style-type: none"> • if you have the right to object to our processing your personal information and to carry out your request we have to erase your information and • where we no longer need your information. Although our retention policy means that we will delete your information once we no longer need it. Please see the section How long do we keep your information? above for more details.
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	<p>require us to check you have a right to work in the UK</p> <ul style="list-style-type: none"> • we have a compelling legitimate ground for using your personal information or • we need your information to establish, exercise or defend legal claims, for example where there are ongoing court proceedings. 	
<p>Restrict our processing of your information</p>	<p>You may ask us to restrict our processing of your personal information where:</p> <ul style="list-style-type: none"> • you believe the information we hold about you is inaccurate while we check whether it is accurate 	<p>We will not process your personal information whilst we consider your request. However, we will still be able to process your personal information for the purposes of any ongoing court or other legal proceedings.</p> <p>We will inform you if we begin processing your personal information again and explain why.</p>

	<ul style="list-style-type: none"> • we no longer need your information but you need it to establish, exercise or defend a legal claim or • you object to our processing your personal information while we reconsider our legitimate interests assessment. 	
<p>Have your information transferred to you and/or a third party</p>	<p>This is also known as the right to data portability.</p> <p>You can ask us to provide you with a copy of the information which you have provided to us and which we hold electronically.</p>	<p>This right only applies to the information which you have provided to us which we hold electronically. It does not apply to information that we collect to comply with our legal obligations such as evidence of your right to work in the UK.</p> <p>We will provide this information to you in a commonly-used and machine readable format.</p>
<p>Object to our processing of your information,</p>	<p>You can object to our use of your information, including profiling unless:</p>	<p>We don't carry out any profiling of people who apply to work with the UK Lowell group of companies.</p> <p>This right only applies to the information that we process on the basis that it is in our legitimate interests.</p> <p>We don't use your information for direct marketing</p>

<p>including profiling</p>	<ul style="list-style-type: none"> • we have compelling legitimate grounds for using your information or • we need to use your information to establish, exercise or defend a legal claim, for example where there are ongoing court proceedings. <p>You can also object to us using your information for marketing purposes.</p>	
<p>Not to be subject to an automated decision</p>	<p>You can ask us to review any automated decision which has a legal or significant effect for you. You can provide us with your point of view and any additional information that you think we need and ask for a human to reconsider our decision.</p>	<p>You can ask us to reconsider any automated decision we have made about whether or not to proceed with your application.</p>

We will always do our best to respond to your request within one month of receiving it and any additional information we need to confirm your identity and understand your request.

However, sometimes we may need some more time to deal with your request, particularly if it is complicated. Where this happens, we will write to you within one month and let you know why we need some more time and when we will provide you with our response.

If we are unable to carry out your request, we will send you a response explaining why.

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- **[What if you have a complaint?](#)**

If you have any questions, concerns or complaints about the way any of the UK Lowell Companies process your personal information, our Data Protection Officer will do their very best to help you. You can contact our Data Protection Officer by:

- email at dpo@lowellgroup.co.uk or
- letter at Data Protection Officer, Lowell Financial Ltd, PO Box 13079, Harlow, CM20 9TE.

Our Data Protection Officer deals with data protection for all our UK companies, so whichever Lowell company your question, concern or complaint relates to, please contact our Data Protection Officer using these contact details.

If you are not happy with the way we have handled your complaint or are still concerned about our handing of your personal information, you have a right to take your complaint to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and www.ico.org.uk.

- **[Who are the Lowell group?](#)**

The Lowell group is made up of the following companies incorporated in the UK

Lowell Portfolio I Ltd	Company number 04857418
Lowell Financial Ltd	Company number 04558936

Lowell Solicitors Limited	Company number 08647091
Overdales Legal Limited	Company number 07407310
Lowell UK Shared Services Limited	Company number 08336897
Lowell Group Shared Services Limited	Company number 08647094
Lowell Receivables Financing 1 Limited	Company number 11344999
Lowell Receivables Financing 2 Limited	Company number 13403235
Lowell Receivables Financing 3 Limited	Company number 13849615
Lowell Portfolio III Limited	Company number 08096778

Lowell Portfolio IV Limited	Company number 08654105
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- **Changes to this notice**

This privacy notice was updated in October 2022.

We will regularly review this notice and keep it updated to make sure that the information we provide you with is accurate and up to date.

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