

Ropes & Gray International LLP

Reviewed November 2022

## DATA PROTECTION – CANDIDATE PRIVACY NOTICE

### Introduction and Who We Are

This Privacy Notice provides a comprehensive overview of the practices of Ropes & Gray International LLP, Ropes & Gray (Ireland) LLP and each of their affiliates and subsidiaries (collectively, “**Ropes & Gray**”, “**We**”, “**Us**”, or “**Our**”), with respect to the collection, use and disclosure, for recruitment-related purposes, of personal data and special categories of personal data about candidates who apply for jobs with us (collectively, “**Candidates**”, “**You**”, or “**Your**”).

We are legally obliged to protect personal information that we collect and use under the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”), UK General Data Protection Regulation, (the “**UK GDPR**”) and the Data Protection Act 2018, (the “**DPA**”) and a number of other data privacy laws and regulations. We are the data controllers in respect of any such personal information and are located at:

- **London office:** 60 Ludgate Hill, London EC4M 7AW, with telephone number 020 3201 1500
- **Ireland office:** Glandore, 16 Fitzwilliam Place, Dublin 2, D02 FF82

and email address [privacy@ropesgray.com](mailto:privacy@ropesgray.com).

### Our Collection and Use of Recruitment-Related Personal Data

#### ***What Data Do We Collect?***

The types of data we collect (directly from you or from public or third party information sources such as recruitment agencies) depend on the nature of the position or role you are applying for within Ropes & Gray and the requirements of applicable laws. Such information may include:

- contact information (e.g., name, telephone numbers and e-mail addresses);
- personal details (e.g., date of birth, preferred language and immigration status);
- education and training (e.g., education level, field and institution, competency assessments, professional licenses and certifications); and
- employment history, deal sheet and pro bono activity.

We also store a soft copy of your curriculum vitae, (“**CV**”) on our database so any information included on your CV, including photos, details of hobbies, and other information, will be held on our systems.

The provision of this personal data is a requirement which is necessary in order to consider and process your application and, ultimately, to enter into an employment contract with you if your application is successful. You are not obliged to provide this personal data, however, failure to do so is likely to mean that we are unable to consider and process your application, or enter into an employment contract with you.

#### ***Diversity Data***

Where applicable, your recruitment agency representative should have invited you to complete an online diversity form, at your discretion. This form invites you to submit certain personal details relating to your gender, gender identity, ethnicity, disability status, sexual orientation, religious beliefs, education and

caring responsibilities, only so that we can identify whether there are any trends within responses for particular diverse groups within the application pool.

If you do not wish to provide this information, you are not required to complete the survey. Alternatively, if you do not wish to provide certain of this information in relation to specific survey questions, you may respond “Prefer not to say” in such circumstances. The provision of this personal data is not a statutory or contractual requirement, nor a requirement which is necessary in order to enter into a contract with you. You are not obliged to provide this personal data.

To the extent that we are able to identify you from these responses, such information will constitute both personal data and certain special categories of personal data.

### ***How We Use Your Data and Legal Basis For Processing***

We collect the personal data listed above (apart from the diversity data) for the purposes of:

- considering and evaluating your eligibility and suitability for the job role you have applied for;
- passing your data to key stakeholders within Ropes & Gray who are involved in the recruitment process;
- verifying the information you have provided; and
- entering into an employment contract (and potentially other related agreements) with you if your application is successful.

For all types of candidates, once you have submitted your application, our legal basis for processing your personal data (apart from the diversity data) is that the processing is necessary for the purposes of our legitimate interests (unless such interests are overridden by your interests or fundamental rights or freedoms which require protection of personal data). Our legitimate interests include ensuring that your application is reviewed and fairly considered for the job role applied for and ensuring that we hire people who meet the requirements of the relevant job role.

### ***Diversity Data***

The diversity data collected will be used for the sole purpose of gaining an understanding about the diversity makeup of the applicants who apply to Ropes & Gray International LLP and Ropes & Gray (Ireland) LLP. Such data will not be used for any other purposes.

Once completed, survey responses regarding diversity data will be aggregated and checks will be undertaken to ensure that the aggregated results do not individually identify any survey respondent or otherwise include any personal data. We will use this data to monitor diversity related trends.

Our legal basis for processing your diversity data is the obtaining of your explicit consent to such processing for the specific purposes outlined above. Where we rely on your consent we will make it clear to you at the time of collection of your personal data that we are relying on your consent to process that data for certain specific purposes and you will have the right to withdraw your consent at any time (however, any such withdrawal of consent will not affect the lawfulness of any processing of your relevant data that we carry out based on consent before its withdrawal). If you consent to the use of your diversity data, you may withdraw your consent at any time by contacting us as set out in the **Contact Us** section below.

### ***Data Retention***

We will retain your recruitment data only for as long as is necessary for the purposes set out in this Privacy Notice, subject to your right, under certain circumstances, to have certain sections of your recruitment data erased (see the **What Are Your Rights in Relation to Your Personal Data** section below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights. In

particular, we hold recruitment data about the following categories of person for the corresponding period of time:

Category of person	Retention period
Successful applicants	Your personal data is transferred to a personnel file and is retained for the period of your employment and for six (6) years following termination of your employment for any reason. This includes your diversity data if you completed the online form. You will be provided with an Employee Privacy Notice upon receiving your offer of employment with us which provides further details regarding how we process the personal data of employees.
Unsuccessful applicants	Your personal data will be retained for two (2) years from the end of the consideration window for the job role applied for. This includes your diversity data if you completed the online form.

### ***How We Share and Disclose Your Recruitment-Related Data***

We may share your personal data listed above (apart from the diversity data) with the following third parties for the purposes described below:

**Service Providers:** We share your recruitment data with third-party service providers who perform services on our behalf or for your benefit, such as recruitment agents and software platforms such as Lawcruit.

**Affiliates:** We share your recruitment data with Ropes & Gray LLP, who is our affiliated legal entity, for internal administrative purposes and uses that are consistent with this Privacy Notice.

**Legal Process:** We may disclose your recruitment data to various third parties, such as legal advisers and counterparties in the event that we need to make or defend a legal claim, comply with legal obligations or enforce agreements.

**Business Transfers:** Your recruitment data may be disclosed to various third parties, such as prospective or actual buyers of our business or assets, legal advisers and financial advisers, as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction.

### ***Diversity Data***

In relation to the diversity data, all responses will be kept securely and only authorised members of Ropes & Gray's London HR Team will have access to such responses. Individual survey responses will not be disclosed to or shared with anyone else.

The aggregated, quantified and anonymized diversity data, will be shared with the relevant Ropes & Gray personnel (including, without limitation, personnel of Ropes & Gray LLP) for the purpose of monitoring trends within the data at each stage of the recruitment process. Only non-personally identifiable diversity data will be shared in this way.

### ***International Data Transfers***

Any information that you provide to us is stored in the United States and processed by Ropes & Gray LLP as set out in this Privacy Notice. In order to ensure the protection of your data Ropes & Gray International LLP has entered into European Commission and UK approved Standard Contractual Clauses with Ropes & Gray

LLP. You can request a copy of these Standard Contractual Clauses by contacting us as set out in the **Contact Us** section below.

### ***What Are Your Rights in Relation to Your Personal Data?***

Subject to the conditions prescribed in applicable laws, you have the right:

- to access your personal data;
- to rectify your personal data;
- to request erasure of your personal data;
- to ask us to restrict processing of your personal data;
- to request that your personal data is transferred to a third party; and
- to object, on grounds relating to your particular situation, to processing of your personal data which is based on our or a third party's legitimate interests, including where we undertake any profiling about you based on such legitimate interests.

Where relevant, you can exercise any of these rights by contacting us as set out in the **Contact Us** section below.

### **Complaints**

You also have the right to lodge a complaint with your local supervisory authority.

- In the UK, this is the Information Commissioner's Office ("**ICO**");

- In Ireland, this is the Irish Data Protection Commission ("**IDPC**")

about our use of your personal data or if you consider that the processing of your personal data infringes the GDPR.

Contact details for the ICO are:

#### **Information Commissioner's Office**

Website: <https://ico.org.uk/concerns/> (live chat is available to report concerns)

Telephone: 0303 123 1113

Contact details for the IDPC are:

#### **Irish Data Protection Commission**

Website: <https://www.dataprotection.ie/en/individuals/exercising-your-rights/raising-concern-commission>  
(online form)

### **Contact Us**

If you have any queries, questions, concerns or complaints about this Privacy Notice or our personal data handling practices, please contact us at [privacy@ropesgray.com](mailto:privacy@ropesgray.com)