

## **Recruitment Privacy Policy**

At David Lloyd Clubs we collect, process and hold personal data relating to your job application with us. We are committed to being transparent about how we collect, use and retain data to meet our data protection obligations.

In most circumstances we will only collect basic personal data about you, which does not include any special categories of personal data about you (known as “sensitive personal data”). This data may however include name, email and/or other contact details.

Specific details about what personal data we collect, how and why we collect personal data about you, what we do with the personal data about you, specific retention periods and the consents that we require from you are contained in this policy.

### **What information do we collect?**

All the personal data we collect is received and processed by our employees, agents, advisors, suppliers, contractors and/or partners. David Lloyd Clubs will not trade, sell or share your personal identifiable data for use by any third parties unless we have been authorised by you or are required by law to do so.

Please be aware however that your data may be stored on a cloud based system or on servers based outside the UK but within the EU.

We collect and process a range of information about you, solely for the purposes of the recruitment process and reporting. This includes:

- your name, address and contact details, including email address and telephone number,
- details of your qualifications, skills, experience and employment history, including any start and end dates you choose to share with us;
- Voluntary disclosure information for reporting purposes only.

### **How long we keep information**

We keep your personal data for no longer than reasonably necessary for the purposes for which it is provided. We will only keep personal data for longer if authorised by you or if we are required to do so by law. Specifically your personal data gathered in the process of applying for a role will be kept as below:

- 6 months from the point of decision regarding your application for a role.
- Within a 6 month period you will be contacted to confirm whether you consent for David Lloyd Clubs to keep your information solely for the purposes of the recruitment process and reporting. If you choose to remove your data from our system your data will be purged (removal of personal data such as your name, address and contact details, including email address and telephone number)
- After 6 months from decision regarding your application, data is then purged Please note: Should you wish to apply for another position or are in the process of application during this

initial 6 months period, this period will recommence from the date of the second application and your data will be kept for another 6 months in line with this policy.

- If you are successful as a job applicant, we will retain your name, address and contact details, including email address and telephone number for the purposes of contracting and employing you into the business. Once employed, the privacy statement to outline how we handle your data is included in the Team Member Data Policy.

### **Who has access to my data?**

Your information may be shared internally, including with members of the HR team, club management teams, administrators or other managers within the business, only in relation to the recruitment activity of the business. This only applies to those who have had the relevant training and understand their responsibilities in line with the legislation.

Your data will only be held within the recruitment system Workday and at times as specified above.

### **Securing your information**

We take the security of your personal data very seriously and have in place appropriate security measures. We protect the confidentiality, integrity and availability of personal data by implementing the following key practices:

- We protect our IT systems (i.e. network, systems, data, and websites) from unauthorised access and threats such as malware and denial of service attacks.
- We integrate data minimisation techniques in the collection and sharing of personal data. As a result, we only collect personal data that we need and share the bare minimum of personal data required to deliver a service.
- Personal data will be destroyed when it is no longer needed.
- Apply methods to ensure personal data is accessed and processed by authorised users and systems.
- Provide data privacy, security and awareness training to employees to support secure handling practices.
- Supplier GDPR and security compliance strategies are implemented to ensure those we may share personal data with hold the same values as ourselves.

### **Your rights**

If you wish to see, correct, update, transfer or delete any of the personal data that we hold about you, please contact, in the first instance, the hiring manager or General Manager of the relevant Club to which you have applied.

If you wish to raise a complaint on how we have handled your personal data or you have a general query related to data privacy, you can contact our Privacy Team at [privacy@davidlloyd.co.uk](mailto:privacy@davidlloyd.co.uk) or by writing to David Lloyd Clubs, The Hangar, Mosquito Way, Hatfield, Hertfordshire, AL10 9AX who will arrange for the investigation of the matter. We recommend that correspondence is sent recorded delivery and/or with proof of postage.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

ICO Helpline: 0303 12311.

### **Notification of data breaches**

If you discover a data privacy breach or a breach is notified to you please write to the Privacy Team at the address above. The letter should contain your contact information and key details of the breach.

### **Notification of changes**

**We may occasionally modify our privacy policies, notices and statement. When this happens, we will provide details as to the changes on this web page or via the links on this web page, at the point of data collection or by contacting you directly. We will not significantly change how we use information you have already given to us without your prior agreement.**

### **Links with other websites**

This Privacy Statement is in relation to David Lloyd Clubs only. We are not responsible for the data policies or procedures or content of any linked websites. We recommend that you check the privacy statement of each website you visit.

March 2025