

GDPR Privacy Notice - Trainee Applications

McCann FitzGerald, as a law firm with its principal place of business at Riverside One, Sir John Rogerson's Quay, Dublin 2, Ireland, including its affiliates¹, takes its responsibilities under applicable data protection law, including the General Data Protection Regulation (EU) 2016/679 and implementing legislation ("**Data Protection Law**") very seriously. The purpose of this notice is to inform you of the data relating to you that we may collect and use and the uses (including disclosures to third parties) we may make of your personal data in relation to your application for a trainee position at McCann FitzGerald. McCann FitzGerald is the controller in respect of your personal data and we take all reasonable steps to ensure the safety and privacy of all information.

1. **What information do we collect**

We will collect and process personal data relating to you in connection with your application, including but not limited to:

- 1.1 Personal contact details;
- 1.2 Education;
- 1.3 Employment history;
- 1.4 Appraisals /references; and
- 1.5 Proof of eligibility to work in Ireland.

2. **Purpose of processing and legal bases**

- 2.1 We will use personal data relating to you for the purposes of determining whether you are suitable for and meet all relevant requirements for fulfilling a trainee position with us, fit into our firm culture, and for purposes of internal control.
- 2.2 The legal bases for these processing activities are that the processing is necessary (a) in order to take steps, at your request, prior to entering into a contract in relation to a trainee position with you; (b) for compliance with a legal obligation; or (c) for the purposes of our legitimate interests, e.g. conducting our business in a responsible and commercially prudent manner. We will only process your personal data for the purposes of our legitimate interests where we are of the view that to do so would not constitute an unwarranted interference with your own interests or fundamental rights and freedoms.

3. **Sharing your data**

In the context of the application procedure, your personal data may be shared with third parties, such as insurance and medical providers but only for the purposes as set out above.

4. **Retention and deletion**

The personal data of an applicant for a trainee position that is not employed by us will be retained for 12 months after the end of the application process. The personal data of successful applicants will be retained for a longer period for the purpose of your employment relationship with us. If we receive

¹ McCann FitzGerald includes its affiliates MCF Legal Technology Solutions Limited, MCF Digital Services Limited, HMP Secretarial Limited, McCann FitzGerald Listing Services Limited and Compuserv Limited.

notification from you that you are not taking up a position with us, your personal data will typically be deleted shortly after you notify us. For more information please email dataprotection@mccannfitzgerald.com.

5. Security measures to keep your personal data safe

We employ appropriate technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised persons. We carry out risk assessments on all third party service providers to make sure the personal data they hold is secure. We regularly review our security policies and procedures to ensure our systems are secure and protected.

6. Transfers abroad

Where relevant and necessary for the firm's business, we may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include entering into a contract governing the transfer which contains the 'standard contractual clauses' approved for this purpose by the European Commission or, in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework. If you require further details, please email dataprotection@mccannfitzgerald.com.

7. Your rights and how to update your information

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- 7.1 the right to be provided with a copy of your personal data;
- 7.2 the right to request the rectification and/or erasure of your personal data;
- 7.3 the right to restrict the use of your personal data;
- 7.4 the right to object to the processing of your personal data, where we are processing it based on this being necessary for the purposes of our, or of a third party's, legitimate interests; and
- 7.5 the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller, where we are processing the data based on your consent or that this is necessary for the performance of a contract with you.

In order to exercise any of the rights set out above, you can email us at dataprotection@mccannfitzgerald.com.

8. Complaints

We take a high level of care in how your personal data is handled to ensure that it is safeguarded and our obligations are met. If you are not happy with the way we have used your information or addressed your rights, you may email dataprotection@mccannfitzgerald.com to discuss your concerns. You also have the right to make a complaint to the Irish Data Protection Commission by emailing info@dataprotection.ie.

