

# THE TOO EARLY CO.

## Candidate Privacy Notice

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<b>Version</b>	1.0
<b>Effective date</b>	March 2026
<b>Last reviewed</b>	March 2026
<b>Applies to</b>	All applicants to Too Early Co.

## 1. Who we are

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The Too Early Co. is a student internship platform that places ambitious students in high-growth startups and scale-ups. We are based in the United Kingdom.

We are the data controller for the personal data we collect from you during the application and recruitment process. This means we determine how and why your data is processed.

You can contact us about any data protection matter at:

<b>Email</b>	contact@tooeearly.co.uk
<b>Phone</b>	07902 656049

## 2. What personal data we collect

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When you apply for an internship position, we collect and process the following categories of personal data:

### 2.1 Information you provide directly

- Full name and contact details (email address)
- University or educational institution currently attended or previously attended
- Degree subject and year of study
- CV & supporting documents
- Skills, interests, and motivations as described in your application
- Any other information you voluntarily include in your application

### 2.2 Information generated during the process

- Notes and assessments made by our team during application review
- Correspondence between yourself and our team (emails, messages)
- Records of decisions made about your application

We do not knowingly request or require sensitive personal data (also called ‘special category’ data) such as ethnicity, health information, religion, or political opinions as part of our application process. If you voluntarily include such information in your CV or application, we will treat it with additional care and process it only to the extent necessary.

### 3. Why we process your data and our legal basis

Under UK GDPR, we must have a lawful basis for processing your personal data. The table below sets out what we do with your data and why.

Purpose	Data used	Lawful basis
Reviewing and assessing your application for an internship placement	CV, cover letter, university, location, work experience, skills	Legitimate interests: we have a genuine interest in identifying suitable candidates
Communicating with you about your application status and next steps	Name, email address, phone number	Legitimate interests: necessary to progress your application
Conducting interviews and recording assessments (when this becomes necessary)	Interview responses, evaluator notes, correspondence	Legitimate interests: necessary to make a fair and informed placement decision
Matching you with a suitable business	Full application data and assessment notes	Legitimate interests: core to the service we provide
Complying with legal obligations	As required by applicable law	Legal obligation
Retaining your details for future opportunities (talent pool)	Name, contact details, application summary	Consent: we will ask you separately before adding you to our talent pool

### 4. How long we keep your data

We do not keep your personal data for longer than necessary. Our standard retention periods are as follows:

<b>Unsuccessful applicants</b>	We will delete your application data within 6 months of informing you of the outcome, unless you have consented to being added to our talent pool.
<b>Talent pool</b>	If you consent to being retained for future opportunities, we will hold your data for up to 12 months. We will contact you at least once during this period to confirm you still wish to remain on our list.
<b>Successful candidates</b>	Once you begin a placement, your data is retained for the duration of the internship and for a reasonable period afterwards (typically 12 months) in case of any follow-up queries or references.

**Correspondence**

Emails and messages are retained in line with the above periods and then deleted.

At the end of any retention period, your data will be securely deleted or anonymised so that it can no longer identify you.

## 5. Who we share your data with

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We do not sell, rent, or trade your personal data. We share it only in the following limited circumstances:

- The businesses: once shortlisted or selected for a placement, your application details will be shared with the relevant early-stage company you are being matched with. We will inform you before doing so.

We do not currently transfer your personal data outside the United Kingdom. If this changes, we will update this notice and ensure appropriate safeguards are in place.

## 6. Your rights

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Under UK GDPR, you have the following rights in relation to your personal data. You can exercise any of these rights by contacting us at [contact@tooeearly.co.uk](mailto:contact@tooeearly.co.uk).

Right	What it means
<b>Right of access</b>	You can request a copy of the personal data we hold about you. We will respond within 30 days.
<b>Right to rectification</b>	You can ask us to correct any inaccurate or incomplete data we hold about you.
<b>Right to erasure</b>	You can ask us to delete your personal data in certain circumstances, for example if you withdraw your application.
<b>Right to restrict processing</b>	You can ask us to pause how we use your data, for example while you contest its accuracy.
<b>Right to object</b>	You can object to us processing your data on the basis of legitimate interests. We will stop unless we can demonstrate compelling legitimate grounds.
<b>Right to withdraw consent</b>	Where we rely on your consent (e.g. for the talent pool), you can withdraw it at any time. Withdrawing consent does not affect the lawfulness of processing before withdrawal.
<b>Right to complain</b>	You have the right to lodge a complaint with the Information Commissioner's Office (ICO)

## 7. How we keep your data secure

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We take the security of your personal data seriously. Measures we take include:

- Limiting access to your application data to those within our team who need it for recruitment purposes
- Using password-protected systems and secure email for storing and transmitting personal data
- Not sharing CVs or application documents via unsecured channels
- Deleting data securely once it is no longer needed

In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours and, where required, notify you directly.

## 8. Automated decision-making

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We do not use automated decision-making or profiling to assess your application. All decisions about your application are made by members of our team.

## 9. Changes to this notice

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We may update this privacy notice from time to time to reflect changes in our practices or legal requirements. When we do, we will update the 'last reviewed' date at the top of this document and, where the changes are significant, we will notify applicants by email.

We encourage you to review this notice periodically. The current version is always available at [tooeary.co.uk](https://tooeary.co.uk).

## 10. Contact us

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If you have any questions about this privacy notice, or wish to exercise any of your rights, please contact us:

<b>Email</b>	<a href="mailto:contact@tooeary.co.uk">contact@tooeary.co.uk</a>
<b>Phone</b>	07902 656049

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*This document constitutes the candidate privacy notice of The Too Early Co. and is effective from April 2026.*