

This Privacy Notice sets out the basis on which the Company collects and process any personal data relating to its prospective employees. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

**Data Protection Officer:** Our Senior Legal Advisor will assume the responsibilities of the Data Protection Officer. All correspondence should be addressed to [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com)

**Scope:** This Privacy Notice applies to Sparrows Offshore Group Limited (“Sparrows Group”), (“The Company”) and all subsidiary companies.

## 1 WHAT INFORMATION DOES THE COMPANY COLLECT ABOUT ME?

In connection with your application to work with us, The Company will collect, store and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and any covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview
- The information you have provided on our Personal Details Form.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

## 2 HOW DOES THE COMPANY COLLECT MY PERSONAL DATA?

We may collect personal information about candidates from the following sources:

- You, the candidate.
- A recruitment agency.
- A background check provider.
- Your named referees.

## 3 HOW WILL THE COMPANY USE INFORMATION ABOUT ME?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role you have applied for.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Maintain and promote equality in the workplace.
- Comply with legal or regulatory requirement such as entitlement to work in the country of employment

## **4 WHY DOES THE COMPANY PROCESS PERSONAL DATA?**

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your application for the role, including any CV or covering letter and (if applicable) the results from any test that you may have taken in relation to your application, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and carry out a pre-employment medical assessment before confirming your appointment.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes). We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.

Where The Company processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data The Company uses for these purposes is anonymised or is collected with the express consent of employees and can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

## **5 WHAT IF I DO NOT PROVIDE PERSONAL DATA?**

Certain information, such as contact details, your right to work in the relevant location and payment details must be provided to enable The Company to enter a contract of employment with you, should you be successful in your application.

If you do not provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further

## **6 WHO HAS ACCESS TO DATA?**

Your information may be shared internally, including with members of the HR, Recruitment, Logistics, Competence & Training and the hiring manager, if access to the data is necessary for performance of their roles.

The Company shares your data with third parties in order to obtain pre-employment references from other employers.

Your data may be transferred to countries outside the European Economic Area (EEA) for the purposes of the recruitment process. Data is transferred outside the EEA on the basis of relevant safeguards e.g. declaration of adequacy, binding corporate rules or other safeguards.

## 7 HOW DOES THE COMPANY PROTECT DATA?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where The Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## 8 FOR HOW LONG DOES THE COMPANY KEEP DATA?

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## 9 YOUR RIGHTS

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require The Company to change incorrect or incomplete data;
- Require The Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where The Company is relying on its legitimate interests as the legal ground for processing; and
- Ask The Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override The Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Protection Officer. All correspondence should be addressed to [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com)

If you believe that The Company has not complied with your data protection rights, you can complain to the Information Commissioner.

## 10 AUTOMATED DECISION-MAKING

Employment decisions are not based solely on automated decision-making.

### **11 RIGHT TO WITHDRAW CONSENT**

In applying for this role, you provide consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Data Protection Officer at [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### **12 CHANGES TO PRIVACY NOTICE**

We keep our Privacy Notice under regular review and, as such, it may change from time to time. This Privacy Notice was last updated on 30 November 2018.