Global Procurement Group

Candidate Privacy Policy

INTRODUCTION

Welcome to the Global Procurement Group Candidate Privacy Policy (the 'Privacy Policy').

In this Privacy Policy, when we refer to:

- 'we', 'us', 'our', or 'Global Procurement Group', we are referring to:
    - NGP Utilities Limited;
    - Energies France Limited;
    - ClearVUE.Business Limited;
    - NGP EMS Limited; and
    - Clearvue Data Analysis & Carbon Control Systems LLC
- 'you' and 'your', we mean any individual who:
    - applies for a job with Global Procurement Group; or
    - uses our website, https://ngpcareers.com (the 'Website'); and
- 'personal information', we mean any information that can be used to identify you as an individual (whether alone, or if combined with other information).

We respect your privacy and are committed to protecting your personal information. In this Privacy Policy, we explain how and why we collect, process, use and disclose your personal information, and what rights you have in relation to our use of it.

In certain circumstances, you may have a right to object to our use of your personal information. For further information regarding this, please refer to the Your Rights section below.

Please read this Privacy Policy carefully as it contains important information to help you understand how we use your personal information. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

From time to time, we may change this Privacy Policy. As a result, please refer to this Privacy Policy regularly to review any amendments.

WHO ARE WE?

This Privacy Policy covers the processing of personal information carried out by the companies that make up the Global Procurement Group (as listed above).

For job applicants, the controller of your personal information will be the specific Global Procurement Group company that you are applying for a job with. This is the entity that is responsible for determining how your personal information is processed and for what purposes.

Where you are using our Website, the controller of your personal information will be NGP Utilities Limited.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

We may collect and process personal information about you in connection with your application for a job with us, or through your use of our Website.

This can include a range of personal information, including:

- **Identity Data**: name, title;
- **Personal Contact Details:** postal address, email address, telephone number;
- **Work Contact Details:** work email address, fax number, telephone number;
- **Gender**;
- **CV information:** education history, work history, qualifications, interests and hobbies, date of birth and any other information you may provide us on your CV and/or cover letter;

- **Referees:** details of any references;
- **Right to Work**: right to work information including passport, driver's licence, work visa;
- **Financial Details**: national insurance number, bank account details, payroll records and tax status information (this information is collected during the employee onboarding process, once an offer of employment has been made and accepted, rather than during the recruitment or application process itself);
- **Technical Data**: includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Website;
- **Photographs and Video Recordings**: when you visit one of our premises, for example when attending an interview, we may record CCTV footage of you. We may also record interviews conducted via Microsoft Teams (or a similar video conferencing platform); where we do so, you will be informed of this in advance and referred to this Privacy Policy for further information on how any such recording, and the personal information captured in it, is handled;
- **Call recordings**: when you speak to us on the phone, we may record our call which will capture your voice;
- **Communication Preferences**: details of your preferences to receiving updates from us (such as updates on vacancies) and your preferences on methods of communication;
- **Complaints and Enquiries**: details of any complaints or enquiries that you may make to us; and
- **General Information**: including other personal information you may provide during communications with us (for example, if you provide us with personal information when we are conducting an interview with you over the phone).

We may also collect and use more sensitive personal information about you, including:

- Information about your health, including any disability information you disclose to us;
- Information about your race or ethnicity, religious beliefs;
- Information regarding trade union memberships, sexual orientation and political opinions (UK and Malta only); and
- Information about criminal convictions and offences.

Where we need to collect personal information by law, or under the terms of a contract we have with you or are trying to enter into with you (such as an employment contract), and you fail to provide that personal information when requested, we may not be able to perform or offer that contract of employment. We will notify you if this is the case at the time.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We use different methods to collect personal information from and about you, including:

- **From you directly**. For example, you may provide us with your contact details and CV information when submitting a job application, or when signing up to receive vacancy alerts. You may provide further information to us during interview or via any exams or tests you may need to undertake.
- **Through third parties**. For example, we may receive your personal information from third party recruitment agencies or platforms (such as Indeed), from your referees (typically by way of email correspondence rather than through our Website), or from background check agencies. We may also receive your details from GPG employees through our referral scheme.
- **Through publicly available sources**. For example, we may identify further details about you through publicly available sources (such as LinkedIn).
- **Through automated technologies**. Where you interact with our Website, we may automatically collect certain Technical Data about your equipment, browsing actions and patterns. We collect this information by setting cookies and other tracking technologies on our Website. Please see the Cookies section below for further information.

PERSONAL INFORMATION ABOUT THIRD PARTIES

In the course of the job application process, you may provide us with the personal information of third parties. For example, you may provide us with the information of a referee. In such cases, we will process such third party personal information in accordance with this Privacy Policy.

Where providing us with third party personal information, you confirm that the third party is happy for you to share their personal information with us, and that you have made them aware of this Privacy Policy.

USE OF YOUR PERSONAL INFORMATION

We collect and process your personal information for a number of different reasons. Under data protection laws, we require a legal basis in order to process your personal information for each of our processing purposes. Most commonly, the legal bases we rely upon are:

All Jurisdictions:

- where we have your **consent**;
- where the processing is **necessary in order to enter into a contract with you or to perform a contract that we have in place with you**; or
- where the processing is **necessary in order to protect your vital interests**;
- where the processing is **necessary in order to comply with a legal obligation**;

UK and Malta:

- where the processing is **necessary for us to pursue a legitimate interest**, and our legitimate interests are not overridden by your interests or rights; or

UAE:

- where the processing is necessary in order to comply with legally established rights and obligations in respect of the **field of employment** (for example, registering eligible employees with the federal pension scheme)
- where the processing is necessary to initiate any procedures of **legal claim or defense of rights or is related to judicial or security procedures**.

We have set out in the table below the main purposes for which we process your personal information, along with the legal bases we rely upon for such processing. For the UK and Malta, where we rely on our legitimate interests as our legal basis, we also set out what our legitimate interest is. Some legal bases apply only for select jurisdictions, as identified below.

Purpose	Jurisdiction	Legal Basis
Job Applicants / Candidates		
To make decisions in relation to recruitment or appointment	All	Necessary in order to enter into **a contract with you or to perform a contract that we have in place with you**.
	UK and Malta	Necessary for our **legitimate interests** (as it is within our legitimate interests to decide whether you are a good fit for our business or not).
Communicate with you about the recruitment process	UK and Malta	Necessary for our **legitimate interests** (as it is within our legitimate interests to efficiently communicate with applicants about the recruitment process, including invitations for interview, and letting candidates know the outcome of the recruitment process). This is also in accordance with the candidate's own
	UAE	Necessary in accordance with our **rights in the field of employment**.
To determine the terms on which you will work for us, including your salary, job role, obligations and other benefits	All	Necessary in order to enter into **a contract with you or to perform a contract that we have in place with you**.
	UK and Malta	Necessary for our **legitimate interests** (as it is within our legitimate interests to decide the basis on which we will make an offer of employment or engagement).
Carrying out pre-employment checks, including any relevant right to work checks, and liaising with third party referees	All	Necessary in order to enter into a **contract with you or to perform a contract that we have in place with you**.
	UK and Malta	Where the processing is **necessary in order to comply with a legal obligation**. Necessary for our **legitimate interests** (as it is within our legitimate interests to ensure anyone we make an offer to has a right to work for us).

Purpose	Jurisdiction	Legal Basis
Keeping records relating to our hiring processes	UK and Malta	Necessary for our **legitimate interests** (being our interest to keep accurate records of our recruitment decisions, including for audit purposes and in order to assist in determining future recruitment (such as identifying other possible roles for impressive candidates that aren't successful)).
	UAE	Necessary in accordance with our **rights in the field of employment**.
To fulfil any competitor agreement obligations (for example, we may have contractual obligations to request consent from your existing employer to engage with you, where the existing employer is a competitor of Global Procurement Group)	UK and Malta	Necessary for our **legitimate interests** (being our interest in ensuring we are complying with our contractual obligations and performing our recruitment activity in an effective and compliant manner).
	UAE	Necessary in accordance with our **rights in the field of employment**.
Dealing with legal disputes, claims or complaints involving you	UK and Malta	Where the processing is necessary for our **legitimate interests** (being our interest in ensuring we protect our rights in relation to any complaint, claim or dispute). Where the processing is **necessary in order to comply with a legal obligation**.
	UAE	Necessary in accordance with our **rights in the field of employment.**
To comply with our legal and regulatory obligations (including in connection with any court orders or requests from regulatory authorities), and to establish and defend our legal rights.	UK and Malta	Necessary for compliance with a **legal obligation.** Alternatively, if we are not under a strict legal obligation, we may still have a **legitimate interest** (as we have an interest in cooperating with authorities, complying with laws, regulations, standards and codes of conduct, and in defending our rights).
	UAE	Necessary in accordance with our **rights in the field of employment.**
Equal opportunities monitoring	UK and Malta	Where the processing is necessary for our **legitimate interests** (being our interest in ensuring we are running as an effective business and ensuring that we manage our staff in an appropriate manner).
	UAE	Necessary in accordance with our **rights in the field of employment.**
Website Users		
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	All	Necessary to comply with a **legal obligation.**
	UK and Malta	Necessary for our **legitimate interests** (for running our business and ensuring we have appropriate cyber security).
To deliver relevant content to you on our Website and measure or understand the effectiveness of the content we serve to you.	All	**Consent**
	UK and Malta	Necessary for our **legitimate interests** (to study how you use our Website, so that we can develop it and grow our business).

Purpose	Jurisdiction	Legal Basis
To use data analytics to improve our Website.	All	**Consent**
	UK and Malta	Necessary for our **legitimate interests** (to keep our Website updated and relevant).
To keep you informed of any vacancies that may be of interest to you.	All	**Consent**
	UK and Malta	Necessary for our **legitimate interests** (to effectively advertise vacancies and ensure we are reaching interested parties).
To comply with our legal and regulatory obligations (including in connection with any court orders or requests from regulatory authorities), and to establish and defend our legal rights.	All	Necessary for compliance with a **legal obligation.**
	UK and Malta	Alternatively, if we are not under a strict legal obligation, we may still have a **legitimate interest** (as we have an interest in cooperating with authorities, complying with laws, regulations, standards and codes of conduct, and in defending our rights).
Visitors		
To manage who is entering our premises and to prevent unauthorised access to our premises.	**UK and Malta**	**Legitimate interest** (we have an interest in processing your personal information to ensure that only authorised individuals have access to our premises).
	UAE	Necessary in order to **conclude a contract.**
To detect, investigate and prevent crime and manage commercial risks.	UK and Malta	**Legitimate interest** (we have an interest in processing CCTV footage in our premises in order to prevent and detect any unacceptable activity).
	UAE	Necessary to **initiate procedures of legal claim or defence of rights or is related to judicial or security procedures.**

For the UK and Malta, in relation to the sensitive personal information we process about you, we will rely upon one of the legal bases as listed above, along with an additional legal basis (as required by law). Most commonly, we rely on the following additional legal bases:

- where we need to carry out our legal obligations or exercise rights in connection with your employment (for example, we may process information about your health to make reasonable adjustments for any interviews);
- where the processing is needed in the public interest, such as for equal opportunities monitoring (for example, we may use information about your race or national or ethnic origin, religious beliefs or sexual orientation to ensure meaningful equal opportunity monitoring and reporting); or
- where it is necessary to protect you or another person from harm (for example, if we reasonably believe that you or another person are at risk of harm and the processing is necessary to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being).

We may also process information about **criminal convictions** (for example, through arranging DBS checks where you are based in the UK, or obtaining a police conduct certificate where you are based in Malta or the UAE), if it is appropriate given the nature of the role and where we are legally able to do so. When we process your information in this way, we rely on our legal obligations in connection with your employment as our relevant additional legal basis.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Head of Data Protection on the contact details referred to below.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

HOW WE MIGHT SHARE YOUR PERSONAL INFORMATION

When processing your personal information for the purposes set out above, we may share your personal information with third parties, including:

- our professional advisors, including our solicitors and accountants;
- our competitors, where required due to contractual obligations;
- our third-party service providers who process information on our behalf (including background check agencies, recruitment agencies and job boards such as Indeed);
- other companies within our 'Wider Corporate Group' (being Global Procurement Group Limited and all of its various subsidiaries);
- your nominated referees;
- other third parties who may assist us in order to enforce our rights, or to protect our property and rights; and
- law enforcement bodies, including in order to comply with any legal obligation or court order.

We may also share with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION TO?

We need to transfer personal information across our Wider Corporate Group to help operate our business efficiently, and this may involve transfers outside of the UAE, UK and/or the European Economic Area (EEA). We also may need to transfer your personal information outside of the UAE, UK and/or EEA where we share personal information with third parties.
We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect your personal information, by ensuring that at least one of the following safeguards is in place:

- your personal information is being transferred to a country that has been deemed by the applicable authorities (the UK government, the European Commission or the UAE government, as applicable) to provide an adequate level of protection for personal information; or
- we ensure that we have a data transfer agreement in place with the overseas recipient of your personal information, which incorporates specific clauses that have been approved by the UK government, the European Commission and/or other applicable authorities (as applicable).

For further information, please contact our Head of Data Protection using the contact details below.

RETENTION OF YOUR PERSONAL INFORMATION

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation.
To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

For further information on how long we hold your personal information, please contact our Head of Data Protection, using the contact details below.

COOKIES

Our Website uses cookies and other tracking technologies (which we will generally refer to as "cookies") to distinguish you from other users and help provide you with a tailored experience when you visit our Website. You can find further information about the cookies we set by visiting our Website, where you will also find details of how you can change your settings to block or delete cookies (although please note that this may impact your viewing and use of our Website).

OTHER WEBSITES

Our Website may include links to third party websites. We cannot control the content or the security of any third-party websites. Linking to such websites is done at your own risk and we make no representations as to those third-party websites' content. We cannot be held responsible for any loss or damage incurred by you as a result of using third party websites. No links are intended to be, nor should be construed as, an endorsement of any kind by us of that other website. Third party websites are not governed by our Privacy Policy, and we encourage you to read the privacy policy of every website that you visit.

SECURITY

We place great importance on the security of all personal information that we process. We invest appropriate resources to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure, and we cannot guarantee the security of your personal information sent over the internet or by email. We therefore do not accept responsibility for unauthorised or unintended access that is beyond our control.

YOUR RIGHTS

Under data protection laws, you have certain rights with respect to your personal information. These include:

- **Right of access.** You have the right to receive a copy of the personal information we hold about you, as well as other supplementary information about how we use your personal information. This right is subject to certain exemptions.
- **Right to rectification.** You have the right to ask us to correct your personal information where this is incomplete or inaccurate.
- **Right to erasure.** You have the right to ask for your personal information to be deleted in certain circumstances, including where:
    - the personal information is no longer necessary for the purpose it was collected or processed for;
    - we rely on your consent as our legal basis for processing, and you withdraw your consent;
    - you object to our processing of your personal information (as described below);
    - your personal information has been processed unlawfully; or
    - your personal information has to be erased to comply with a legal obligation.
- **Right to restriction.** You have the right to ask us to suspend our use of your personal information in certain circumstances, including where:
    - you have contested the accuracy of your personal information, and we are in the process of verifying its accuracy;
    - we no longer require your personal information, but you need us to keep this information in order for you to establish, exercise or defend a legal claim;
    - you have objected to our processing (as described below) and we are assessing whether our legitimate grounds override your objection; or
    - your personal information has been processed unlawfully but you have opposed the erasure of the information and requested restriction instead.
- **Right to portability.** You have the right to receive your personal information in a structured, commonly used and machine-readable format, and for this information to be transferred to another organisation where technically feasible. This right of portability applies only where:
    - our legal basis for processing your relevant personal information is either consent or the performance of a contract with you; and
    - we are processing by automated means (i.e. the right does not apply to any paper files).
- **Right to object.** You have a right to object to our processing of your personal information in certain circumstances, including:
    - where we are processing your personal information for direct marketing purposes;
    - for the UAE, where the processing is intended for the purposes of conducting statistical surveys, unless the processing is necessary to serve the public interest; and
    - in the UK and Malta, where we are relying on legitimate interests as our legal basis for processing and you have specific reasons for objecting (in which case, we may override your objection if we have legitimate grounds to do so).
- **Right to withdraw consent.** Where we rely on consent as our legal basis for processing your personal information, you have the right to withdraw your consent at any time.

A number of these rights are subject to exemptions. For further information on your rights and when they apply, or if you wish to exercise any of your rights, please contact our Head of Data Protection using the contact details provided below.

COMPLAINTS PROCESS

If you have a complaint about how we have handled your personal information, you may contact our Head of Data Protection using the details below and we will investigate your complaint. We will acknowledge your complaint within 30 days of receipt, and will provide a full response without undue delay.

In addition to the rights listed above, under data protection law, you also have a right to complain to the relevant data protection authority applicable to you.

If you are based in the UK, the Information Commissioner's Office (**ICO**) will be your relevant data protection authority, if you are based in Malta, the Information and Data Protection Commissioner (**IDPC**) is the relevant data protection authority, and if you are based in the UAE, the UAE **Data Office** is the relevant data protection authority.

CONTACT US

If you have any questions about this Privacy Policy, please contact our Head of Data Protection, David Summerhayes, using the following contact details:

- emails to data.protection@ngp.co.uk; and
- letters to David Summerhayes, Baltic Place East Tower, South Shore Road, Gateshead, United Kingdom, NE8 3AE.

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