	<b>HUMAN RESOURCES</b>	<b>DOC. REF.: HRD-08319</b>
	<b>DATE OF ISSUE: 13/03/2019</b>	<b>DATE OF REVISION: 08/04/2019</b>
	<b>REVISION NO: 02</b>	
	<b>DOCUMENT TITLE: Applicant Privacy Notice</b>	

## **Privacy Notice – Applicants**

### **NOTICE STATEMENT**

As part of any recruitment process, PanGeo Subsea collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. PanGeo Subsea are registered as a Data Protection Officer with the Information Commissioner's Office under registration number ZA508608.

### **THE KIND OF INFORMATION WE COLLECT ABOUT YOU**

PanGeo Subsea collects a range of information about you including:

- Personal contact details such as name, title, addresses, contact details (including email address and telephone number(s))
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including any benefits entitlements
- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK

### **THE WAY WE WILL COLLECT YOUR PERSONAL INFORMATION**

Your information is collected in different ways, for example, data might be contained in CV's, passport or other identity documents or collected through the interviews which are held and any other forms of assessment such as online testing.

PanGeo Subsea will also collect personal data about you from third parties such as references supplied by former employers. PanGeo Subsea will seek information from third parties only once a job offer has been made to you and we will confirm that we are taking up references.

### **WHERE WE WILL KEEP YOUR PERSONAL INFORMATION**


The data we collect will be stored in a range of different places, including on your application record, in HR files and systems and on other IT systems (including email).

### **WHY WE PROCESS YOUR PERSONAL INFORMATION**

PanGeo Subsea needs to process data to take steps at your request prior to entering into a contract with you and again if we do enter into a contract with you.

Sometimes we need to process data to ensure that we are complying with legal obligations, for example, we are required to check an applicant's eligibility to work in the UK prior to any employment starting.

We have a legitimate interest in processing personal data during the recruitment process and keeping records of that process. By processing data from job applicants, we can manage recruitment processes, assess and confirm your suitability for employment and make decisions on job offers. There are times when we may need to process data from job applicants in the response to and defence of any legal claims which may be brought.

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We have assessed and believe that in addition to our interests, it is in your interests for us to retain your personal information in relation to any suitable future employment opportunities which you may be interested in. If you object to us retaining your information you can object by writing to HR.

Where necessary, we also process health information if we need to make reasonable adjustments to the recruitment process in relation to any type of ill health or disability which an applicant may have. This allows us to carry out our obligations and exercise specific rights in relation to employment.

### **WHO HAS ACCESS TO YOUR DATA**

Your information will be shared for the purpose of the recruitment exercise, this includes sharing with members of the recruitment team [including the recruitment team of any third party Company who has the vacancy], interviewers involved in the recruitment process, and IT staff if access to any of the data is necessary for the performance of their roles.

We will not share your data with third parties [unless you are aware that your application is for employment with a third party Company], until your application for employment is successful and you receive an offer of employment. We will then share your data with former employers to obtain references for you.


We may transfer your personal information outside the EEA for resourcing purposes. If we do, PanGeo Subsea requires the same security measures and safeguards to be in place as when data is transferred within the UK and you can expect continued protection of your personal information.

### **DATA SECURITY**

PanGeo Subsea takes the security of your data very seriously and has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees and 3rd party providers in the legitimate performance of their duties in relation to the recruitment process.

If you are unsuccessful in a specific recruitment process and provide consent for us to retain your data for a further period in order to be considered for future employment opportunities, at the end of that period we will delete and destroy your data if we have not successfully obtained further consent from you for a further period of retention. Your data will be deleted and destroyed at any time where consent is required and you exercise your right to withdraw your consent to us retaining your data.

If you are successful in your application for employment, personal data gathered during the recruitment process will be transferred to your personal file and retained in accordance with Company policies. You will be provided a new Employee Privacy Notice at that time.

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## YOUR RIGHTS

As a data subject, you have several rights, you can:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- Ask us to stop processing data for a period of time 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 PanGeo Subsea Scotland Ltd, Custom House, 35 Regent Quay, Aberdeen, AB11 5BE.

You can also contact us to request a Subject Access Request Form (SAR) if you wish to make a SAR.

If you believe that the organisation has not complied with your data protection rights you can complain to the Information Commissioner's Office (ICO).