

Personal Data – Privacy Notice

1. What is the purpose of this document?

- 1.1. Dragon LNG ('**Dragon**') is committed to protecting the privacy and security of your personal information.
- 1.2. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).
- 1.3. It applies to all job applicants ('**Applicants**').
- 1.4. Dragon is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.
- 1.5. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.
- 1.6. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. Data protection principles

- 2.1 We will comply with data protection law. This says that the personal information we hold about you must be:
 - 2.1.1 Used lawfully, fairly and in a transparent way;
 - 2.1.2 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
 - 2.1.3 Relevant to the purposes we have told you about and limited only to those purposes;
 - 2.1.4 Accurate and kept up to date;
 - 2.1.5 Kept only as long as necessary for the purposes we have told you about; and
 - 2.1.6 Kept securely.

3. The kind of information we hold about you

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2 There are "special categories" of more sensitive personal data which require a higher level of protection.
- 3.3 We may collect, store, and use the following categories of personal information about you:
 - 3.3.1 Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
 - 3.3.2 Employment records (including job titles, work history, working hours, training records and professional memberships);

- 3.3.3 Other personal information included in a CV or cover letter or as part of the application process (e.g. date of birth, gender, marital status, dependants, National Insurance number);
- 3.3.4 Recruitment information (including copies of right to work documentation, references, criminal convictions and offences etc.);
- 3.3.5 Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- 3.3.6 Information about your health, including any medical condition, health and sickness records;
- 3.3.7 Photographs.

4. How is your personal information collected?

- 4.1 We typically collect personal information about Applicants through the application and recruitment process, either directly from candidates or sometimes from an employment agency. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies but you will be aware of this if we are doing so.

5. How we will use information about you

- 5.1 We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:
 - 5.1.1 Where we need to comply with a legal obligation;
 - 5.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
 - 5.1.3 We may also use your personal information where we need to protect your interests (or someone else's interests which is likely to be rare).

Situations in which we will use your personal information

- 5.2 Some of the situations in which we will process your personal information are listed below:
 - 5.2.1 To enable Dragon to carry out the relevant due diligence;
 - 5.2.2 Making a decision about your recruitment or appointment;
 - 5.2.3 Checking that you are legally entitled to work in the UK;
 - 5.2.4 Ascertaining your fitness to work;
 - 5.2.5 Equal opportunities monitoring.
- 5.3 Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

- 5.4 If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations.

6. Change of purpose

- 6.1 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 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.
- 6.2 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Data sharing

- 7.1 We may have to share your data with third parties, including third-party service providers and other entities in the group.
- 7.2 We require third parties to respect the security of your data and to treat it in accordance with the law.
- 7.3 We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

8. Data security

- 8.1 We have measures in place to protect the security of your information. Details of these measures are available upon request.
- 8.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 8.3 We have appropriate security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 8.4 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Data retention

How long will you use my information for?

- 9.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements. Details of retention periods for different aspects of your personal information are available upon request. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 9.2 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We shall assess when is necessary to securely destroy your personal information in accordance with our data retention policy OR applicable laws and regulations.

10. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

- 10.1 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 working relationship with us.

Your rights in connection with personal information

- 10.2 Under certain circumstances, by law you have the right to:
- 10.2.1 **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - 10.2.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - 10.2.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - 10.2.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - 10.2.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - 10.2.6 **Request the transfer** of your personal information to another party.
- 10.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR Manager in writing (details provided below).

No fee usually required

- 10.4 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

- 10.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12. Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

13. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Data Protection Officer:

Name: Tanya Lewis (HR Manager)

Address: Dragon LNG
Main Road
Waterston
Milford Haven
Pembrokeshire
SA73 1DR

Tel: 01646 691730

Email: tanya.lewis@dragonlng.com