

		JOB APPLICANT PRIVACY NOTICE	
Reference:	DLNG-HR-PRN-004	Revision:	001
Issue Date:	25/11/22	Review Date:	24/11/24

1. Purpose

- 1.1. Dragon LNG ('Dragon', the 'Organisation') is committed to protecting the privacy and security of your personal information. 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 Regulations (GDPR).
- 1.2. As part of any recruitment process, the organisation collects and processes personal data relating to job applicants. This privacy notice describes how we collect and use personal information about you during this process us, in accordance with the General Data Protection Regulation (GDPR).
- 1.3. It applies to all job applicants ('Applicants').
- 1.4. 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.
- 1.5. 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.
 - 2.1.6 Stored securely.

3. Information Collected by Dragon LNG

- 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). There are "special categories" of more sensitive personal data which require a higher level of protection.
- 3.2 We may collect, store, and use the following categories of personal information about you:
 - Your name, address and contact details, including email address and telephone number.
 - Details of your qualifications, skills, experience and employment history.
 - Information about your current level of remuneration, including benefit entitlements.
 - Whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.
 - Information about your entitlement to work in the UK.
 - Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

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- 3.3 The organisation collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.
- 3.4 The organisation will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

4. How Your Information is Stored

- 4.1 Data is stored in several different places including HR electronic records, in the organisation's HR Management Systems, and in other IT systems (including the organisation's email system).

5. Why Your Data is Processed

- 5.1 The organisation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.
- 5.2 In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.
- 5.3 The organisation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.
- 5.4 Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not.
- 5.5 The organisation processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.
- 5.6 Where the organisation processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes as permitted by the Data Protection Act 2018/reasons of substantial public interest.
- 5.7 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:
- 5.7.1 Where we need to comply with a legal obligation.
- 5.7.2 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.
- 5.7.3 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).
- 5.8 For security reasons, the organisation seeks information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment to

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establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct/the purposes of preventing or detecting unlawful acts.

- 5.9 The organisation will not use your data for any purpose other than the recruitment exercise for which you have applied.

6. Access to Your Data

- 6.10 Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.
- 6.11 The organisation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.
- 6.12 The organisation will not transfer your data outside the UK.

7. Data Sharing

- 7.1 Dragon LNG 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. Protecting Your Data

- 8.1 Dragon LNG takes the security of your data seriously. The organisation 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. See Dragon LNG Data Protection Policy for further details.
- 8.2 Where the organisation 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.

9. Data Security

- 9.1 We have measures in place to protect the security of your information. Details of these measures are available upon request.
- 9.2 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.
- 9.3 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.

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10. Change of Purpose


- 10.1 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.
- 10.2 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.

11. Data Retention

- 11.1 If your application for employment is unsuccessful, the organisation will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, the organisation will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.
- 11.2 If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

12. Your rights

- 12.1 As a data subject, you have a number of 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, for example where the data is no longer necessary for the purposes of processing.
 - Object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.
 - Ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the organisation's legitimate grounds for processing data.
- 12.2 If you would like to exercise any of these rights, please contact the HR Manager, contact details are noted below.
- 12.3 You can make a subject access request in writing to the HR Manager, contact details are noted below.
- 12.4 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.
- 12.5 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.
- 12.6 If you believe that the organisation has not complied with your data protection rights, you can complain to the **Information Commissioner**.

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13. Providing Your Personal Data

13.1 You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

13.2 You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

If you have any questions about this privacy notice, please contact:

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Approved