

Applicant Privacy Notice

September 2020

Introduction

This Applicant Privacy Notice sets out the basis on which any Personal Data about the Applicant will be processed by us.

For the purposes of Data Protection Legislation, Greenenergy acts as a data controller in respect of your Personal Data. Greenenergy is responsible for ensuring that it uses your Personal Data in compliance with all Data Protection Legislation.

Please ensure that you read the information set out below before submitting your CV and/or application form. You can also view our general Privacy Policy by accessing it online on our official website - www.greenenergy.com

In this notice:

“Greenenergy”, “we” or “us” means Greenenergy Group Holdings Limited and its wholly-owned subsidiaries.

“Personal Data” means any data which relates to an individual who can be identified from that data or from other information which is in the possession of, or is likely to come into the possession of, Greenenergy (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Greenenergy or any other person in respect of an individual.

“Regulatory Body” means any regulatory body by which Greenenergy is or becomes regulated.

“Data Protection Legislation” means the EU Data Protection Legislation and the other applicable data protection legislation in other jurisdictions, which may be applicable to you.

The types of personal data we process

The word “process” (and any derivative term) includes any operation that is carried out in respect of personal data, including but not limited to collecting, storing, using, disclosing, transferring or deleting personal data. Greenenergy typically processes the following Personal Data about you (this is a non-exhaustive list):

- » **Information that you provide to Greenenergy (for example, information provided to human resources):**
 - details of your name, right to work status (including passport, driving licence, birth or adoption certificate), contact information, date of birth, , qualifications, skills and work experience, details of previous remuneration, benefits and terms of employment, signature; and
 - information about your health.
- » **Information Greenenergy generates about you:**
 - results of interviews and assessments.
- » **Information Greenenergy obtains from other sources:**
 - Details of your suitability to work with us, background checks, including your past performance at work, verification of the information that you provide to us as part of your application, and if legally permitted, any history concerning criminal convictions, payroll and tax documentation.

Sensitive Personal Data

For the purposes of recruitment, special categories of Personal Data, such as racial or ethnic origin, trade union membership, genetic data, biometric data or data concerning health or sexual orientation (“sensitive personal data”), may be processed only as strictly required and as permitted or required by local law for the purposes of making adjustments to the recruitment process and provision of facilities in the workplace to accommodate health problems or for the establishment, exercise or defense of claims.

How we use your personal data

Your Personal Data may be processed by Greenenergy in the following ways and for the following purposes:

- » to carry out pre-employment checks and to consider your job application including, to verify the details that you provide and to ensure that you are suitable for the role for which you have applied);
- » if your application is unsuccessful, we may keep your information on record to notify you of relevant job vacancies with us that may be of interest to you, in the future;
- » in order to carry out and administer the operation of our business;
- » for legal reporting and diversity monitoring purposes; and
- » for the prevention and detection of crime or fraud, subject to local law.

Greenenergy is entitled to use your Personal Data in these ways:

- » in order to consider you for a position at Greenenergy;
- » we have legal and regulatory obligations that we have to discharge;
- » it is necessary for our legitimate business interests such as ensuring that we have made appropriate checks on the qualifications, education and experience that applicants tell us they have; or
- » in very limited scope, in order to protect the vital interests of the data subject e.g. to protect an interest which is essential for the life of the data subject; or
- » processing is necessary for reasons of public interest in the areas of public health such as protecting against serious cross-border threats to health; or

» the use of your Personal Data as described is necessary for legitimate business interests, such as:

- allowing Greenenergy to effectively and efficiently administer and manage the operation of its business;
- ensuring a consistent approach to the management of Greenenergy employees;
- maintaining compliance with internal policies and procedures; or
- being able to contact you or your family in the event of an emergency.

Processing of Sensitive Personal Data

Certain forms of Sensitive Personal Data are subject to specific protection or restriction by law in certain territories. For these purposes, "Sensitive Personal Data" is data relating to: racial or ethnic origin; criminal activity or proceedings in certain countries; political opinions; religious philosophical beliefs; trade union membership, genetic data, biometric data, data concerning health or sex life or sexual orientation. We will not process your Sensitive Personal Data unless such processing is compliant with Data Protection Legislation or you have provided your explicit consent to us processing your Sensitive Personal Data.

Disclosure of your personal data to third parties

Greenenergy may disclose your Personal Data to one or more of its wholly-owned or partially owned subsidiaries or its affiliates in the circumstances outlined below:

- » the management and administration of Greenenergy's business, including implementation of HR decisions; and
- » compliance with applicable laws, rules and regulations, and internal policies and procedures across Greenenergy.

Greenenergy may also share your Personal Data outside of Greenenergy group for the following purposes:

- » with third party service providers for the purposes of providing services to us (Greenenergy's background checks providers, IT and communications providers, providers of talent management platform). These third parties will be subject to confidentiality requirements and they will only use your Personal Data in accordance with our rules;
- » to the extent required by law, for example if Greenenergy is under a duty to disclose your Personal Data in order to comply with any legal obligation, which may include disclosure to regulatory bodies (including but not limited to law enforcement agencies); and
- » for the purposes of assessing your application and verifying the information you have provided.

International transfers

We operate globally and therefore your Personal Data may be processed and disclosed as described above in any country in which we conduct business or have a service provider. We will only transfer your Personal Information internationally if such processing is necessary and justifiable by the way we manage our business. You should be aware that data protection law in other countries may differ from the data protection law applicable to you in your country.

To the extent that applicable Data Protection Legislation does not allow or permit us to obtain your valid consent by virtue of providing this Policy to you, or otherwise rely on the other grounds set out in this Policy for disclosing your Personal Data outside of your jurisdiction under the Data Protection Legislation of your jurisdiction, we will obtain your explicit consent through other means.

In all cases, Greenenergy will ensure that any transfer of your Personal Data is compliant with Data Protection Legislation.

Retention of personal data

How long Greenenergy will hold your Personal Data for, will vary and will be determined by the following criteria:

- » the purpose for which Greenenergy is using your Personal Data - Greenenergy will need to keep your Personal Data for as long as is necessary to comply with the purposes for which the Personal Data was processed;
- » legal and regulatory obligations - laws or regulation may set a minimum period for which Greenenergy has to keep your Personal Data.

Your rights

To the extent provided by the laws of your jurisdiction, you may have legal rights in relation to the Personal Data we hold about you. These rights may include:

- » the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which Greenenergy holds about you;
- » the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that Greenenergy may still be entitled to process your Personal Data if it has another legitimate reason (other than consent) for doing so;
- » in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that Greenenergy transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided to Greenenergy;
- » the right to request that Greenenergy rectify your Personal Data if it is inaccurate, incomplete or outdate;
- » the right to request that Greenenergy erase your Personal Data in certain circumstances. Please note that there may be circumstances where you can ask Greenenergy to erase or destroy your Personal Data but Greenenergy is legally entitled to retain it;
- » the right to request that Greenenergy restrict its processing of your Personal Data in certain circumstances. Again, there may be circumstances where you ask Greenenergy to restrict its processing of your Personal Data but Greenenergy is legally entitled to refuse that request; and
- » the right to lodge a complaint with the relevant data protection regulator (if applicable) if you think that any of your rights have been infringed by Greenenergy.

You can enquire about your rights, which are applicable to you, by contacting Greenenergy, using the details listed below.

Use of personal data in relation to data subjects in canada and australia

Canada's Anti-Spam Legislation requires that a commercial electronic message ("CEM") sent within Canada or into Canada from another jurisdiction may only be sent to individuals who opt into receiving them, subject to certain exceptions. Similar legislation applies in Australia (Spam Act 2003). Such consent may be implicit, such as by engaging in a prior business relationship, or by virtue of having one's email address listed in a public directory.

These anti-spam laws also require senders to include an opt-out function within a CEM to allow you to opt-out of the collection or use of your information by Greenergy. In some cases, withdrawing your consent to the collection, use or disclosure of some or all of your personal information will prevent us from providing services to you. To opt-out, please contact Greenergy's Data Protection Officer using the details set out below or use the opt-out facility provided in the CEM. Please note that in some cases Greenergy is permitted to send you certain CEMs after you opt out, such as where required to enforce legal rights.

Questions and concerns

If you have any questions or concerns about Greenergy's handling of your Personal Data, or about this Notice, please contact our Data Protection Officer using the following contact information:

Address:

Greenergy
198 High Holborn
WC1V 7BD
LONDON
United Kingdom

Attention:

Data Protection Officer

Department:

Legal & Compliance

Email Address:

privacy@greenergy.com