

Privacy Notice for Candidates

What is the purpose of this privacy notice?

Ethos Energy Group Limited and its affiliates (“EthosEnergy”) are committed to protecting the privacy and security of your personal data. EthosEnergy is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you.

The purpose of this privacy notice is to inform you how and why your personal data will be used, namely for the purposes of the recruitment process.

Data privacy principles

We will comply with data privacy law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about;
- Kept securely.

The kind of information we hold about you

In connection with our recruitment process and/or your application for work with us, we will collect, store and use the following categories of personal information about you:

- The information you have provided to us in your resume/curriculum vitae and/or covering letter;
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, employment history, salary information, confirmation of your eligibility to work, qualifications;
- Any information you provide to us during an interview; and
- Any test results which we may carry out as part of the recruitment process.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records;
- Information about criminal convictions and offences.



How is your personal information collected?

In addition to collecting information directly from you, we may also collect personal information about candidates from third parties in connection with the recruitment process, including recruitment agencies, background check providers, credit reference agencies, your named references, or other publicly available sources such as LinkedIn.

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications and suitability for the role that you have applied for;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes;
- Comply with legal or regulatory requirements.

It is in our legitimate interests to use the personal information we collect about you to decide whether to appoint you to that role since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract of employment or for services with you.

Having received your resume/CV or application and where applicable, any test results, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to contact you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we may then contact references and/or where applicable carry out a criminal record check and/or carry out any other checks which may be necessary before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We may use your particularly sensitive personal information in the following ways:

- to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview;



- to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We may process information about criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

EthosEnergy will only share your personal information with third parties for the purposes of processing your application. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

International data transfers

EthosEnergy is comprised of a number of legal entities worldwide and thus your data may be transferred to and processed in the US and other countries that may not be deemed to provide the same level of data protection as your home country. We maintain and apply employment data protection standards consistent with those specified in this notice to our operations globally. Where necessary, we have entered into the EU style model clauses with the recipient Group company to ensure that adequate safeguards are in place to protect your personal data.

Data security

We have put in place appropriate security measures 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.

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.

Data retention

How long will you use my information for?

We will retain your personal information for a period of 2 years after we have communicated to you our



decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will ask you separately to give your explicit consent to us retaining your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **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;
- **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;
- **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, except where retention of your personnel data may be required by law. 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);
- **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;
- **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;
- **Request the transfer** of your personal information to another party.