

# Global Marine Group: Applicant Privacy Notice

## Introduction

Global Marine Group, of Ocean House, 1 Winsford Way, Boreham Interchange, Chelmsford, Essex, CM2 5PD, has prepared this Applicant Privacy Notice ("Notice") for applicants in respect of roles within Global Marine Group.

When we say "Global Marine Group", "we" or "us" in this document, we mean the Global Marine Group entity that you're applying to work for.

In this notice you will see reference to "GDPR" - that refers to UK's Data Protection Law which means the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") and any equivalent legislation amending, supplementing or replacing the GDPR, we also comply with the PECR regulations – which is the Privacy and Electronic Communications Regulations 2003.

## Privacy Information

We need to process your "Personal Data" in order to process your application for employment. We think that it is very important that you understand how we use your personal data, and we take our obligations in this regard very seriously. This notice gives you the necessary guidance about the processing we do, and your rights in relation to your personal data.

Please note that there are statutory requirements we need to comply with in relation to your application. In a situation where we cannot carry out the processing activities as described in this notice we may not be able to continue with your application. Of course, we hope it would never come to that, and this is simply information we are obliged to tell you as part of this notice.

## Consent

In most cases we will process your personal data for the reasons set out in this notice and it won't be appropriate or necessary for you to provide consent as we can do so under other lawful basis.

However, in certain circumstances, we need your consent to process your personal data, such as for the purpose of conducting background checks and enquiries about you, or to enable relevant third parties to release information about you in respect of your application.

We ask that you please complete and sign the consent form at the end of this Privacy Notice and return it with your application or as directed, this will allow us to complete the our processes for your application.

## Personal data provided by you about or from a Third Party

Where you provide personal information relating to or from a third parties (e.g. your referee or Next of Kin), the company considers that you have received and warrant the consent from the individual/s to do so, and that the information is accurate and up-to-date. It remains your responsibility to inform us if the wishes of the third party changes or, if any of their personal information changes up until the time we make positive contact with that individual.

## What categories of personal data does Global Marine Group collect about me?

"**Personal data**" means any information relating to you. We will collect, process and use the following categories and types of personal data about you: (generic & non-exhaustive list)

- **Identification data**, such as your name, citizenship, passport data, photo, drivers' licence information, national insurance number, health insurance governmental, retirement plan information, HMRC and IR data;
- **personal information**, such as your date and place of birth, emergency contact details, and gender;
- **contact details**, such as your home address, telephone number email address;
- **education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience;
- **other application data**, such as the information included in your application form and CV;
- **information collected as part of the interview process**, such as notes taken from your interview information provided from recruitment agencies;
- **back ground checks information**, such as personal data obtained through reference checks confirmation about your work/educational background.
- **health and medical data**, such as information on disability;
- **race or ethnicity data** such as information contained in your passport or other citizenship; and
- **right to work** documentation.

### Why do you need my personal data?

#### Why does Global Marine Group need to collect, process and use my Applicant Data and what is the legal basis for doing so?

We can only collect and use personal data if we have a valid legal basis for doing so, and we are required to explain the various legal bases that we rely on.

We have set out each of the reasons why we collect and use Personal Data, i.e. the processing purposes, and mapped these against the different legal bases that allow us to do so. We appreciate that this is quite a lot of information to take in, so please bear with us:

Processing Purpose	Legal Basis
1) Administering and processing your application (including processing a job offer should you be successful)	Processing Purposes 1 to 3: <ul style="list-style-type: none"> <li>• Necessary for performing a contract with you as the data subject;</li> <li>• Compliance with legal obligations which Global Marine Group is subject to</li> </ul> In relation to employment law; <ul style="list-style-type: none"> <li>• Legitimate interests of Global marine Group</li> <li>• Your consent as data subject.</li> </ul>
2) To determine your eligibility for the role you applied for.	
3) Conducting background checks as part of your application.	
4) Complying with applicable laws and employment-related requirements	Processing Purposes 4 & 5 <ul style="list-style-type: none"> <li>• Compliance with legal obligations which Global Marine Group is subject to, particularly in relation to tax law, employment law, social security law and immigration law; and</li> <li>• Legitimate interests of Global Marine Group.</li> </ul>
5) Monitoring and ensuring compliance with applicable policies and procedures and laws,	
6) Communicating with you, including communicating future employment opportunities, which involves the processing of identification data and your contact details.	Processing Purpose 6: <ul style="list-style-type: none"> <li>• Necessary for performing a contract with you as the data subject - we need to be able to communicate with you so that we needed to enter into a contract with you;</li> </ul>

	<ul style="list-style-type: none"> <li>• Compliance with legal obligation to which data controller is subject; and</li> <li>• Legitimate interests of Global marine Group.</li> </ul>
7) Responding to and complying with requests and legal demands from regulators or other authorities	<p>Processing Purpose 7:</p> <ul style="list-style-type: none"> <li>• Compliance with legal obligations which Global Marine Group is subject to.</li> </ul>
8) Complying with corporate financial responsibilities,	<p>Processing Purpose 8:</p> <ul style="list-style-type: none"> <li>• Legitimate interests of Global Marine Group, i.e. we need to ensure that we manage our business effectively; and</li> <li>• Compliance with legal obligations which Global Marine Group is subject to.</li> </ul>

Below are the processing purposes and corresponding Legal Bases for Sensitive Applicant Data:

Processing Purpose	Legal Bases
1) To accommodate your application and interview and for compliance with legal obligations, we may use health and medical data.	<ul style="list-style-type: none"> <li>• Your explicit consent as allowed by local data protection law; and</li> <li>• Necessary to carry out the obligations and to exercise specific rights of Global Marine Group or you in the field of employment and social security and social protection law as permitted by local data protection law.</li> </ul>
2) Right to work checks or visa and immigration checks may involve us using race or ethnicity data such as information contained in your passport or other citizenship and right to work documentation.	<ul style="list-style-type: none"> <li>• Necessary for reasons of substantial public interest as permitted by local data protection law; and</li> <li>• Necessary for reasons of substantial public interest as permitted by local data protection law.</li> </ul>

When relying on the legitimate interest basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data.

### Who might Global Marine Group share my personal information with?

Your information may be shared with any of the entities within the Global Marine Group network. It is our policy to limit the individuals and departments who have access to that personal information.

We may transfer personal data to third parties, including to entities within and outside the Global Marine Group, these processors, may be located in any jurisdictions where Global Marine Group entities are located.

As the Global Marine entity that you are applying to is part of a wider group headquartered in the UK with offices, technical bases and vessels located across the globe, and given that we operate through shared services, we may transfer your Applicant Data to, or otherwise allow access to such data by other entities within the Global Marine Group.

As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent

external advisors (e.g., auditors), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).

As necessary personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions. The processor may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities.

As you may expect, some of the recipients we may share Applicant Data and Sensitive Applicant Data with countries located outside the European Union and/or European Economic Area ("EEA").

Some countries where recipients may be located already provide an adequate level of protection for this data, and transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. Nonetheless, for transfers to Global Marine Group entities outside of the EEA, Global Marine Group will be bound by the EU Standard Contractual Clauses pursuant to Article 46(2)(c) GDPR, which the European Commission has assessed as providing an adequate level of protection for personal data, to ensure that your data is protected adequately.

If recipients are located in other countries without adequate protections for personal data, Global Marine Group will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses.

### How long will Global Marine Group keep my personal information for?

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep your personal information for a reasonable time after your application process is completed, in case we have future job opportunities that we consider you are suitable for. Where personal information is kept, that period will be determined based on the applicable local law. For further information, contact us as set out below.

A failed applicants personal data will be held for 6 months. Please be advised that as an unsuccessful applicant your cv and contact details will be transferred into our Talent Pool and held for a period of two years. You can exercise your right to object to this process at any time.

### What rights do I have in respect of my personal information?

You have a number of rights in relation to your Applicant Data. For GDPR these can be summarised as follows:

#### **1. Right to be Informed**

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR. There are a few circumstances when we do not need to provide people with privacy information, such as if an individual already has the information or if it would involve a disproportionate effort to provide it to you.

#### **2. Right of Access**

You have the right to request a copy of the *personal data* that we hold about you. Your request will be processed and the information to which you are entitled will be collated and provided to you no later than 30 days (except in extenuating circumstances) from when we receive your request, subject to the requirements and exemptions of Data Protection Law. If such extenuating circumstances mean

we are unable to comply with your request within one month, we will tell you as soon as possible about this delay.

### **3. Right of Rectification**

You have a right to correct *personal data* that we hold about you that is inaccurate or incomplete. Where your *personal data* is inaccurate or where you would like us to complete any incomplete information, you can provide us with a statement that sets out the details of your request for rectification.

### **4. Right to be Forgotten**

In certain circumstances you can ask for the data we hold about you to be erased from our records. You can request that the Company deletes your personal Information where it does not have grounds to continue processing your personal data. If the Company is unable to comply with your request we will advise you immediately in this instance.

### **5. Right to Restrict Processing**

You have the right to restrict processing, Note: this is not an absolute right and only applies in certain circumstances. The company can refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

If the company considers that a request is manifestly unfounded or excessive the company will:

- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

### **6. Right of Portability**

The right to data portability, gives you the right to receive *personal data* previously provided to the company, in a structured, commonly used and machine readable format. It also gives you the right to request that a company transmits this data directly to another controller.

### **7. Right to Object**

In some circumstances you can request to restrict the Company's processing of your personal Information.

### **8. Rights in relation to automated decision making and profiling.**

GDPR has additional rules to protect you if the company chooses to carry out solely automated decision-making processes that have legal or similarly significant effects on you. Please Note: Global Marine Group does NOT make any employment related decisions based solely on the use of automated systems, databases or computer applications.

## **Exercising your rights**

To exercise your rights in the first instance please write to the company's HR Director or the companies Data Protection Officer (DPO) and send to:

Global Marine Group (FAO: HR Director or/ and Data Protection Officer),  
Ocean House,  
1 Winsford Way,  
Boreham Interchange,  
Chelmsford,  
Essex,

CM2 5PD, England.

If you remain dissatisfied following our response to any enquiry you can address your concerns to the Information Commissioners office (ICO), by contacting them via their livechat service, [ico.org.uk/livechat](https://ico.org.uk/livechat) or calling their help line on **0303 123 1113**, or via their website [www.ico.org.uk](https://www.ico.org.uk).

### Applicants Consent to Process Personal Data

I understand that if Global Marine Group makes me an offer of employment, such offer will be conditional upon receipt of satisfactory references.

I confirm that all information given by me in respect of my application is correct, accurate and up-to-date. I will advise Global Marine immediately if any of my personal information changes.

I understand that Global Marine Group is not relying on consent as the legal bases for conducting the background checks under data protection law, but is obtaining consent for practical purposes, so that those providing input to my application will be able to do so.

Please clearly write YES or NO in the boxes provided to indicate your consent as noted.

I hereby give my consent for Global Marine Group and/or their designated third parties to conduct the necessary undertakings in respect of my application.

I hereby confirm that where and when I provide personal information relating to or from any third party (e.g. for a referee or Next of Kin), I have received and warrant the consent from the individual/s to do so, and that the information I give is accurate and up-to-date. I understand that It remains my responsibility to inform Global Marine Group if the wishes of the third party changes or, if any of their personal information changes up until the time Global Marine Group make positive contact with that individual.

In the event that you “DO NOT” consent to Global Marine Group undertakings in respect of your application please indicate “NO” in the above tick boxes, then sign and return this form to Global Marine Group.

**Title & Full Name of Applicant** .....

**Signed** .....

**Consent Date** .....

**Job Role (title) applied for.** .....

Unless advised otherwise please return this consent form to :

Global Marine Group (FAO: HR Director),  
Ocean House,  
1 Winsford Way,

Applicant Privacy Notice – continued..

Boreham Interchange,  
Chelmsford,  
Essex,  
CM2 5PD, England.