

ENERGY SEARCH COLLECTIVE Privacy Notice

The ENERGY SEARCH COLLECTIVE ("we") are committed to protecting and respecting your privacy.

This notice (together with any terms of use on our websites, any contracts between us and any other documents referred to in this notice) sets out the basis on which any personal data we collect from you, that you provide to us, or that we obtain about you from other sources, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting any of our websites, or by providing us with any information about yourself you are accepting and consenting to the practices described in this policy.

The ENERGY SEARCH COLLECTIVE Limited (registered in England and Wales under registered number 09813552, with its registered office at The Agora, Ellen Street, Hove, East Sussex BN3 3LN, United Kingdom) along with all of its group undertakings as defined in s1161(5) of the UK Companies Act 2006, wherever in the world they may be situated.

For the purpose of the General Data Protection Regulation (Regulation (EU 2016/679) as amended or replaced from time to time ("**Data Protection Law**"), each operating undertaking in the ENERGY SEARCH COLLECTIVE (i.e. excluding non-trading and dormant undertakings), may be a joint data controller in respect of data processed by each other operating undertaking. References to "**we**" in this notice are therefore references to the relevant member of the ENERGY SEARCH COLLECTIVE.

According to Data Protection Law an individual may exercise his or her rights against each or any joint data controllers. However, in the first instance, you should contact Chris Swain at the above address or by email at info@energy-s-c.com in the event that you have any issues related to data protection or this notice. That person is our Data Protection Officer.

1. Information we collect from you

We will collect and process the following data about you:

1.1. Information you give us.

This is information about you that you give us by filling in forms on our site at www.energy-s-c.com or other sites from time to time ("**our site**") or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you send us your CV (or passport or driving licence), register to use our site, subscribe to any service we offer, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site or services. The information you give us may include your name, home address, e-mail address and phone number, financial and credit card information, salary, personal description and photograph, career information, education information, qualifications, National Insurance number and information concerning next of kin. By providing information about any other individuals such as next of kin, you

warrant to us that you are entitled to provide that information to us and to authorise us to process it on the same basis as we will process the rest of the data you provide about yourself.

1.2. **Information we collect about you.**

With regard to each of your visits to our sites we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions of operating system and platform,
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.

1.3. **Information we receive from other sources.**

This is information we receive about you from sources other than directly from yourself, which may include social media such as LinkedIn, Facebook, Twitter and Instagram.

2. **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

3. **Purposes for which we may process the information**

We use information held about you in the following ways:

3.1. **Information you give to us.**

We will use this information:

- where you are a candidate, to provide such information to prospective employers;
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with information or services that you request from us;
- to provide you with information about other services we offer that are similar

to those that you have already enquired about;

- to notify you with information or opportunities that we feel may be of interest to you;
- to notify you about changes to our service;
- to ensure that content from our sites is presented in the most effective manner for you and for your computer.

Please note that, where you are asked to provide information to us which is of a sort that is necessary to enable us to perform a contract or fulfil a request that you make (eg contact, delivery or payment information) it is a requirement for us to enter and perform such a contract or fulfil your request that you provide that information – if you do not do so, we may not be able to perform your contract or fulfil your request.

3.2. Information we collect about you.

We will use this information:

- to administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our sites to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant information and/or advertising to you;
- to make suggestions and recommendations to you and other users of our site about information or opportunities that may interest you or them.

3.3. Information we receive from other sources.

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4. Disclosure of your information

4.1. We may share your personal information with:

- 4.1.1. any of our group undertakings, as defined in section 1162 of the UK Companies Act 2006, provided that they (a) are within the European Economic Area, or (b) are in a country that the European Union has decided has adequate data protection laws in place, or (c) have provided appropriate data protection safeguards of the sort approved by the European Union and provide effective

rights and remedies for you. Any use by other group members of one group member's personal data beyond administration will be subject to all the requirements of Data Protection Law;

4.1.2. where you are a candidate or contractor, potential employers and/or hirers provided that you have given either a general approval to us which covers our provision of your information to such potential employers/hirers or a specific approval for us to provide your information to a specific potential employer/hirer.

4.1.3. Selected third parties including:

- Experian (or similar agencies) for financial vetting, right to work and ID verification purposes.
- HMRC
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

4.2. Additionally, we may disclose your personal information to third parties:

4.2.1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

4.2.2. If we or a substantial part of our assets are acquired by a third party, in which case personal data held by us about our clients and candidates may be one of the transferred assets.

4.2.3. If we are under a duty to disclose or share your personal data in order to comply

with any legal obligation, or in order to enforce or apply the terms of any agreement or policy to which we are a party, or to protect the rights, property, or safety of ENERGY SEARCH COLLECTIVE, our customers, or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5. Legal basis of processing

5.1. Data Protection Law requires us to meet at least one “legal ground” for processing, currently set out in Article 6 of the General Data Protection Regulation. The grounds applicable to the personal data to which this policy relates are:

5.1.1. Where the processing is necessary for us to perform a contract that you are party to, or to take steps at your request prior to entering a contract, that is the ground on which we are processing that data;

5.1.2. Where the processing is necessary for compliance with a legal obligation to which we are subject, that is the ground on which we are processing that data;

5.1.3. Where processing is necessary for the purposes of our legitimate interests or the legitimate interests of a third party, that is the ground on which we are processing that data, provided that your fundamental rights and freedoms which require protection of your data override those legitimate interests (our legitimate interests comprise the management, marketing and promotion of our business and services, and the provision of information about candidates to our clients);

5.1.4. If you have given your consent to our processing the data, that is the basis on which we are processing that data.

If more than one of the above grounds apply to the processing of data in question, the applicable ground will be the one that is set out first above.

5.2. Special categories of personal data

If you provide us with any special categories of personal data (that is to say information as to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sex life or sexual orientation or genetic or biometric data) or personal data relating to criminal convictions and offences, it is a condition of us receiving that information that you expressly consent (and you hereby do) to us processing that personal data for the purposes set out in clause 3.

6. Where we store your personal data

6.1. The data that we collect from you will be stored on our secure servers or those of our service providers. It will not be transferred to, and stored at, a destination outside the European Economic Area ("EEA") unless:

- 6.1.1. to one of our group undertakings to which section 4.1.1 applies; or
- 6.1.2. To a processor acting on our behalf which is either (i) within the EEA, or (ii) in a country that the European Union has decided has adequate data protection laws in place, or (iii) has provided appropriate data protection safeguards of the sort approved by the European Union and provide effective rights and remedies for you.
- 6.2. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential, and for all use made of your account with such password. We ask you not to share a password with anyone.
- 6.3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. Length of data storage

- 7.1. Our policy is to ensure that personal data is only stored for as long as is necessary for the purposes set out at section 3 above. This may vary according to the type of information and the specific applicable purpose(s). We have a detailed data retention and destruction policy which governs the length of time for which we hold your data in personally identifiable form. The timing of our retention, anonymisation and/or destruction of your personal data is determined according to the criteria set out in that policy. We can provide you with relevant details applicable to your data on request – please see section 8.2 below as to how to request this information.

8. Your rights

- 8.1. You have various rights under Data Protection Law. These include:
 - 8.1.1. The right to ask us not to process your personal data for direct marketing purposes, even if you have given consent;
 - 8.1.2. If our processing is based on your consent, the right to withdraw any consent you may have given for our processing of your data – if you exercise this right, we will be required to stop such processing if consent is the sole lawful ground on which we are processing that data;
 - 8.1.3. The right to ask us for access to the data we hold about you (see section 9 below for further details);
 - 8.1.4. The right to ask us to rectify any data that we hold about you that is inaccurate or incomplete;

- 8.1.5. The right to ask us to delete your data in certain circumstances;
 - 8.1.6. The right to ask us to restrict our processing of your data in certain circumstances;
 - 8.1.7. The right to object to our processing of your data in certain circumstances;
 - 8.1.8. In certain circumstances, the right to require us to give you the data we hold about you in a structured, commonly used and machine-readable format so that you can provide the data to another data controller.
- 8.2. You can exercise any of the rights set out above, free of charge, by using any applicable methods set out in our communications with you, or by contacting us at info@energy-s-c.com. In respect of certain of the rights referred to above, your right may be qualified by the GDPR (which we will discuss with you following your request) or we may need more information from you, which we will ask you for following your request. We may ask you to provide further information in order to confirm your identity. Please also note that if you submit unfounded or excessive (for example repetitive) requests to exercise any of these rights, we reserve the right to make a reasonable charge for providing the requested information or taking the requested action, or to decline your request.
- 8.3. You also have the right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk) if you are concerned that we are not respecting your rights under Data Protection Law. The Information Commissioner's Office is the authority in the UK which is responsible for overseeing the application of, and enforcing, Data Protection Law.

9. Accessing your data

You have the right to obtain from us:

- 9.1. Confirmation as to whether we are processing (including holding) personal data about you; and
- 9.2. If we are processing personal data about you, you are entitled to be provided with:
 - 9.2.1. Information as to the purposes for which we process the data;
 - 9.2.2. Information as to the categories of the data that we are processing;
 - 9.2.3. Information as to the recipients or categories of recipients to whom the data has or will be disclosed;
 - 9.2.4. Information as to the envisaged period for which we will store the data, or the basis on which that period will be determined;
 - 9.2.5. A copy of the data (further copies are available at a reasonable charge, which

we will inform you of should you request further copies). Please note that this right is subject to the rights of others in relation to their own personal data, meaning that we cannot disclose data to you if it would involve disclosing data about someone else.

- 9.3. Please see section 8.2 above as to how to exercise your rights under this section 9. Section 8.2 applies in full to the exercise of these rights.

10. Automated decisions

We may, based on information that you provide or that we collect about you, make certain decisions on an automated basis. In certain circumstances, you have the right to object to such decisions being made on an automated basis, for example by having human intervention on our part in the decision-making process, by being able to express your point of view in relation to the decision or being able to contest the decision. If you do not want us to take such decisions on an automated basis, please see section 8.2 above. Section 8.2 applies in full to the exercise of these rights.

11. Other websites

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

12. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

13. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@energy-s-c.com