

1. Purpose of this document

- 1.1. Enovert Management Limited is committed to protecting the privacy and security of your personal information.
- 1.2. 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 Regulation (GDPR) and applies to all customers, employees, suppliers and contractors.
- 1.3. 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. Information we may hold about you

- 2.1. Personal data, or personal information, means any information about an individual from which that person can be identified. There are "special categories" of more sensitive personal data which require a higher level of protection.
- 2.2. We will only collect information from you which is relevant to the matter we are dealing with. We may collect the following information from you which is defined as "personal data":
 - Personal details
 - Family details, such as next of kin and emergency contact information
 - Information about your use of our information and communication systems
 - Recruitment information (including copies of right to work documentation, references and other information included in a CV as part of the application process)
 - Employment records (including job titles, work history, working hours, training records and professional memberships).
 - Employee payroll records, bank account details and tax status
 - Business activities of the person whose details we are processing
 - Customer and supplier financial information such as credit checks and financial details relating to payments
 - CCTV footage and other information obtained through electronic means such as waste transfer tickets and digital signatures
- 2.3. We may also collect, store and use the following "special categories" of more sensitive personal information:
 - Information about your race or ethnicity, religious beliefs, sexual orientation
 - Trade union membership
 - Information about your health, including any medical condition, health and sickness records
 - Information about criminal convictions and offences

3. Basis for Processing

- 3.1. 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:
 - Where you have given us your consent
 - Where it is necessary for the performance of our contract with you.

- Where we need to comply with a legal obligation
- 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

3.2. We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

4. Situations in which we use personal information

4.1. We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

4.2. We may use your information for the following purposes:

- Administering the contract we have entered into with you
- To support and manage our employees
- Making decisions about recruitment or appointment.
- Complying with health and safety obligations
- To carry out credit checks
- To prevent fraud

5. How we use particularly sensitive personal information

5.1. "Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations
- Where it is needed in the public interest, such as for equal opportunities monitoring
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards

5.2. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

6. Information about criminal convictions

6.1. We may only use information relating to criminal convictions where the law allows us to do so. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

6.2. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

7. Change of purpose

- 7.1. 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.
- 7.2. Please note that we may process your personal information without your knowledge or consent, in compliance with the above principles, where this is required or permitted by law.

8. Data sharing

- 8.1. We may have to share your data with third parties, including third-party service providers and other entities in the group. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We require third parties to respect the security of your data and to treat it in accordance with the law.
- 8.2. All our third-party service providers 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.
- 8.3. We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

9. Data security

- 9.1. 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.
- 9.2. 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.

10. Data retention

- 10.1. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.
- 10.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 10.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

11. Rights of access, correction, erasure, and restriction

11.1. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Under certain circumstances, by law you have the right to:

- Request access to your personal information
- Request correction of the personal information that we hold about you
- 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
- 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
- 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

11.2. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Privacy Manager, Steve Rogers, in writing.

11.3. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12. Right to complain

12.1. If you are unhappy about how we are using your information or how we have responded to your request then initially you should contact our Data Privacy Manager, Steve Rogers in writing.

12.2. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details are available at www.ico.gov.uk.

13. Changes to this privacy notice

13.1. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Issue 1.0 JULY 2018

The "Company" is defined as the operating companies Enovert Management Limited (EML), Enovert South Limited (ESL), Enovert North Limited (ENL) and Enovert Energy Limited (EEL).