



DATA PROTECTION STATEMENT AND PRIVACY NOTICE (Job Applicants)

NRG Systems ("NRG", "Company", "we", "our" and "us") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This Privacy Notice applies to all job applicants and describes how NRG handles personal data you submit when applying for work with us. Please read this document carefully to understand how NRG uses and protects the information you provide.

Data protection principles:

We will comply with data protection laws 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.

Providing your application data is voluntary. However, if you decline to submit requested candidate data, our ability to consider you as a candidate may be limited. 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.

What data do we collect and process about you?

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

- Your name, contact details and candidate status, date of birth, gender.
- Information included in your CV/resume or cover letter, such as job history, academic background and qualifications, skills and competencies, personal interests, languages spoken, questionnaire results.
- Job preferences and type of employment sought, willingness to relocate.
- Names and contact details for references. Please note that it is your responsibility to obtain consent from your references prior to providing us personal information about them.
- Any information you provide to us during an interview.
- Current and historic salary details together with salary expectations.
- NRG may collect data directly from you or from third parties, for example when doing a background check or employment reference. This is subject to your consent where required by law.

We may also collect, store and use "special categories" of more sensitive personal information, for example, information about criminal convictions and offences.

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies.
- Your named referees.

For what purpose will your data be used?

The personal data you provide in your application and as part of the recruitment process will only be held for 12 months and processed to facilitate the selection process. Your personal data may be used to assess your application for employment at NRG, to verify your information, to conduct reference checks, to communicate with you, to keep records of our hiring process and to comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to work for us 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 with you.

Having received your CV/resume and/or cover letter, 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. During the interview process, we will use the information you provide to us to decide whether to offer you the role. If we do extend an offer, we will then check references before beginning your employment.

If you do accept our offer, the data collected during the interview process will become part of your employment record and will be used for employment purposes.

How we use particularly sensitive personal information:

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

- If a disability status applies, we will use this information to consider whether we need to provide appropriate adjustments during the recruitment process, for example during the interview process.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions:

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular, if the role requires a high degree of trust and integrity, we would like to ask you to seek a basic disclosure of your criminal records history.

Automated decision-making:

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

Who can access your data?

Only selected employees of NRG such as management team members, potential future department managers and/or HR staff, as well as any selected third parties who support us with the recruitment process, have access to your personal data in accordance with the Company Privacy Policy. Except as set out in this notice or as required by law, your personal data will not be supplied to any third party without your explicit authorization.

Data sharing:

We will only share your personal information with the following third parties for the purposes of processing your application, for example, recruitment agencies. All 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.

What is our data retention process?

Your personal data shall not be kept for longer than is necessary. This is 12 months after we have communicated to you our decision about whether to offer you the 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 for future consideration, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis. If you do not want to be considered for other positions, NRG will delete all your data. If we do not receive a response within 4 weeks, we will delete your records.

If your application has been successful and you are hired, the corresponding application data may be used in connection with your employment consistent with our Privacy Policy.

What are your rights?

You may exercise the following rights in relation to your candidate data:

- **The right to be informed.** This privacy notice gives you transparency on how NRG processes and handles your personal data. If you have any questions, please do not hesitate to contact us.
- **The right of access (known as a data subject access request).** You are allowed anytime and free of charge to access your personal data so that you are aware of and can verify the lawfulness of the processing. Information will be provided without delay and at the latest within one month of receipt.
- **The right to request correction.** You are entitled to have personal data rectified if it is inaccurate or incomplete.
- **The right to request erasure or to be forgotten.** You can request the deletion or removal of your personal data where there is no compelling reason for its continued processing.

- **The right to restrict processing.** You have the right to suppress processing of personal data.
- **The right to data portability.** This allows you to obtain and reuse your personal data for your own purposes across different services.
- **The right to object to processing.** You have the right to object to a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, b) direct marketing and c) processing for purposes of scientific/historical research and statistics.
- Rights in relation to automated decision making and profiling.

Right to withdraw consent:

You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact privacy@nrgsystems.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

How can you to contact us?

We are responsible for monitoring compliance with relevant legislation in relation to the protection of personal data. You can exercise your rights at any time and get further information regarding the processing of your application data and NRG's general Privacy Policy by contacting us at privacy@nrgsystems.com.

Amendment and Revision:

This Policy may be revised from time to time. This Policy was last revised on 24 May 2018.