



Hurricane

# Privacy Notice for Candidates

**HUR-COR-LEG-STA-0002-1**

December 2020

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## Amendment Record

Revision	Date	Description	Author	Checked	Approved
1	December 2020	Updated to reflect legislative changes as a result of Brexit	LMD	DJJ	RPC
0	29 May 2018	Approved for issue	LMD	DJJ	AS
A0	02 May 2018	Initial draft	LMD	DJJ	AS

### Notes



## 1. PURPOSE

Hurricane is made up of different legal entities, details of which can be found in our Annual Report and Accounts. This privacy notice is issued on behalf of the Hurricane Group so when we mention “Hurricane”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Hurricane Group responsible for processing your data.

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 retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR).

Hurricane is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UKGDPR.

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. DATA PROTECTION PRINCIPLES

We will comply with data protection 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

## 3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identify has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

In connection with 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 curriculum vitae and covering letter
- Any information you provide to us during an interview



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

## 4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate
- The relevant recruitment agency, from which we collect the information provided to the recruiter in your Curriculum Vitae
- Disclosure and Barring Service in respect of criminal convictions
- Your named referees, from whom we collect the following categories of data: your roles and titles, your dates of employment or engagement, your attendance and disciplinary record

## 5. 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 work / role
- 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

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and covering 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. If we decide to call 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 will then take up references before confirming your appointment.

## 6. 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.

## 7. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

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



- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview
- We will use information about your race or national or ethnic origin and gender to ensure meaningful equal opportunity monitoring and reporting

## 8. INFORMATION ABOUT CRIMINAL CONVICTIONS

We envisage that we will process information about criminal convictions. Our lawful basis for processing this data is that it is within the legitimate interests of the company to process this data, is in line with candidates reasonable expectations and will not result in an unwarranted impact on a candidate.

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, roles within the finance, legal and compliance function require a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history

## 9. AUTOMATED DECISION-MAKING

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

## 10. DATA SHARING

### 10.1. WHY MIGHT YOU SHARE MY PERSONAL INFORMATION WITH THIRD PARTIES?

We will only share your personal information with recruitment and search agencies 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.

## 11. 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.



## 12. DATA RETENTION

### 12.1. HOW LONG WILL YOU USE MY INFORMATION FOR?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to 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 our data retention policy.

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 write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## 13. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### 13.1. 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. 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). Please note that whilst we will erase all personal data when requested to do so, there are certain legal obligations that must be fulfilled, therefore the erasure may not be absolute
- 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

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 the Compliance Manager in writing at [hurricane.compliance@hurricaneenergy.com](mailto:hurricane.compliance@hurricaneenergy.com).



## 14. RIGHT TO WITHDRAW CONSENT

When you applied for this role, you provided consent on [DATE] to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our Compliance Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our personal data retention policy, we will dispose of your personal data securely.

## 15. RIGHT TO LODGE A COMPLAINT

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact the Compliance Manager in the first instance using the details set out below.

Hurricane Energy plc

Lynn-Marie Denyer – Compliance Manager

Email address: [hurricane.compliance@hurricaneenergy.com](mailto:hurricane.compliance@hurricaneenergy.com)

Postal address: The Wharf, Abbey Mill Business Park, Lower Eashing, Godalming, Surrey, GU7 2QN

Phone number: +44 1483 862820

## 16. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to change this Privacy Notice at any time without notice to you so please check back regularly to obtain the latest copy of this Privacy Notice.

This Privacy Notice does not override any applicable national data privacy laws and regulations in countries where the Company operates.

## 17. COMPLIANCE MANAGER

We have appointed a Compliance Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Compliance Manager using the details set out in section 15.