

# ANGLO-EASTERN PRIVACY NOTICE

## for Prospective Employees

### Who we are

**Anglo-Eastern** is a ship management company.

Anglo-Eastern respects the privacy of our prospective employees and we recognise the need for appropriate protections and management of your personal information.

We want to give you a clear view of what personal data we collect and how we use it. This Privacy Notice applies to the use of personal data and other information by Anglo-Eastern that is collected from you.

When we collect and use your personal information and special category data, we are the data controller for the purpose of the Data Protection Legislation (defined below).

### Key terms

- **Data Protection Legislation** refers to the General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”); any legislation implemented to give effect to the derogations permitted under the GDPR; and/or any other applicable data protection legislation.
- **Personal data** is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, e-mail address, etc., and also online identifiers and location data, such as IP addresses and mobile device IDs.
- **Special category data** means personal information revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data; data relating to your health; data concerning your sex life or sexual orientation; and/or criminal convictions or involvement in criminal proceedings.
- **Data controller** refers to the individual who decides why personal data is to be collected and how it will be used and treated.

### How to contact us in connection with the content of this Privacy Notice

If you are unhappy with how we handle your personal information, you can write to us using the contact e-mail addresses below:

- Our group Data Protection Officer at [dpo@angloeastern.com](mailto:dpo@angloeastern.com)
- Our EU Representative at [eurep@angloeastern.com](mailto:eurep@angloeastern.com)



If you are not satisfied with our response or believe we are processing your personal data in a manner not in accordance with relevant legislation, you have the right to lodge a complaint with the supervisory authority in the place of your habitual residence, or the place where you believe the infringement has occurred.

## **What is the purpose of this Privacy Notice?**

This Privacy Notice sets out the basis on which the company will process your personal data and your special categories of personal data in accordance with the Data Protection Legislation.

## **What personal data will we process?**

Usually, we will have access to the following personal data: your full name, including (if applicable) your preferred name and previous surname; your gender; your work and personal e-mail addresses; your date of birth; your home address; your mobile number and your home phone number; your current and previous employment details/history; your professional membership details and training certificates (if applicable); passport details; medical information; and reference details.

The personal data we hold about you may have been supplied by you or on your behalf:

- in the form of a curriculum vitae (CV) that has been delivered to us (usually by you or on your behalf (for example by a recruitment consultant or agency), by e-mail, by post, or by hand). We believe that all information that you supply to us in your CV is relevant to our recruitment process;
- via the “Careers” page of our website; and
- in person or over the telephone.

We may collect your personal data via other means, including but not limited to: e-mails you send to us; from referees whose details you provide to us; details acquired from sources in the public domain; and exchanged business cards.

## **How will we use your personal data?**

We will hold and process your personal data and special categories of personal data to carry out our recruitment functions, namely:

- making a decision about your recruitment or appointment;
- communicating with you about the recruitment or appointment process;
- carrying out background and reference checks, where applicable;
- determining the terms on which to offer work, employment or consultancy with us;
- managing any disabilities or special needs you have, including administering adjustments to work and/or the recruitment process;
- dealing with legal disputes involving you, or other employees, workers and contractors, including employment disputes;
- complying with health and safety obligations;
- equal opportunities monitoring; and
- complying with our legal obligation to ensure that you are entitled to work in the UK.



## **Legal basis on which we use your personal data**

We will use your personal data on the following legal basis:

- it is necessary for us to comply with our legal obligations;
- it is necessary for our legitimate interests, except where your interests and rights override those;
- it is necessary to protect your interests or those of someone else; and/or
- it is necessary to process your personal data to decide whether to enter into a contract with you for employment, work or services.

If you fail to provide information when requested that 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 references for a role and you fail to provide us with relevant details, we will not be able to take your application further.

## **Legal basis on which we use your special categories of personal data**

We will use your special categories of personal data on the following legal basis:

- it is necessary for the purposes of carrying out our obligations and exercising our rights in the area of employment, as authorised by EU law;
- it is in the public interest, for example, to assess equality of opportunity or treatment, or to prevent fraud;
- it is necessary to protect your (or someone else's) vital interests and you are not capable of giving your consent;
- it is necessary to establish, exercise, or defend legal claims;
- it relates to personal data that is manifestly made public by you; and/or
- where we have your express written consent.

## **Legal basis on which we use information about criminal convictions and offences**

We will only collect information about criminal convictions if it is appropriate given the nature of the role. We may also only use information relating to criminal convictions where the law permits it. Where appropriate, we will collect information about criminal convictions as part of the recruitment process.

We will use information about your criminal convictions and offences on the following legal basis:

- where it is appropriate for the role or work for which you have applied and you have agreed to us carrying out a criminal records check;
- it is necessary to carry out our obligations, and provided we do so in line with this policy;
- it is necessary to establish, exercise, or defend legal claims;
- it is necessary to protect your (or someone else's) interests and you are not capable of giving your consent; and/or
- you have already made the information public.



## How do we keep your personal information up to date?

If you wish to update or change the information we hold in relation to your application or how we use it, you can do so by contacting our local recruitment team.

Please ensure you notify us of any updates, amendments and corrections to your information by contacting us via the means above as soon as possible following any change to your personal information, including your contact details.

## How long will we hold onto your data?

We will not store your personal data and/or special categories of personal data longer than necessary for the uses outlined above, unless we are required to do so in order to comply with the law and/or any regulatory requirements.

We shall retain your information for a period of 12 months once we have communicated to you our decision about whether to appoint you to the role or work. After this period, and if you are not successful in your application, we will securely destroy or anonymise your personal information in accordance with applicable laws and regulations. Otherwise we will retain your personal data for a period as determined by the appropriate regulatory authorities.

## Sharing your data with third parties

We have contracts with third-party service providers and suppliers to deliver certain services. Other than as set out in this Privacy Notice, we will not share your personal data with any third-parties.

We may contact the following parties in connection with our recruitment processes and, in order to obtain the information required from those parties, share your personal information:

- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant dispute resolution body or the courts;
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in our business;
- any recruitment consultant or agency with which you are engaged;
- any training, education or certification body from which we require verification of your attendance at, or certification from, such body (e.g., university); and
- the referees whose details you have provided to us for the purposes of obtaining a reference for your application.

On occasion, we may need to share your personal data to comply with the law.

## European Economic Area

If you live or work outside of the EEA, we may need to transfer your personal data outside of the EEA to correspond with you. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.



We may also transfer data outside of the EEA where our, service providers host, process, or store data outside the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union, or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with the Data Protection Law.

## Your rights

You have certain rights under the Data Protection Legislation that can be exercised by contacting our Data Protection Officer at [dpo@angloeastern.com](mailto:dpo@angloeastern.com), including:

- the right to access the personal data held about you by making a subject access request in accordance with the Data Protection Legislation (we may charge a reasonable fee when a request is manifestly unfounded or excessive);
- the right to have your personal data rectified if it is inaccurate or incomplete;
- the right to have your personal data deleted in certain specific circumstances as set out in the Data Protection Legislation;
- the right to request to restrict the processing of your personal data in certain specific circumstances as set out in the Data Protection Legislation;
- the right to ask us not to process your personal data for marketing purposes or for purposes based on our legitimate interests;
- the right to request the transfer of your personal data to another party in certain specific circumstances as set out in the Data Protection Legislation; and
- the right, where you have provided consent, to withdraw such consent at any time.

There are some exceptions to the above rights that are permitted under the Data Protection Legislation.

Please note that if you choose to exercise your rights to have your personal data restricted or deleted, then we may not be able to progress your application.