



## CANDIDATE PRIVACY NOTICE

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### **What is the purpose of this document?**

Idemitsu Petroleum Norge AS is a "data controller". This means that we are responsible for deciding the purposes of the processing of your personal data and the means utilised in such processing.

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) (hereinafter a "Candidate"). This policy serves to make you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, how long it will usually be retained for and the rights you have. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### **Data protection principles**

We will comply with data protection law and principles, which means that your personal 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 communicated to you.
- Kept securely.

### **The kind of personal data we hold about you**

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

- The personal data you have provided to us in your curriculum vitae and covering letter.
- The personal data you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, picture, gender, compliance documentation, employment history, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website, qualifications, skills and experience.

- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.
- Information about your current level of remuneration.
- Information about your entitlement to work in Norway.
- Any information you provide to us during an interview or other forms of assessment.

### **How is your personal data collected?**

We collect personal data about candidates from the following sources:

- You, the Candidate.
- Recruitment agencies.
- Your named referees.
- Your passport or other identity documents.

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

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the work or role.
- Carry out reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to process your personal data during the recruitment process and for keeping records of the process. Processing data from Candidates allows us to manage the recruitment process, assess and confirm a Candidate's suitability for employment and decide to whom to offer a job.

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

We may process special categories of data, such as personal data about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect personal data about whether or not applicants are disabled to make reasonable adjustments for Candidates who

have a disability. We process such personal data to carry out our obligations and exercise specific rights in relation to employment.

In certain instances, we might need to process your personal data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in Norway before employment commences.

Having received your CV and covering letter and/or your application form, we will then process that data 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.

### **How we try to ensure that your personal data is accurate**

Once your personal data has been submitted, we will discuss it with you via email or telephone when we discuss a position. Prior to making an introduction, we check that we have accurate personal data about you and we keep in touch with you, so you can let us know of changes to your personal data.

### **If you fail to provide personal data**

You are under no statutory or contractual obligation to provide personal data to us during the recruitment process. However, if you fail to provide personal data 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 references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **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 in our organisation has access to your personal data?**

Your personal data may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.



### **Why might you share my personal data with third parties?**

We will only share your personal data with such third parties as necessary 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 data 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.

We may be required to disclose certain personal data as required by law, to protect our legal rights to the extent authorised or permitted by law or in the event of an emergency where the health or safety of a Candidate or other individuals may be endangered.

In addition, in the event of a re-organisation, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business, we may transfer personal data to successor entities or parties.

### **Consent**

Should we want or need to rely on consent to process your personal data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

We do not need your consent if we use special categories of your personal data in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **International transfer**

Personal data will not be transferred anywhere outside of the EEA without first obtaining your consent.

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data 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.



### **How we will store your data**

Your personal data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **How long will you use my information for?**

We understand our legal duty to retain accurate personal data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention policy and procedures to remove personal data that we no longer have a legitimate business interest in maintaining.

We will retain your personal data for a period of 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal data 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 or once you withdraw your consent, we will securely destroy your personal data in accordance with our data retention policy.

If we wish to retain your personal data 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.

### **Your rights**

#### **Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data 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 data for direct marketing purposes.

- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the HR Manager in writing.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the HR Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Contact**

If you wish to exercise your rights or have any inquiries regarding this policy or the way we process your personal data, please contact us at [mail@idemitsu.no](mailto:mail@idemitsu.no).

If you believe that the organisation has not complied with your data protection rights, you can complain to the Norwegian Data Protection Authority at [www.datatilsynet.no](http://www.datatilsynet.no).