# FAIR PROCESSING NOTICE FOR JOB APPLICANTS

This fair processing notice (hereinafter "**Notice**") explains how and why Vitol uses and protects personal data about prospective employees (hereinafter "**you**").

This Notice applies to you if you are an applicant for a role or other engagement with a member of the Vitol Group located in the UK, European Union, or Switzerland and provides information about how Vitol collects and uses your personal data when applying for a role or engagement with us. When we refer to "**Vitol**", "**we**", "**our**" and "**us**", we are referring to the company in the Vitol Group that you are speaking to in relation to a potential role with Vitol. A list of the relevant Vitol controllers in each country is set out in Schedule 1. Please read this Notice and any other privacy notices that we provide to you carefully, so that you are aware of how and why we are using your Personal Data and what your rights are under data protection legislation.

## 1. Personal Data we collect and hold about you

We may collect information about you to enable us to carry out an effective and efficient recruitment process. It is your responsibility to make sure the Personal Data you provide to us is complete and accurate. If any of the Personal Data you have given to us changes, such as your contact details, please contact your local HR team.

### *A. How we collect Personal Data*

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your Personal Data by various means, including via Smart Recruiters, by post, phone, email or otherwise. This includes Personal Data you provide when you, apply for a role with us, give us feedback, or contact us in any other way.
- Personal Data is collected when you visit a Vitol site for any purposes as part of your application process.
- **Third parties or publicly available sources.** We will also receive Personal Data about you from various third parties and public sources including:
    - Previous employers and referees
    - Recruitment consultants/agencies
    - Criminal background and credit check agencies

### *B. What Personal Data we may collect and hold about you, why we do so, and how we use it*

a) **Contact Information**

- Name(s), address, email address, contact numbers

b) **Personal Information**

- Date of birth, gender, marital or relationship status, and any other details contained in your CV or application

c) **Identity and Background Information**

- Checks of the electoral roll, register of directorships and FSA register if applicable
- Details of education and qualifications (academic and professional) and results
- Career history, experience and skills
- Passport information
- Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)
- Curriculum Vitae (CV) or resume and professional profile
- Evaluative notes and decisions from job interviews
- Preferences relating to job location and salary

d) **Financial Information**

- Bank account details
- Salary, compensation and other remuneration information
- Governmental identification numbers including National insurance numbers

e) **Special Category Personal Data**

- Racial or ethnic origin (including your nationality and visa information)

g) **Employment Administration Information**

- Terms and conditions of employment
- Your working preferences and feedback in relation to Vitol and our staff
- Your preferences in relation to our use of your Personal Data

h) **Travel and Expenses Information**

- Visa, passport and insurance details
- Flight and accommodation booking information

**i) Biometric data, video and images**

- Biometric data from your passport
- Video and image data from CCTV we have in operation on our premises
- Any photos you provide with your CV (if applicable)

We are required by law to have a permitted reason or justification (called a "lawful basis") for processing your Personal Data. There are six such permitted lawful basis for processing Personal Data.

The table set out below summarises the Personal Data we collect about you, how we use it and our lawful bases for processing that data.

| **Purpose of processing** | **Lawful basis for processing** |
|---|---|
| Administering your application for a job with us and considering your suitability for the relevant role | Necessary for our legitimate interest to ensure recruitment of suitable employees. |
| Obtaining, considering and verifying your employment references and employment history | Necessary for our legitimate interest to ensure recruitment of suitable employees. |
| Reviewing and confirming your right to work in the country where you have applied | Necessary to comply with a legal obligation, particularly our legal responsibility to ensure that staff have a right to work in the country they have applied |
| Conducting verification, vetting, and criminal background checks where required by law (including in the Netherlands a certificate of good conduct: *verklaring omtrent gedrag) in order* to carry our statutory checks and ensure the suitability, integrity and reliability of candidates and to protect the company | It is necessary for us to comply with a legal obligation<br><br>OR It is in our legitimate interests, namely to ensure the suitability, integrity and reliability of candidates and to protect the company |
| Conducting background checks, verification and vetting which are not required by law but needed to assess your suitability for your role, including searches of the electoral roll, passport validation, checks on employment history, references and academic and professional qualifications and directorship searches | Where you have given your consent to the processing<br><br>OR It is in our legitimate interests, namely to ensure the suitability, integrity and reliability of candidates and to protect the company |
| Administering, and reviewing the results of, skill testing of job applicants | Necessary for our legitimate interest to ensure recruitment of suitable employees. |
| Making a job offer to you and entering into contract of employment with you | It is necessary to perform your employment contract |
| Developing, operating and collecting feedback on recruitment activities and employee selection processes | Legitimate interest – to enable Vitol to improve its ability to select the best candidates for positions within the business |
| Monitoring the security of Vitol's physical premises | Legitimate interests - to ensure the protection of Vitol's premises, business, assets, workers and the public and loss prevention. |
| Administering your travel and accommodation arrangements, and operating, reviewing and responding to CCTV surveillance of Vitol's premises, including monitoring footage if required | Necessary for our legitimate interest to ensure you can reach required locations as needed for interview purposes |

*Where we are relying on consent to process your Personal Data, you will have the right to withdraw your consent at any time in accordance with the "*Your rights in relation to Personal Data and how you can exercise them*" section below.

**2. Who we share your Personal Data with, and why**

*Inside the Vitol group*

We may need to share your Personal Data with other companies in the Vitol group for recruitment purposes. For example, your CV may be shared with HR staff in other offices and with management when relevant.

*Outside the Vitol group*

We may share Personal Data with third parties who perform certain business functions for us, such as:

- External contractors who conduct reference and background checks;
- External contractors who perform personality and psychometric tests as part of the recruitment process;
- Recruitment agencies;
- Service providers who provide IT support, communications services or administrative support or relocation services and bank institutions if applicable ;
- Our professional advisers (such as our legal advisers, our accountants, auditors and other professional advisers); and
- Regulatory authorities, courts, tribunals, government agencies or law enforcement agencies.

These third parties will process your Personal Data on our behalf (as our processor). Any third party with whom we share your Personal Data will have appropriate security standards in place to make sure your Personal Data is protected and we will enter into a written contract imposing appropriate security standards on them. We may also share your Personal Data with other third parties, as directed by you.

### 3. International Transfers of Personal Data

We may transfer your Personal Data outside the United Kingdom and the European Economic Area, including to other companies in the Vitol group, third-party service providers and partners, and we put adequate safeguards in place when we do so. When transferring Personal Data to countries that are not subject to an adequacy regulation or adequacy decision, we typically use standard contractual clauses approved by the applicable regulatory authority to ensure the ongoing protection of Personal Data.

### 4. Data retention

We only retain your Personal Data during and after your application and interview process for no longer than is necessary for the purposes for which the Personal Data is processed, or as otherwise required by applicable legal obligations.

We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. If we continue to retain your Personal Data in accordance with a legal obligation, any further processing of your data will be limited to compliance with such legal obligation.

If your application is unsuccessful, we will keep your Personal Data (including your CV) for a period of one year, following which time it will be deleted. If you would like us to delete your personal information after one year, please let us know.

If your application is successful, your Personal Data will be kept and transferred to the systems we administer for employees. We have a separate fair processing notice for employees, which will be provided to you.

### 5. Your rights in relation to your Personal Data and how you can exercise them

You have certain legal rights in relation to any Personal Data about you which we hold. These are detailed below. These rights are not absolute and are subject to certain limitations and qualifications. In certain cases we might ask for identity verification information so as to ensure that we are dealing with the correct person.

| Your right | What does it mean? | Other details |
|---|---|---|
| **Right to be informed** | You have the right to be provided with clear, transparent, and easily understandable information about how we use your Personal Data and your rights. Therefore, we are providing you with the information in this notice. | N/A |
| **Right of access** | You have the right to obtain access to your Personal Data (if we are processing it), and certain other supplementary information (like the information provided in this Notice). This is so you are aware and can check that we are using your Personal Data in accordance with data protection law. | If possible, we request that you specify the type of information you would like to see.<br><br>Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff. Other exemptions may apply dependent on the information and context. |
| **Right to data portability** | You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and to request that this data is transmitted to another controller where this is technically feasible. | If you exercise this right, we request that you specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.<br><br>This right only applies if the processing is based on your consent or for the performance of a contract with you and when the processing is carried out by automated means (i.e. not for paper |

| | | |
|---|---|---|
| | | records). It covers only the Personal Data that has been provided to us by yourself. |
| **Rights in relation to inaccurate personal or incomplete data** | You are entitled to have your Personal Data corrected if it is inaccurate or incomplete. | If possible, we encourage you to notify us of any changes regarding your Personal Data as soon as they occur, including changes to your contact details, telephone number, immigration status. Alternatively, you can make updates yourself using any available self-help tools.<br><br>This right only applies to your own Personal Data. When exercising this right, we recommend you be as specific as possible with your request, however, this will not impact your right to rectification. |
| **The right to restrict processing** | You have rights to 'block' or suppress further use of your Personal Data. When processing is restricted, we can still store your Personal Data, but may not use it further. | We keep lists of people who have asked for further use of their Personal Data to be 'blocked' to make sure the restriction is respected in future. |
| **The right to object** | You have the right to object to the use of your Personal Data where are processing your Personal Data to pursue our or a third party's legitimate interests, or as a basis for direct marketing. Where you object to us using your Personal Data for direct marketing purposes, we must stop. For objections related to processing for other purposes, we will need to stop using your Personal Data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or we need to use the Personal Data to establish, exercise or defend legal claims. | As stated above, this right applies where our processing of your Personal Data is necessary for our legitimate interests. You can also object to our processing of your Personal Data for direct marketing purposes. |
| **Right to erasure** | This is also known as 'the right to be forgotten' and, basically, enables you to request the deletion or removal of your Personal Data where there is no compelling reason for us to keep using it, e.g. where your Personal Data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful. | This is not a general right to erasure; there are exceptions. We may not be in a position to erase your Personal Data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims. |
| **The right not to be subject to a decision based solely on automated processing, including profiling** | You have the right not to have your Personal Data used to make solely automated decisions about you that have legal or similarly significant effects on you. For example, you have the right not to have your Personal Data used to create a profile of you that automated decisions are later based on without there being any human involvement in that processing. | N/A |
| **The right to withdraw consent at any time** | If you have given your consent to anything we do with your Personal Data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your Personal Data with your consent up to that point is unlawful) as per the "Consent" section below. This includes the right to withdraw consent to us using your Personal Data for marketing purposes. | If you withdraw your consent, this will only take effect for future processing. |

## 6. Contact Details

If you have any questions about this Notice, or about the use of your Personal Data or you wish to exercise any of the rights set out above, please contact the HR person dealing with your recruitment, or alternatively get in touch via the contact us page at https://www.vitol.com/contact/

**Data Protection Authorities**

You have the right to lodge a complaint about the way we handle or process your Personal Data with your relevant national data protection regulator. See details of applicable data protection regulators below.

| COUNTRY | REGULATOR | ADDRESS | WEBSITE |
|---|---|---|---|
| **Luxembourg** | National Commission for Data Protection | 15 Boulevard du Jazz<br>L-4370 Belvaux | https://cnpd.public.lu/en.html |
| **Poland** | Urzad Ochrony Danych Osobowych (UODO) | ul. Stawki 2, 00-193<br>Warszawa | https://uodo.gov.pl/en |
| **Romania** | The National Supervisory Authority for Personal Data Processing | 28-30 G-ral Gheorghe Magheru Bld.<br>District 1, post code 010336<br>Bucharest, Romania | https://www.dataprotection.ro/index.jsp?page=home&lang=en |
| **Spain** | Spanish Data Protection Authority (AEPD) | C/Jorge Juan, 6. 28001 – Madrid | https://www.aepd.es/en/areas/innovation-and-technology |
| **Switzerland** | Federal Data Protection and Information Commissioner | Federal Data Protection and Information Commissioner<br>Feldeggweg 1 CH - 3003 Bern | https://www.edoeb.admin.ch/edoeb/en/home.html |
| **The Netherlands** | Dutch Data Protection Authority (DPA) | Hoge Nieuwstraat 8<br>2514 EL The Hague | https://www.autoriteitpersoonsgegevens.nl/en |
| **UK** | Information Commissioners Office (ICO) | Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF | https://ico.org.uk. |

**SCHEDULE 1 – VITOL CONTROLLER ENTITIES**

If you would like to get in touch with any of the controller entities listed below, please email GDPR@Vitol.com

| COUNTRY | CONTROLLER |
|---|---|
| **Luxembourg** | Vitol Holding II SA |
| **Poland** | Venor Polska Sp. z o.o.<br>Vortex Energy Polska Sp. Z O.O |
| **Romania** | Vitaro Energy S.R.L |
| **Spain** | Vitol Services Iberia, S.L.U. |
| **Switzerland** | Vitol SA<br>Vitol Holding SARL |
| **The Netherlands** | Vitol BV<br>Vitol Holding BV<br>VPR Energy BV<br>Vitol Services BV<br>Vitol Gas and Power BV<br>Martank B.V.<br>Vitol Netherlands B.V.<br>Vitol SA Rotterdam Branch<br>Vitol Netherlands Coöperatief U.A.<br>Vitol International Shipping (NL) Services BV |
| **United Kingdom** | Vitol Services Limited<br>Vitol Broking Limited<br>VEV Services Limited<br>Vitol International Shipping (UK) Services Limited |