



**A world of
new energy**

ENERGY DEVELOPMENTS (UK) LTD

CONTRACTOR PERSONNEL PRIVACY NOTICE

(Issued February 2025)

1. Energy Developments (UK) Limited (“EDL”) CONTRACTOR PERSONNEL PRIVACY NOTICE

EDL (“we”, “our” or “us”) is committed to protecting and respecting your privacy. You are being sent a copy of this privacy notice because you are employed or engaged by one of our suppliers or contractors (“suppliers”) which provides or may provide services to us. We collect certain personal information from personnel of our suppliers that provide or may provide services to us. This notice sets out the basis on which we process your personal information as part of this process.

EDL’s parent company, Energy Developments Pty Limited is an Australian based entity and our core administrative functions and technology platforms are centralised there. To process and store your personal information to comply with our internal onboarding procedures, certain personal information may be transferred to our Head Office in Australia.

1.1 Controller of your personal data

For the purposes of this privacy notice, the controller of your personal data is Energy Developments (UK) Limited a company incorporated in England and Wales with company number 03178463 and with registered office at 2nd Floor, Rickyard Barn, Pury Hill Business Park Alderton Road, Paulerspury, Towcester, England, NN12 7LS.

1.2 What personal information do we collect and when do we collect it?

Identifying details – we collect information to identify you including your name and contact details.

Training – we keep a record of any training which you complete whilst working for EDL and any previous or other training which is relevant to your competency or ability to undertake work for EDL.

Compliance documentation – we keep a record or a copy of any licences or certifications which are required for the type of work you undertake for EDL – for example, working at a height documentation.

1.3 Why might you share my personal information with third parties?

We may share your personal information with Energy Developments Pty Limited, our group company in Australia.

We also use the services of third party information technology service providers that provide systems that host or allow us to process and administrate personal data, including the personal information of contractor personnel. These systems may be located in the UK or in a third country which may not offer the same level of protection for personal data as UK laws provide. In such instances, we implement appropriate safeguards for your personal information which are required under data protection laws and review the circumstances of the processing of your personal data so that your personal information is appropriately protected. Pursuant to such arrangements, certain systems used by us are hosted in Australia (where data is also stored) and accessed by personnel located in the UK.

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.

2. WHY IS THIS INFORMATION COLLECTED?

2.1 We process your personal information for a range of purposes relating to supplier management and our own internal compliance policies and procedures. In addition to the information set out above, in the table below, we set out in the left-hand column the purposes for which we use the personal information which we collect about personnel of our suppliers. We additionally identify the corresponding legal basis which we rely upon in the right hand column.

If we require your consent to process your personal information, we will notify you separately in a request for your consent which details the purpose(s) for which the relevant personal information will be used.

Purpose	Legal Basis
To communicate with you.	This is in our legitimate interests to enable us to undertake recruitment activities.
To assess your training record.	<p>This is in our legitimate interests to enable us to manage our suppliers appropriately.</p> <p>In some contexts, we also have a legal obligation to take steps to assess whether you have undertaken mandatory training before undertaking certain activities, such as working at a height.</p>
To keep a record of your training and any necessary licences or certifications.	<p>This is in our legitimate interests to enable us to manage our suppliers appropriately.</p> <p>This is also undertaken to assist us to comply with our legal obligations regarding having a safe working environment.</p>
Records and data management.	This is in our legitimate interest to enable us to administrate our business.
Other processing required from time to time to comply with any applicable legal or regulatory obligations (including in connection with a court order).	We do this for compliance with legal obligations to which we are subject.

2.2 Special category (sensitive) data

We may process information relating to your health if necessary to assess your fitness or suitability to undertake relevant work, or due to an incident whilst you are working for us, or if this is otherwise necessary for the role which you undertake. This information is processed for the purposes set out above, including to assess your fitness to work in a safety critical role, as applicable. More particularly this information is necessary to assess your suitability for a role which involves the provision of working at our power generation sites where health and safety considerations are of paramount importance. These types of processing of your personal information are necessary for us to provide a safe working environment.

There may be other instances where we process sensitive personal data, however, we will obtain your consent prior to processing such information unless this is not required by law.

3. YOUR RIGHTS

3.1 You are granted various rights under data protection laws, which we summarise below:

- right to access personal information – you have a right to obtain confirmation of whether we are processing your personal information, access to your personal information and information regarding how your personal information is being used by us;
- right to have inaccurate personal information rectified – you have a right to have any inaccurate or incomplete personal information rectified. If we have disclosed the relevant personal information to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible;
- right to have personal information erased in certain circumstances – you have a right to request that certain personal information held by us is erased. This is also known as the right to be forgotten. This is not a blanket right to require all personal information to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your personal information.
- right to restrict processing of personal information in certain circumstances – you have a right to block the processing of your personal information in certain circumstances. This right arises if you are disputing the accuracy of personal information, if you have raised an objection to processing, if processing of personal information is unlawful and you oppose erasure and request restriction instead or if the personal information is no longer required by us but you require the personal information to be retained to establish, exercise or defend a legal claim;

- right to data portability – in certain circumstances you can request to receive a copy of your personal information in a commonly used electronic format. This right only applies to personal information that you have provided to us (for example by completing a form or providing information through a website). Information about you which has been gathered by monitoring your behaviour will also be subject to the right to data portability. The right to data portability only applies if the processing is based on your consent or if the personal information must be processed for the performance of a contract and the processing is carried out by automated means (i.e., electronically);
- right to object to processing of personal information in certain circumstances, including where personal information is used for marketing purposes – you have a right to object to processing being carried out by us if (a) we are processing personal information based on legitimate interests or for the performance of a task in the public interest (including profiling), (b) if we are using personal information for direct marketing purposes, or (c) if information is being processed for scientific or historical research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly brought to your attention and be presented clearly and separately from any other information; and
- right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect – you have a right not to be subject to a decision which is based on automated processing where the decision will produce a legal effect or a similarly significant effect on you.

You may exercise any of your rights at any time by contacting us using the contact details set out below. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. You also have the right to lodge a complaint about how your data is processed with the Information Commissioner's Office. We would be grateful if you would raise any issue which you have with us in the first instance (see contact details below) so that we may assist you.

4. DATA RETENTION

4.1 How long will you use my information for?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for an extended period in the event of a complaint or workplace investigation or potential or actual litigation relevant to you or your personal information.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

As a general comment, absent the situations noted above or other extenuating circumstances, we retain health and safety records (including assessments) and personal records of individual personnel of our suppliers for 7 years after the completion of the relevant services to which personal information relates.

5. CHANGES TO THIS NOTICE

5.1 Any changes we may make to this notice in the future will be notified to you.

6. CONTACT US

6.1 Questions, comments and requests regarding this notice or the information that we collect from you are welcomed and should be addressed to our HR Department UK by email to GDPR.UK@edlenergy.com.