

# Fair Processing Notice for job applicants

Reference: Vitol

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## Fair Processing Notice for job applicants

In accordance with the General Data Protection Regulation, this notice explains how and why Vitol uses 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<sup>(1)</sup> located in the European Union. 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 Vitol controllers likely to be relevant to you 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.

### What types of personal data do we collect and where do we get it from

We collect many different types of personal data about you for lots of reasons to enable us to carry out an effective and efficient recruitment process. This includes your CV, personal contact details, information regarding your education and employment history and references from former employers. We typically collect personal data through the application and recruitment process, either directly from you or from previous employers, recruitment consultants and agencies. Additionally, we may collect such personal data from online resources and background check providers, including credit checks and the directorship register.

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.

Full details of the types of personal data we may collect and where we get it from can be found here:

Type of personal data	Collected from
<b>a) Contact Information</b>	
• Name(s), address, email address, contact numbers	• You
<b>b) Personal Information</b>	
• Date of birth, gender, marital or relationship status, and any other details contained in your CV or application	• You
<b>c) Identity and Background Information</b>	
• Checks of the electoral roll, register of directorships and FSA register	• You
• Details of education and qualifications (academic and professional) and results	• Recruitment consultants and agencies
• Career history, experience and skills	• Your previous employers
• Passport information	• Publicly available information from online resources
• Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)	
• Curriculum Vitae (CV) or resume and professional profile	
• Application form	
• Evaluative notes and decisions from job interviews	
• Preferences relating to job location and salary	
<b>d) Financial Information</b>	
• Bank account details	• You
• Salary, compensation and other remuneration information	• Your previous employer
• National insurance number and/or other governmental identification numbers	
<b>e) Special Category Personal Data</b>	
• Racial or ethnic origin (including your nationality and visa information)	• You
<b>f) Employment Administration Information</b>	
• Terms and conditions of employment	• You
• Your working preferences and feedback in relation to Vitol and our staff	
• Your preferences in relation to our use of your personal data	
<b>g) Travel and Expenses Information</b>	
• Visa, passport and insurance details	• You
• Flight and accommodation booking information	
• Travel itinerary information	

<sup>(1)</sup> The terms “Vitol”, “Vitol Group”, “the Company,” or “the Group” may be used for convenience and refer to Vitol Netherlands Coöperatief U.A. and its direct and indirect subsidiaries and affiliates, each of which are separate and distinct legal entities.

Type of personal data	Collected from
<b>h) Security, Location and Access Information</b> <ul style="list-style-type: none"> <li>Information (including image) captured or recorded by electronic card access systems, CCTV and other security control systems</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>

**What do we do with your personal data, and why**

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, including to comply with legal obligations that we are subject to and or if it is necessary for our legitimate interests or the interests of a third party.

We may also convert your personal data into statistical or aggregated form, or de-identify it, to better protect your privacy.

Full details about what we process your data for, and the lawful bases on which we rely for such processing, can be found here:

Purpose of Processing	Lawful basis
1. Administering your application for a job with us and considering your suitability for the relevant role	Legitimate interest – to enable Vitol to recruit suitable employees
2. Obtaining, considering and verifying your employment references and employment history	Legitimate interest – to enable Vitol to recruit suitable employees
3. Reviewing and confirming your right to work in the country where you have applied	It is necessary for us to comply with a legal obligation
4. Conducting verification and vetting, including criminal background checks and credit checks where required by law (including in the Netherlands a certificate of good conduct: <i>verklaring omtrent gedrag</i> )	It is necessary for us to comply with a legal obligation or it is in our legitimate interests, namely to ensure the suitability, integrity and reliability of candidates and to protect the company
5. 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	You have given your consent to the processing or it is necessary to perform a task in the public interest
6. Administering, and reviewing the results of, skill testing of job applicants	Legitimate interest – to enable Vitol to recruit suitable employees
7. Making a job offer to you and entering into contract of employment with you	It is necessary to perform your employment contract
8. 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
9. Monitoring the security of Vitol’s physical premises	It is necessary for us to comply with a legal obligation and for our legitimate interests
10. Administering your travel and accommodation arrangements	To ensure you can reach required locations as needed for interview purposes
11. Operating, reviewing and responding to CCTV surveillance of Vitol’s premises, including monitoring footage if required	Legitimate interest – protection of Vitol’s premises, business, assets, workers and the public and loss prevention

**Special category personal data (including criminal data)**

We are required to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and include information relating to your health.

Purpose of Processing	Special category lawful basis
1. Conducting verification and vetting, including criminal background checks and credit checks where required by law (including in the Netherlands a certificate of good conduct: <i>verklaring omtrent gedrag</i> )	It is necessary for us to comply with a legal obligation or it is in our legitimate interests, namely to ensure the suitability, integrity and reliability of candidates and to protect the company

Purpose of Processing	Special category lawful basis
2. Conducting background checks, verification and vetting which are not required by law but needed by us 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)	You have given your explicit consent to the processing or it is necessary for reasons of substantial public interest

## Who do 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 and management when relevant.

### *Outside the Vitol group*

We may share personal data with third parties who perform certain business functions for us, such as conduct reference and background checks, or personality and psychometric tests as part of the recruitment process. 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.

## International Transfers of personal data

As a global organisation, your personal information may be transferred to Vitol Group entities and trusted third parties in countries outside the European Economic Area. We will only make that transfer if:

- the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- you explicitly consent to the transfer

## Security measures and data retention

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

We will only keep your personal data for a limited period of time. If your application is unsuccessful, we will keep your personal data for a period of six months, following which time only your name, details of the role you applied for and feedback will be retained for a further three years. If your application is unsuccessful but we consider that you may be suitable for other roles in the future, we will keep your personal data for a period of one year, following which time your name, details of the role you applied for, feedback and your contact details will be retained for a further three years.

If you would like us to delete your personal information in advance of the timeframe detailed above, 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.

### 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.

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. 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.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should 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. This right only applies if the processing is based on your consent or on our 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 you.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. 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.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	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.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	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.
<b>Right to withdrawal of consent</b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.



Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

If you wish to exercise any of your rights please contact the HR person dealing with your recruitment.

If you are based in the EU, you also have the right to lodge a complaint with your local data protection regulator.

### **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, please speak to the HR person who dealt with your recruitment or contact us on [GDPR@vitol.com](mailto:GDPR@vitol.com).

### **APPENDIX 1 – Vitol Controller entities**

Vitol entities:

Vitol Services Limited  
Vitol Broking Limited  
Vitol BV  
Vitol Holding BV  
Vitol Insurance BV  
VPR Energy BV  
Vitol Baltics SIA  
Vitol Holding II SA  
Vitol Services BV  
Vitol Netherlands BV  
Vitol Netherlands Coöperatief U.A.  
Vitol SA – Rotterdam Branch