

# PRIVACY NOTICE

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## Table of Contents

|          |                                                             |           |
|----------|-------------------------------------------------------------|-----------|
| <b>1</b> | <b>General .....</b>                                        | <b>3</b>  |
| 1.1      | Deena Energy Information .....                              | 3         |
| 1.2      | Legislation .....                                           | 3         |
| 1.3      | Queries and Complaints.....                                 | 3         |
| 1.4      | Breaches.....                                               | 4         |
| <b>2</b> | <b>How Does Deena Energy Collect Information? .....</b>     | <b>4</b>  |
| <b>3</b> | <b>What Does Deena Energy Use Information For? .....</b>    | <b>5</b>  |
| 3.1      | Process, Purpose, and Lawful Basis .....                    | 5         |
| <b>4</b> | <b>Who Does Deena Energy Share Information With? .....</b>  | <b>9</b>  |
| 4.1      | Other Third Parties.....                                    | 9         |
| 4.2      | Government Departments, Bodies or Agencies .....            | 9         |
| 4.3      | International Transfers .....                               | 9         |
| <b>5</b> | <b>What Type of Information is Collected?.....</b>          | <b>10</b> |
| <b>6</b> | <b>How Long Does Deena Energy Retain Information? .....</b> | <b>11</b> |
| <b>7</b> | <b>What Are Your Rights?.....</b>                           | <b>11</b> |
| 7.1      | Where do I send requests? .....                             | 11        |
| 7.2      | How long will a request take?.....                          | 11        |
| 7.3      | Right of Access .....                                       | 12        |
| 7.4      | Right to Rectification.....                                 | 12        |
| 7.5      | Right to be Forgotten.....                                  | 12        |
| 7.6      | Right to Restriction .....                                  | 13        |
| 7.7      | Right to Data Portability.....                              | 14        |
| 7.8      | Right to Object .....                                       | 14        |

## 1 General

Deena Energy Services ('Deena Energy') is committed to protecting all personal and special categories of data held on you.

As such, Deena Energy wants you, the 'data subject', to understand how Deena Energy collects, uses, stores, and shares your personal data. Deena Energy also wants you understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Deena Energy uses your personal data. Please note Deena Energy reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Deena Energy's website through the following link: <https://www.deenaenergy.com/privacy-notice/>

### 1.1 Deena Energy Information

Deena Energy specialises in the recruitment of personnel to the Power Generation, Oil & Gas and Renewables industries. Deena Energy is a subsidiary of the Cpl Group. If you wish to locate further information on Deena Energy, you can find this on the Deena Energy website through the following link: <https://www.deenaenergy.com/about-us/>

### 1.2 Legislation

All personal data processed by Deena Energy is done so in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

### 1.3 Queries and Complaints

If you are unhappy with the way Deena Energy handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Deena Energy at the below:

**Data Protection Officer**

**Deena Energy Services**

1-2 High Street,

Balbriggan

Co. Dublin, K32 DD40

Ireland

Telephone: +353 1 8410470

Email: [dataprivacy@cpl.com](mailto:dataprivacy@cpl.com)

You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

**Data Protection Commission**

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Telephone: +353 (0)761 104 800

Telephone: +353 (0)57 868 4800

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

#### 1.4 Breaches

Deena Energy will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Deena Energy will contact you in line with Deena Energy's legal obligations.

## 2 How Does Deena Energy Collect Information?

Deena Energy collects personal data to enable the provision of services to support Deena Energy's purpose. The following non-exhaustive methods of data collection are an indication of ways in which Deena Energy may obtain your information:

- Obtain personal data directly from you;
- Personal data that Deena Energy receives from other sources; and
- When entering Deena Energy's premises, you will be recorded on CCTV surveillance for security purposes.

It is important that the personal data you provide Deena Energy is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Deena Energy holds on you is inaccurate or incomplete, please contact Deena Energy and Deena Energy will update the information.

### 3 What Does Deena Energy Use Information For?

#### 3.1 Process, Purpose, and Lawful Basis

Deena Energy uses personal data collected to fulfil Deena Energy’s obligations to provide Training & Consultancy services and to enable the provision of services to support Deena Energy’s purpose.

Deena Energy uses personal data for any of the following purposes:

| Process                          | Purpose                                                                            | Lawful Basis                                                                                                                                                                                                                               |
|----------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Pre-Recruitment</b>           | To register a prospective data subject’s interest in recruitment for employment.   | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.<br><br>The processing is necessary for the exercise of rights and obligations under employment law.                   |
| <b>Recruitment and Selection</b> | To complete the recruitment process and assess data subject suitability.           | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.<br><br>Processing relates to Deena Energy’s obligations in employment and for assessing data subject’s work capacity. |
| <b>Pension</b>                   | To administer data subjects pension entitlements and to comply with pension rules. | To comply with various pension laws.<br><br>Processing is necessary for the performance of a contract to which the data subject is party.                                                                                                  |
| <b>Payroll</b>                   | To enable Deena Energy to effect payment to its data subjects.                     | Processing is necessary for the performance of a contract to which the data subject is party.                                                                                                                                              |

|                                           |                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                     |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Personnel File</b></p>              | <p>To comply with employment and revenue laws and to ensure that terms and conditions of employment are adhered to.</p>                                                                                                                   | <p>Processing is necessary for the performance of a contract to which the data subject is party.</p> <p>To comply with various employment and revenue laws.</p> <p>To protect the vital interests of the data subject in the event of an accident or emergency.</p> |
| <p><b>Entitlement to Work</b></p>         | <p>To enable Deena Energy to achieve compliance with its obligations pursuant to any local legislation governing the entitlement to work.</p>                                                                                             | <p>Processing is necessary for compliance with a legal obligation to which Deena Energy is subject.</p>                                                                                                                                                             |
| <p><b>Time and Attendance Records</b></p> | <p>To enable the data subject to avail of their rights and entitlement pursuant to the Organisation of Working Time Act 1997.</p>                                                                                                         | <p>The processing is necessary for the performance of contract to which the data subject is party.</p>                                                                                                                                                              |
| <p><b>Statutory Entitlement</b></p>       | <p>To enable Deena Energy to achieve compliance with:</p> <ul style="list-style-type: none"> <li>• Its obligation to the data subject;</li> <li>• Record keeping obligations pursuant to a variety of employment law statutes.</li> </ul> | <p>The processing is necessary for compliance with legal obligation to which Deena Energy is subject.</p>                                                                                                                                                           |
| <p><b>Training Records</b></p>            | <p>To ensure that Deena Energy is in a position to assess the data subject's training needs and to capture proof of training.</p>                                                                                                         | <p>The processing is necessary for the performance of contract to which the data subject is party.</p>                                                                                                                                                              |
| <p><b>Performance Details</b></p>         | <p>To manage the data subject's performance in accordance with relevant Deena Energy policies.</p>                                                                                                                                        | <p>The processing is necessary for the performance of contract to which the data subject is party.</p>                                                                                                                                                              |

|                                            |                                                                                                                                                                                                          |                                                                                                                                                                                                                          |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Grievance and Disciplinary</b></p>   | <p>To ensure the data subject's complaints are fairly investigated in accordance with Deena Energy policies.</p>                                                                                         | <p>To comply with Deena Energy legal obligation to apply fair procedures to any data subject's investigation.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p> |
| <p><b>Medical Information</b></p>          | <p>To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects.</p>                                      | <p>Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject.</p> <p>To carry out obligations and exercise rights under employment law.</p>                        |
| <p><b>Making or Receiving Payments</b></p> | <p>To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.</p>                                                | <p>Processing is necessary for compliance with various employment and revenue laws.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>                           |
| <p><b>Attracting Talent</b></p>            | <p>To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which Deena Energy obtain personal data.</p>           | <p>Processing is based on legitimate interest.</p>                                                                                                                                                                       |
| <p><b>Supporting Talent</b></p>            | <p>To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification.</p> | <p>Processing is based on legitimate interests and contractual obligations.</p>                                                                                                                                          |

|                                                              |                                                                                                                                                  |                                                                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Regulatory Compliance</b>                                 | <p>To comply with financial regulations and any other relevant laws and regulations.</p>                                                         | <p>Processing is necessary for compliance with a legal obligation to which Deena Energy is subject.</p> <p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> |
| <b>Third Party Data Sharing</b>                              | <p>To allow Deena Energy to conduct and carry out functions with third party service providers that enable Deena Energy to deliver services.</p> | <p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>                                                                                                         |
| <b>Back-ups</b>                                              | <p>To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.</p>                          | <p>Processing is necessary for compliance with a legal obligation to which Deena Energy is subject.</p>                                                                                                                                                                                                     |
| <b>Evidence Submissions</b>                                  | <p>To gather information for dispute resolution services and legal proceedings.</p>                                                              | <p>Processing is necessary for compliance with a legal obligation to which Deena Energy is subject.</p>                                                                                                                                                                                                     |
| <b>Transfer of Information for Parties Legal Proceedings</b> | <p>To allow parties to commence legal proceedings.</p>                                                                                           | <p>Processing is necessary for compliance with a legal obligation to which Deena Energy is subject.</p>                                                                                                                                                                                                     |
| <b>CCTV systems</b>                                          | <p>For the security, health, and safety of individuals on Deena Energy premises.</p>                                                             | <p>Processing is based on legitimate interest and is necessary for compliance with a legal obligation to which the Deena Energy is subject.</p>                                                                                                                                                             |
| <b>Accidents and Incidents</b>                               | <p>To enable Deena Energy to comply with data subject record keeping obligation</p>                                                              | <p>Processing is necessary for compliance with a legal obligation to which Deena Energy is subject.</p>                                                                                                                                                                                                     |



|  |                                                       |  |
|--|-------------------------------------------------------|--|
|  | pursuant to the Safety, Health, and Welfare Act 2005. |  |
|--|-------------------------------------------------------|--|

## 4 Who Does Deena Energy Share Information With?

Deena Energy may share personal data with other parties in the course of Deena Energy’s duties. When this is done, Deena Energy adheres to the following principles:

- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, Deena Energy ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where Deena Energy engages a third party to provide a service to Deena Energy, Deena Energy ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.
- Deena Energy, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.

While the parties Deena Energy engage may change occasionally, Deena Energy believe it is important you are aware of the types of parties Deena Energy shares data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Deena Energy shares data with.

### 4.1 Other Third Parties

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve Deena Energy’s processes and services (such as consultants).

### 4.2 Government Departments, Bodies or Agencies

Deena Energy is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments, agencies, bodies, investigatory bodies and local authorities.

### 4.3 International Transfers

Where personal data is transferred outside the European Economic Area, Deena Energy use safeguards known as Standard Contractual Clauses (SCCs).

## 5 What Type of Information is Collected?

To fulfil Deena Energy’s mandate and perform tasks as outlined in this statement, Deena Energy needs to collect various types of personal data.

While the type of personal data may change occasionally, Deena Energy believes it is important you are aware of the types of data Deena Energy gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data Deena Energy uses to perform Deena Energy’s tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

| Category   | Type of Data                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Candidates | <ul style="list-style-type: none"> <li>• First name, last name, address, phone numbers, skype details, email address, CV, previous job title and job descriptions, salary, terms and conditions of employment, employment history, references from former employers, education and training certification details, trainings completed, details of formal and informal proceedings such as letters, disciplinary and grievance proceedings, annual leave records, appraisal and performance information, interview notes and interview feedback.</li> <li>• Special data such as nationality card.</li> </ul>                                                                                                                                                                                                                     |
| Employees  | <ul style="list-style-type: none"> <li>• First name, last name, address, mothers name, fathers name, date and place of birth, next of kin details, contract of employment, annual leave details, salary arrangements, pension rates and schemes, marital status, bank account details, expense claims, CCTV images, grievance and disciplinary documents such as witness statements, workplace investigations, employee complaints, investigation meeting notes and witness statements, performance details such as probation forms, performance review forms, notes of performance review meetings and performance improvement plan documentation and training records.</li> <li>• Special data such as nationality, medical information for travel and fitness to work requirements - blood type, allergies, fitness</li> </ul> |

|                    |                                                                                                                                                                                                                                                                                      |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | to work medical reports, current medical conditions, incident reports that include incident or accident details captured on the individual, physical health data and data regarding risk situations and risk behaviours, social security number, bank account details and tax codes. |
| Other Stakeholders | <ul style="list-style-type: none"> <li>Contact details, proof of address, company registration documents, invoices, tax details and bank statements, tax reference number, bank details such as BIC, IBAN and invoice payments.</li> </ul>                                           |

## 6 How Long Does Deena Energy Retain Information?

Deena Energy has developed a record retention schedule for all the personal data Deena Energy holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at [dataprivacy@cpl.com](mailto:dataprivacy@cpl.com)

## 7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section 7. **However, restrictions may apply in certain situations.**

### 7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Deena Energy to deal with your request efficiently. To answer your request, Deena Energy may ask you to provide identification for verification purposes.

### 7.2 How long will a request take?

Upon receipt of a request, Deena Energy will have 30 days to provide an answer with an extension of two further months if required. If Deena Energy requires more time to deal with your request, Deena Energy will notify you of the delay and the reasons behind it within 30

days of the receipt of the request. If Deena Energy refuses your request, Deena Energy will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

Deena Energy will not charge a fee for any requests, provided Deena Energy does not consider them to be unjustified or excessive. If Deena Energy considers these to be unjustified or excessive, Deena Energy may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if Deena Energy refuses your request.

### 7.3 Right of Access

You have a right to know what personal data Deena Energy hold on you, why Deena Energy holds the data, and how Deena Energy is processing your personal data.

When submitting your request, please provide Deena Energy with information to help verify your identity and as much detail as possible to help Deena Energy understand the information you wish to access (i.e. date range, subject of the request) and email [dataprivacy@cpl.com](mailto:dataprivacy@cpl.com)

Please note that an access request is free of charge, however, where Deena Energy determines a request to be unjustified or excessive, Deena Energy may charge you a reasonable fee.

### 7.4 Right to Rectification

You have a right to request that Deena Energy information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Deena Energy encourage you to contact Deena Energy to have this information rectified. Upon receipt of request, Deena Energy will ensure that the personal data is rectified and as up to date as is reasonably possible.

### 7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;
- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Deena Energy will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Deena Energy's processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Deena Energy will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if Deena Energy is unable to fulfil your request.

Please be aware that in some circumstances Deena Energy may need to retain some information to ensure all your preferences are properly respected. For example, Deena Energy cannot erase all information about you where you have also asked Deena Energy not to send you marketing material. Otherwise, Deena Energy would delete your preference not to receive marketing material.

## 7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Deena Energy in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Deena Energy updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;
- Where the personal data is no longer required by Deena Energy, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

Deena Energy will contact you confirm where the request for restriction is fulfilled and will only lift the restriction after Deena Energy has informed you that Deena Energy is doing so.

### 7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis a contract;
- Processing is completed based on consent by the you;
- Processing is carried out by automated means.

You may also request that Deena Energy sends this personal data to another data controller where technically feasible.

### 7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Deena Energy.

If you wish to object to the processing of data, please contact Deena Energy with your request. Deena Energy will then stop the processing of personal data unless it is required for legal proceedings.