# PRIVACY POLICY FOR APPLICANT DATA

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## 1. PURPOSE

Calor is the controller for the processing of Applicant's personal data. In this policy we describe who we are, how and for which purposes we process Applicant's personal data and all other information that may be relevant to you. In case you have any additional questions, you can contact us via the contact details provided at the bottom of this policy.

This policy may change over time and the most up-to-date version can be accessed on Calor's careers webpage, by emailing privacyofficer@calor.co.uk or can be found on the Policy House on CALi. If significant changes are being made during your application process, we will inform you.

## 2. SCOPE

This Privacy policy is applicable to the processing by Calor Gas Limited (registered company no. 00303703), whose registered office is at Second Floor, Point 3, Haywood Road, Warwick, Warwickshire, CV34 5AH (hereafter referred to as "Calor", we or us) of all personal data of individuals in the field of recruitment ("Applicants"). In this policy, Applicants covers all potential or future workers at all levels and grades whether permanent, fixed term or temporary; including executives, senior managers, officers, directors (including non-executive directors) and members of the supervisory board or similar body), independent contractors, consultants, trainees, seconded staff, agents, casual workers, agency workers) with Calor or any of its subsidiaries, wherever located (including home-based and off-site workers).

## 3. FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We collect and process personal data of Applicants for the purposes of the recruitment and selection procedure and to ensure its efficient and effective functioning. The processing will fall under one (or more) of the following purposes:

**A. To communicate with you regarding your employment or job application**

If you have shown interest in a position within Calor, we store your personal data in our relevant recruitment systems. We use the data in our systems to communicate with you and to determine whether your qualifications and profile meet the requirements of a specific vacancy.

For this purpose:

- we process your personal data on the basis of your consent when you provide us with your personal data;
- we process your name, contact details, recruitment information (such as your CV, employment history, education history etc.), qualifications and training and correspondence with us concerning job applications.

**B. To answer your questions**

If you get in touch with us, we will use your personal data in order to reply to and answer your question(s).

For this purpose:

- we process your personal data on the basis of your consent when you provide us with your personal data; and
- we process your name, contact details, your correspondence with us with regard to your question(s) and all other personal data as may be necessary to answer your question(s).

**C. To assess and evaluate you during the recruitment procedure**

During the recruitment procedure, application screening (for example, in the form of a CV/skills assessment) may be part of the procedure. Depending on the role for which we are recruiting, a variety of further assessment processes may also be involved (for example, interview, presentation, group exercise, aptitude/personality assessments, written assessments etc). We may take steps to validate your achievements and experience with appropriate third parties to ensure that they are valid and correct.

For this purpose:

- we process your personal data on the basis of our legitimate interest that overrides your interests. It is in our interest to select applicants whose qualifications and profile meet the requirements of a specific vacancy with Calor;
- we process your application/CV which may include your skills, experience, knowledge and attributes, references and qualifications. This is based on the information you provide to us such as your employment history, education history, extra-circular activities etc.; and
- we process assessment information collected from and about you in relation to the specific requirements of the role for which we are recruiting. This includes assessment results, scoring, and evidence-based notes.

**D. To enter into an employment contract with you**

If we offer you a position at Calor, we will process your personal data to prepare and process an employment agreement. We use your personal data for the conclusion, execution and termination of your employment agreement. We also use your personal data for the conclusion, execution and termination of associated benefits within Calor. We will then also store your personal data in our HR systems. We screen and monitor our colleagues both before and while they work at Calor and authenticate colleague status and access rights.

For this purpose:

- we process your personal data including your name, contact details (phone number, email and postal address), date of birth, eligibility to work in the UK (including but not limited to driving licence or ID card, work permit/Visa details, passport details, birth certificate and/or National Insurance number and proof of address documents), VAT details, tax details, national insurance details and payment details (banking information etc.). This is a legal obligation because this information is required in order for us to enter into an employment contract with you.
- we process recruitment information including information such as your employment history, education history, qualifications/training details, extra-curricular activities, your location, current or previous job and position data, your availability, current or previous terms of employment, and declaration of employment status etc. This is of legitimate interest to us and/or a for a recognised legitimate interest in order to select

applicants whose qualifications and profile meet the requirements of a specific vacancy with Calor and to complete the required referencing and vetting processes specific to the role type you are offered with Calor. Where we process your personal data to conduct vetting, we or our service providers will comply with the requirements set out by the Disclosure and Barring Service, including asking for informed consent.

- we process your personal data including age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation should you chose to share this with us. This is to comply with our legal obligations (where we are required to report on to comply with ethnicity, disability and gender pay gap reporting obligations) or for our legitimate interests in order to otherwise monitor and report on equality, diversity and inclusion.
- We process your personal data including information such as dependent(s)' names and dates of birth, vehicle information, next of kin or nominated person(s)' names, dates of birth and addresses etc., should you choose to share this with us. This is of legitimate interest to us in order for us to process your wish to receive the contractual benefits on offer to you.

**E. Social networks, such as LinkedIn, and other publicly available websites**

We may collect your personal data from public profiles such as LinkedIn or other social networks and other publicly available websites if you reacted to Calor's recruitment initiatives on such social networks and websites, or signed up to such social networks, recruitment websites or our own websites. We also may collect your personal data from such sources when you provided a link to your profile on any such site as part of your job application or curriculum vitae submitted with your job application.

We may also obtain your contact details from publicly available sources, including content that you have made public on LinkedIn or other social network sites or similar sites for professional purposes to make an initial contact with you for recruitment purposes. We will contact you if you have made your contact details available to Calor to contact you for recruitment purposes and will provide you with a clear option to ask us to stop contacting you for career opportunities and remove your personal data from our systems.

We may also communicate with you on social media or via communication apps such as WhatsApp if you are connected to us, if you use social media or a communication app or if you post a photo or video linked to Calor or our products.

For this purpose:

- we process your personal data based for our legitimate interests to find suitable candidates for vacancies at Calor;
- we process the personal data you have made public through your public profiles on LinkedIn, and other social networks or similar sites for professional purposes as well as any correspondence between you and our Calor. Dependent upon what information you have made available, this may include information such as your name, contact details (phone number, email and postal address), employment history, education history, qualifications/training details, skills, recommendations, and CV.

**F. To protect your vital interests**

When it is necessary to process your personal data to protect your vital interests, we will do so. This could be the case, for example, when you have a disability or medical condition that we need to be aware of when you are visiting us at our premises.

For this purpose:

- we process your personal data to protect your vital interest.
- we may process your contact details, the contact details of your emergency contact, the location of your place of work and any relevant health data that you have provided to us.

**G. To inform you and communicate with you about other vacancies**

Sometimes, we may not have the right role available for you yet. If you choose, we will keep information about you in our systems in order to be able to contact you if we have future vacancies that may be of interest to you. We may also invite you for recruitment activities or communicate with you about job opportunities.

For this purpose:

- we will process your personal data based on your consent when you choose to keep your information in our systems.
- we process your contact details (such as phone number, email and postal address) and the information you submitted to us in the course of previous job applications (for example, your CV).

**H. To comply with the law**

In some cases, Calor processes your personal data to comply with the laws and regulations in the country where you applied such as HR-related obligations, employment laws, anti-discrimination laws or regulations related to subsidies. In order to comply with laws and regulations, we may need to disclose your personal data to government institutions or supervisory authorities.

For this purpose:

- we process your personal data to comply our legal obligations.
- we process your name, contact details (phone number, email and postal address), date of birth, eligibility to work in the UK (including but not limited to driving licence or ID card, work permit/Visa details, passport details, birth certificate and/or National Insurance number), VAT details, tax details, national insurance details, payment details (banking information etc.). This is a legal obligation because this information it is necessary for entering into an employment contract with you.
- we process your personal data including age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, ethnicity, religion or belief, sex, or sexual orientation should you chose to share this with us. This is to comply with our legal obligations (where we are required to comply with ethnicity, disability and gender pay gap reporting obligations) or for our legitimate interests in order to monitor and report on diversity and inclusion.
- we may process education, qualification and training information dependent on the role for which you are being considered (for example for industry or specialism or for specific training requirements). This will be in the case where we have either a legal obligation or legitimate interest to do so.

**I. To protect health, safety, security and to ensure integrity**

At Calor, we highly value your health, safety, security and integrity. When you visit us, we process your personal data in order to safeguard our employees, customers, suppliers and business partners. As such, we authenticate your access rights to our premises. We also process your personal data to prevent or investigate any suspected or actual criminal activity and to protect Calor and employee and customer assets. More specifically, we protect our premises by using CCTV cameras and site access systems or logs. Any CCTV recording we undertake in this regard will be overt unless strictly necessary (for example, as part of a specific investigation in exceptional and justifiable circumstances).

For this purpose:

- we may process your personal data based on our legitimate interest and/or a for a recognised legitimate interest such as to monitor our internal processes, the protection of our assets, society and our habitat, to prevent and investigate alleged or actual criminal activity and in order to comply with the law (transport, environmental and health and safety laws and regulations, and support law enforcement agencies in the prevention, detection and prosecution of crime).
- we process your contact details, relevant personnel file details, insurance details, location and the relevant health data that you provided to us, CCTV imagery and site access systems or logs.

**J. To safely deliver our products and services**

Before you start working for Calor, we wanted to let you know that Calor uses vehicle cameras, telematics and location technology to know where relevant vehicles are located at any given moment for environmental and health and safety purposes, to promote safe driving and to protect the well-being of employees and the environment, for employee and public security and protection of property (tracking stolen vehicles), for efficient driving and a reduction of CO2 emission as a result from more efficient driving and to provide effective customer service notifications.

This is particularly relevant if you are planning to become a driver, but could apply to you in other roles requiring

frequent business travel.

For this purpose:

- we may process your personal data based on our legitimate interest and/or a for a recognised legitimate interest such as to monitor our internal processes, the protection of society and our habitat as well as our property, provide effective customer service and in order to comply with the law (transport, environmental and health and safety laws and regulations).
- to comply with the law and our legitimate interests to protect society and property; we process your contact details, relevant personnel file details, insurance details, location and organisations and the relevant health data that you provided to us, CCTV imagery, telematics data including vehicle data regarding route, speed, acceleration, breaking, turns, functioning of the vehicle and driver-facing camera imagery and geo-location.
- to provide effective customer service we process your name, geo-location data, Calor contact details, avatar image.

**K. For dispute resolution or to defend legal proceedings**

If you have a dispute, or make a legal claim, or we exercise our legal rights to bring a claim against you, we will process any data we hold which is relevant to the dispute or claim in order to make, resolve, settle or defend it.

For this purpose:

- we process your personal data for our legitimate interests.
- We may process your name, contact details (phone number, email and postal address), date of birth, eligibility to work in the UK (including but not limited to driving licence or ID card, work permit/Visa details, passport details, birth certificate and/or National Insurance number and proof of address documents), VAT details, tax details, national insurance details and payment details, recruitment information including information such as your employment history, education history, qualifications/training details, extra-curricular activities, your location, current or previous job and position data, your availability, current or previous terms of employment, declaration of employment status age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

## 4. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Calor will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this policy. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting, or necessary technical requirements.

In specific circumstances, we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Promptly after the applicable storage period has ended, the data shall be:

(i) securely deleted or destroyed;

(ii) anonymised or pseudonymised; or

(iii) put “beyond use”.

We generally shall retain all Applicant data for up to the period of 1 year unless related to claim, litigation or legal action in which case such relevant data may be retained for up to the period of 7 years. At the point of us entering into an employment contract with you, the relevant data will continue to be retained in line with our Privacy Policy for Colleague Data and related retention principles.

## 5. WHO HAS ACCESS TO YOUR PERSONAL DATA?

**Access to your personal data within Calor**

Employees involved in the relevant recruitment procedure may have access to the personal data you make

available to us, only to the extent necessary to fulfil their respective tasks. These employees include for example, our recruiters, HR employees and the relevant recruiting manager(s).

In some cases, your personal data may be transferred to a country that does not provide an adequate level of protection of personal data. Calor will take measures to ensure that your personal data is adequately protected. For this purpose, binding corporate rules are applicable throughout the SHV group of companies to which Calor belongs.

**Access to your personal data by third parties**

The following types of third parties may have access to your personal data where relevant for the provisioning of their products or services to Calor, including but not limited to: banks, insurance companies, credit card companies, IT suppliers and consultants including website, data or software suppliers and hosts, travel agencies, embassy, financial, tax or legal advisors, clients, accountants, Acas, alternative dispute resolution (ADR) providers, His Majesty's Courts and Tribunals Service (HMCTS), CCTV or telematics suppliers, lease companies, inspection authorities, medical inspection authorities, forensic specialists, training centres, facility services, delivery services of packages and letters, occupational health providers, drugs and alcohol testers, benefit and other service providers, vetting and referencing companies, brokers, insurers, employment agencies, outsourcing and resourcing solutions, payroll and other system providers.

When third parties are given access to your personal data, Calor will take the required contractual, technical and organisational measures to ensure that your personal data is only processed to the extent that such processing is necessary. The third parties will only process your personal data in accordance with applicable law.

If your personal data is transferred to a recipient in a country that does not provide an adequate level of protection of personal data, Calor will take measures to ensure that your personal data is adequately protected, such as entering into specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, such as the International Data Transfer Agreement.

In other cases, your personal data will not be supplied to third parties, except when required by law.

## 6. HOW IS YOUR PERSONAL DATA SECURED?

We have taken adequate safeguards to ensure the confidentiality and security of your personal data. We have implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to unnecessary collection) or further processing.

## 7. HOW CAN YOU EXERCISE YOUR PRIVACY RIGHTS?

You have the right to request access to or an overview of your personal data, and under certain conditions, rectification and/or erasure of personal data. In addition, you may also have the right of restriction of processing concerning your personal data, the right to object to processing as well as the right to data portability.

To invoke your privacy rights, please contact us by using the contact details at the bottom of this Privacy Policy. Keep in mind that we may ask for additional information to verify your identity.

Data subject rights exercised through Calor will not automatically be exercised by any third party joint controller working with Calor. Should you wish for such third party joint controller to also exercise data subject rights you will need to contact them directly.

## 8. CAN YOU WITHDRAW YOUR CONSENT?

Once given, you may always withdraw your consent. Please keep in mind that withdrawal does not have retrospective effect and the withdrawal of your consent is only possible in case you first have given your consent. Please contact us to withdraw your consent by using the contact details at the bottom of this Privacy Policy.

## 9. DATA PROTECTION COMPLAINTS

If you are unhappy with how we collect, use, or protect your personal data or consider we have not complied with your privacy rights, you have the right to make a complaint. In the first instance, we ask that you please contact us directly using the contact details set out in section 10 (How to contact us) above so that we can investigate and try to resolve your concerns. Please include your name, contact details, and sufficient information about your complaint to help us respond. We may ask for additional information to allow us to confirm your identity and to enable us to effectively investigate your complaint.

We aim to acknowledge complaints within 30 days of receipt. We will then investigate your complaint and explain the outcome of our investigations to you.

If you remain dissatisfied, or if you prefer not to raise your concern with us directly, you also have the right to make your complaint to the Information Commission (IC) (formerly known as the Information Commissioner's Office (ICO)), the UK regulator for data protection issues. You can make complaints online or by telephone as follows:

- Online: Make a complaint about how an organisation has used your personal information | ICO
- Telephone: 0303 123 1113

## 10. HOW TO CONTACT US

If you have any questions about the way we process your personal data, please read this policy first. For additional questions, remarks, compliments or complaints, please contact in the first instance Calor's Privacy Officer by e-mail to PrivacyOfficer@calor.co.uk.

## 11. ROLES AND RESPONSIBILITIES

Overall responsibility for this policy sits with Calor's Privacy Officer and the Group Legal team.

However, all Colleagues at Calor who manage or can access the personal data of Applicants have a responsibility to support the operation of this policy and to comply with data protection laws, including but not limited to, ensuring personal data is accurate and complete, only collecting, using, retaining and sharing personal data as is necessary or for legitimate purposes and storing personal data securely.

## 12. REFERENCES

Data Protection Act 2018

Data (Use and Access) Act 2025

Employment Rights Act 2025

Information Commission's Office guidance (available at https://ico.org.uk/)

Privacy Policy for Colleague Data

Data Retention Policy

Fleet Monitoring Policy

## 13. VERSION HISTORY

| Version Number | Issue Date | Description of changes |
|---|---|---|
| 1 | 17/05/2018 | First version |
| 2 | 30/11/2019 | • Added sections 2I. and 2J.<br>• Added email addresses for DPO contacts<br>• Better reflect our processing in terms of:<br>  ○ CCTV Monitoring<br>  ○ Vetting / verification of qualifications<br>  ○ Social media |

| | | |
|---|---|---|
| | | ○ Joint controllerships<br>○ Transparency surrounding telematics, location tracking and CCTV use on applicable vehicles |
| 3 | 09/10/2026 | • Added section 2.K.<br>• Changes required under Data (Use and Access) Act 2025 and Employment Rights Act 2025<br>• New clause regarding Artificial Intelligence (AI) |

## 14. MONITORING AND MANAGEMENT

This policy is reviewed routinely every 2 years. However, Calor reserves the right to make changes to it whenever necessary, including but not limited to, reflect relevant changes in law or regulatory guidance, changes to other Calor policies or changes within Calor or our ways of working that may concern or impact the privacy of Applicants.

If significant changes are being made during your application process, we will inform you.