



## GDPR Policy

LSP Renewables Limited ("LSP") are committed to protecting and respecting your privacy. Your personal data and privacy matters. Personal data means any information about an individual from which that person can be identified.

Any mention of "Our Group" means LSP's subsidiaries or our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This notice together with our terms of use [www.lsprenewables.com] sets out the basis on which any personal data LSP collect from you, or that you provide to us, will be processed by us.

This privacy policy applies to:

- Website Users – any individual visitors to, and users of, LSP's websites whose personal data is collected by LSP in the course of the Website Users' use and navigation around our website;
- Candidates – applicants for any type of job or engagement via LSP whose personal data is collected in the course of our services;
- Referees – referees of Candidates whose personal data is collected in the course of our verification of a Candidate; and/or
- Corporate Staff – individuals who work for, or are engaged by, LSP's customers, clients or suppliers whose personal data is collected in the course of our work with them.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

"Data Protection Legislation" means all applicable laws and regulations, as amended or updated from time to time, in the United Kingdom relating to data protection, privacy and electronic communications including without limitation, (a) the Data Protection Act 2018; and (b) the United Kingdom's General Data Protection Regulation (Retained Regulation (EU 2016/679) ("UK GDPR").

For the purposes of data protection legislation in force from time to time the data controller is LSP Renewables Limited of Imperial House, 21-25 North Street, Bromley, Kent BR1 1SD United Kingdom.

LSP's nominated data representative can be mailed at [privacy@lsprenewables.com](mailto:privacy@lsprenewables.com)

### **Who LSP are and what we do**

LSP are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). LSP collect the personal data of the following types of people to allow LSP to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;



- Supplier contacts to support our services and
- Employees, consultants, temporary workers.

LSP collect information about you to carry out our core business and ancillary activities.

### **Information you give to LSP or we collect about you.**

This is information about you that you give LSP by filling in forms on our site ([www.lsprenewables.com](http://www.lsprenewables.com)) or by corresponding with LSP by telephone, e-mail or otherwise. It includes information you provide when you register to use LSP's website, to enter our database, subscribe to our services, participate in discussion boards or other social media functions and when you report a problem with our site.

The information you give to LSP or LSP collects about you may include your name, address, private and corporate e-mail address and telephone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work, curriculum vitae and photograph, links to your professional profiles available where you have shared your data in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

### **Information LSP obtains from other sources.**

This is information LSP obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card and personal recommendations. In this case, LSP will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

LSP are working closely with third parties including companies within our Group, business partners, clients of LSP, sub-contractors and professional advisors. LSP may receive information about you from them for the purposes of our recruitment services.

### **Purposes of the processing and the legal basis for the processing**

LSP use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and LSP and to provide you with the information and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate interests, described in more detail below, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

LSP will rely on contractual obligations if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.



LSP will rely on legal obligation in some cases, where we are required by law or regulation to process your data.

LSP will in some circumstances rely on consent for particular uses of your data. Where LSP rely on consent, you will be asked for your express consent. An example of when we will rely on consent as the legal basis for processing your data is when we process your data for marketing purposes.

### **LSP's Legitimate Interests**

LSP's legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data. The database will contain historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

### **Consent**

Should LSP want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Other Uses LSP will make of your data:

LSP does not undertake automated decision making or profiling. We use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

### **Do you have to provide LSP with personal data?**

You may refuse to give LSP your personal and sensitive personal data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. You can set your browser not to accept cookies but this may cause problems with some features of the website.

### **Disclosure of your information inside and outside of the EEA**

LSP will share your personal information with:



Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

- Clients for the purpose of introducing candidates to them;
- Candidates for the purpose of arranging interviews and engagements;
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- subcontractors including payment and other financial service providers;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

LSP will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If LSP or substantially all of its assets are acquired by a third party, in which case personal data held by LSP about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of LSP, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

#### **Where LSP store and process your personal data**

The data that LSP collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may/will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this processing. LSP will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.



Unfortunately, the transmission of information via the internet is not completely secure. Although LSP will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Retention of your data**

LSP understands our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate interests and that you are happy for us to do so. Different laws require LSP to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. LSP must also keep your records of payments to you or an intermediary for as long as is legally required by national minimum wage, social security and tax legislation. Where LSP has obtained your consent to process your personal/sensitive personal data we will do so in line with our retention policy. Where consent is not granted, LSP will cease to process your personal data and sensitive personal data.

- Your CV and associated data (when we have not found work for you) – 5 years from the date of our last contact.
- Your CV and associated data (when we have found temporary work for you) – 6 years from the last date of payment.
- Your CV and associated data (when we have found permanent work for you) – 5 years from the date of our last contact.

LSP do the following to try to ensure that the data we hold on you is accurate:

- prior to making an introduction we check that we have accurate information about you and

we keep in touch with you so you can let us know of changes to your personal data.

We segregate our data so that we keep different types of data for different time periods.

The criteria we use to determine whether we should retain your personal data include:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may store and handle your data in the following ways:

- We may archive part or all of your personal data, retain it on our financial systems only or delete all or part of the data from our main Customer Relationship Manager (CRM) system.
- We may pseudonymise parts of your data, particularly following a request for restriction or erasure of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

### **Marketing**



Any information that you choose to give to LSP will not be used for marketing purposes by us. LSP will hold your personal information only for the purposes of providing to you our business services.

#### Your rights

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The GDPR provides you with the right to:

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in certain formats, if practicable.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>.

#### Access to information

The Data Protection Act 2018 and the GDPR give you the right to access information held about you. LSP also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the GDPR.

A subject access request should be submitted to [privacy@lsprenewables.com](mailto:privacy@lsprenewables.com). No fee will apply unless the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character. In such circumstances, LSP may charge a fee or refuse to act on the request.

#### Changes to LSP's privacy notice

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice. This Privacy Policy was last updated on 2nd June 2022.