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Services to the Onshore Natural Gas Industry

General Data Protection Regulations Privacy Notice – Clients

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us.

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003.

This notice applies to you if you are an individual client (such as a sole trader or partnership) or an employee of a corporate client or group company of a corporate client, who (i) has contacted us to assist with the hiring of contract based and/or full-time talent for your business; or (i) we have contacted about the services we offer as a business. This notice does not form part of any contract to provide services.

This privacy notice does not apply to you if you are an employee, worker, candidate or consultant of ours. The notice that applies to our candidates can be accessed on our website.

References to **we**, **our** or **us** in this privacy notice are to Wilcock Consultants Limited, a limited company incorporated in England and Wales. Registered Number: 02927854. Registered Office: The Cinema Studio, Palace Building, Main Street, Grange-over-Sands, Cumbria, LA11 6AB.

We use the trading name Wilcock Consulting.

1. PERSONAL INFORMATION

In order to source the very best talent for you and keep you up to speed with the latest recruitment developments in the market, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- location of employment or workplace;
- identification documents such as passport, utility bills, identity cards, etc;
- any tax or other government identifiers;
- your marketing preferences so that we know whether and how we should contact you;
- images and audio in video format (where we record any footage of a video-conference between you and a candidate) and audio recordings.

- Depending on the nature of our interactions with you, there may be certain essential personal information that we must collect from you in relation to your relationship with us. This will vary depending on the relationship we have with you.
- We may also ask you for additional personal information which it is optional for you to provide but which will allow us to better tailor our relationship with you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you or details of any personal interests or outside work information, e.g. hobbies, marital status, favourite sports teams etc.
- We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.

2. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our clients when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about our clients through other sources such as from LinkedIn, hiring platforms, personnel recommendations and referrals and through the use of business development tools.

3. USES MADE OF THE INFORMATION

We are committed to protecting your privacy, and will only use your personal information in accordance with applicable data protection legislation, including the Data Protection Act 2018 and the General Data Protection Regulation and the UK implementing legislation. Most commonly, we will use your personal information in the following circumstances:

- where we need to perform, or take preparatory steps to perform, the contract we have entered/shall enter into with you [🔷];
- where we need to comply with a legal obligation [▲]; and
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. [■]. These legitimate interests are to formulate and manage our relationship with you as a potential or actual customer, determine our respective rights and obligations and to properly conduct our business.

We may also use your personal information in the following situations, which are likely to be rare:

- where we need to protect your interests (or someone else's interests); and
- where it is needed in the public interest.

- There are more limited circumstances where we process personal data pursuant to your consent [♣].
- The situations in which we will process your personal information are listed below. We have indicated by colour coding the purpose or purposes for which we are processing or will process your personal information:
  - where you have provided us with/we have collected your personal information directly from you:
    - to analyse your profile, and candidate hiring preferences; 🔷■

- to match you with the best available contract and/or full time talent from your industry and competitors based on your hiring preferences;◆■
- where your personal information has been sourced indirectly from a third party, to contact you with information regarding new talent that may be of interest to your business; ♣■
- administering any account(s) you have with us and managing our relationship with you including dealing with any support enquiries made by you; ◆■▲
- arranging an interview with/introduction to a prospective candidate in relation to a particular job role and managing the introductory process; ◆■
- ensuring that we maintain proper business records; ◆■▲
- dealing with any legal disputes involving you; ■▲
- for staff training purposes in order to improve the services we provide; ■
- to receive commissions payments from you; ◆■
- to send you marketing information we think you might find useful or which you have requested from us, including information about our services and any events we are running, provided you have indicated that you are happy to be contacted for these purposes;♣■
- to conduct data analytics studies and market research to review and better understand market trends within the recruitment industry; ■
- storage of records relating to you and the business you work for/your business; ◆■▲

- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.
- We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision making

- You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do use technology to better match you with candidates that fit your requirements so that you only receive relevant profiles, but there will always be an element of human interaction in the decision making.

4. SPECIAL CATEGORY PERSONAL INFORMATION

We will not process any special category data regarding you.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may share your personal information where it is necessary to administer the working relationship or we have a legitimate interest in so doing. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation,

or in order to enforce or apply such other terms as apply to our relationship, or where we have a legitimate interest in doing so. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

- The third parties we share your personal information with where required by law are courts and governmental agencies.
- We may also share your personal information with the following third parties:
    - **third party service providers in relation to the following activities:** email marketing specialists, payment processors, data analysis, business development tool providers and IT services (including CRM, website, video- and teleconference services);
    - candidates for the purpose of introducing you as a prospective new employer; and
- All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.
- In certain cases the disclosure of your personal information to a third party as described in this paragraph 5 may involve your personal information being transferred outside of the United Kingdom. This may be to:
    - a country in the European Economic Area or that is otherwise considered to have data protection rules that are equivalent to those in the United Kingdom; or
    - a country which is not considered to have the same standards of protection for personal data as those in the United Kingdom, in which case we will take all steps required by law to ensure sufficient protections are in place to safeguard your personal information, including where appropriate putting in place contractual terms approved by the relevant regulatory authorities.
- For more information about the circumstances in which your personal information may be disclosed to third parties and the safeguards we put in place to protect your personal information when we do so, please contact us as described in paragraph 5.
- We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

1. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

You should take all reasonable steps to keep your personal information held on out IT systems secure, including choosing a secure password if you have an online account with us and not disclosing your passwords to anybody else.

2. YOUR RIGHTS AND RETENTION, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION

- The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for period of 6 years after your last contact with us. Exceptions to this rule are:
    - Telephone and videoconferencing recordings which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime; *and*
    - Information that may be relevant to any discrimination claims may be retained until the limitation period for those types of claims has expired.
- It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change roles, your phone number or email address. You will be able to update some of the personal information we hold about you through the hiring platform we administer for you. Alternatively, you can contact us using the details in paragraph 5.
- Under certain circumstances, by law you have the right to:
    - request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
    - 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 the 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 stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
    - 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;
    - object to the processing of your personal information based on legitimate interests, but not if we have a compelling reason to process it;
    - object to automated decision making (although this does not currently apply as we do not currently carry out automated decision making); and
    - request the transfer of your personal information to another party.

- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please use the contact details in paragraph 5.
- You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

3. ENQUIRIES, ISSUES AND COMPLAINTS

- In the unlikely event that you have any concerns about how we use your personal information, please contact us as described in paragraph 5.
- If you make a complaint about our handling of your personal information, it will be investigated and we will reply within 30 days.
- If we are unable to resolve your complaint, you may make a complaint to the Information Commission. Please see https://ico.org.uk/for-the-public/raising-concerns/ for more information.

4. CHANGES TO THIS PRIVACY NOTICE

- We reserve the right to alter this privacy notice at any time. Such alterations will be posted on our intranet. You can also obtain an up-to-date copy of our privacy notice by contacting us as described in paragraph 5. Should you object to any alteration, please contact us.

5. CONTACTING US

- If you need to contact us about this notice or any matters relating to the personal information we hold on you, you can do so via our QHSE Compliance Manager Helen Colwill at helenc@wilcock.co.uk or 01229 824034.

6. FURTHER INFORMATION

- We hope that the contents of this privacy notice address any queries that you may have about the personal information we may hold about you and what we may do with it. However, if you do have any further queries, comments or requests, please contact us as described in paragraph 5 above.
- Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commission website at https://ico.org.uk/for-the-public/.



Graham Wilcock, Managing Director
21st May 2026

Rev. 4 Reviewed following Management Review Meeting 14/05/2026



Wilcock Consultants Limited is an Employment Business
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