The Cinema Studio
Palace Building
Main Street
Grange-over-Sands
Cumbria LA11 6AB
United Kingdom

Tel: +44 (0)1229 824034
Web site: www.wilcock.co.uk

**Services to the Onshore Natural Gas Industry**

**General Data Protection Regulations Privacy Notice – Employees, Workers, Candidates and Consultants**

This notice applies to our current and former employees, workers, candidates and consultants. This notice does not form part of any contract of employment or other contract to provide services.

This privacy notice does not apply to you if you are our client, and in this case our client privacy notice states the nature and purposes of our processing.

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.

This privacy notice also covers any joint venture companies, bodies or organisation that we have an interest in and to which you are seconded, carrying out activities on behalf of or are appointed as one of its officers or representatives.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Compliance Manager has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

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. This notice explains how we comply with the law on data protection and what your rights are.

For the purposes of this privacy notice the controller is us or our joint venture companies, bodies or organisations which is processing your personal information.

Electronically stored information is subject to numerous security measures and is managed at all times in a way that reduces risk to our business, our customers and all interested parties to a manageable and acceptable level. Staff training in data protection and risk management procedures ensures that this is undertaken in a controlled manner. We strive to minimise the risks of an information security incident.

Any hard copy information received is scanned and saved electronically with the original information then sent for confidential waste paper recycling.

## 1. PERSONAL INFORMATION

When you interact with us in relation to your work with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;

- date of birth;
- gender;
- marital status and dependants;
- referee details, next of kin, beneficiaries, details of family members and emergency contacts;
- national insurance number and other tax or governmental identifiers;
- bank accounts, payroll and tax status;
- salary, bonus, profit share, remuneration, pension, insurance, benefits and expenses;
- start date and leaving date;
- location of employment or workplace;
- attendance history, annual leave;
- driving licence(s) (including copies where we are required to hold such information for identification or insurance purposes where you are to use our vehicles) and vehicle details;
- identification documents and information such as passport, utility bills, identity cards, visas, signature, etc;
- recruitment (including copies of right to work documentation, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- work records (including job titles, work history, working hours, training records and professional memberships, maternity, paternity and compassionate leave) and education and professional records/qualifications;
- compensation history and charity donation preferences;
- performance including that generated through our appraisal systems;
- disciplinary and grievance information;
- movements though CCTV footage and other information obtained through electronic means such as swipecard and key fob records;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- attendance at events or functions;
- images in video and/or photographic form and voice recordings;
- a log of communications with candidates, workers and consultants by telephone and email
- loans that you have made to us or we have made to you.

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 with additional information about your dietary preferences in connection with a social engagement.

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. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information; and
- biometric information about you, for example fingerprints, retina scans.

We may not collect all of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below we refer to these as the "special category reasons for processing of your personal data".

For criminal records information in relation to you we process it on the basis of legal obligations or based on your explicit consent.

## 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about employees, workers, candidates and consultants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout the period of you working for us, from our advisors or from your advisors.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "**Your rights in relation to personal information**" section below.

## 4. USES MADE OF YOUR PERSONAL INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

| *Purpose* | *Personal information used* | *Lawful basis* |
|---|---|---|
| **Non- 'special categories' of Personal Information** | | |
| **Making a decision about your recruitment or appointment and managing the recruitment process and determining the terms on which you work for us and where applicable our clients** | All the personal information we collect for the purposes of the recruitment process | We need this information to be able to perform and administer the recruitment process for you to engage you<br><br>This is necessary to enter into a contract with you |
| **Checking you are legally entitled to work in the UK** | Personal contact details and identification documents and right to work documentation | We have a legal obligation to do so |
| **Producing and maintaining business records, staff directories, intranets, websites, brochures and other internal and external business documentation and materials** | Personal contact details, location of employment or workplace and employment records | We have a legitimate interest to maintain up to date business records and materials |
| **Paying you and, if you are an employee or worker, deducting tax and National Insurance contributions** | Personal identifiers and transaction and payment information | To be able to manage and perform our contract with you<br><br>We have a legal obligation to do so |
| **Providing benefits of employment or working, including flexible benefits and liaising with benefit providers** | Personal identifiers, salary, annual leave, pension and benefits entitlement, transaction and payment information | To be able to manage and perform our contract with you<br><br>We may have a legal obligation to do so |
| **Administering the contract we have entered into with you and our contracts with clients** | All your personal information excluding 'special categories' of personal information and criminal records information | To be able to manage and perform our contract with you |

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| **Conducting performance reviews, grievance or disciplinary hearings, managing performance and determining performance requirements and making decisions about compensation and benefits and administration relating to the same** | Performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits | We have a legitimate interest to ensure that our workers are meeting their performance objectives and that the business is managing and controlling the performance process effectively<br><br>To be able to manage and perform our contract with you |
| **Business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you and our clients** | All your personal information excluding 'special categories' of personal information and criminal records information | To be able to manage and perform our contract with you and our clients.<br><br>We have a legitimate interest to run and manage our business |
| **Assessing qualifications for a particular job or task, including decisions about promotions and ascertaining your fitness to work, education, training and development requirements** | Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits and other personal information excluding 'special categories' of personal information and criminal records information | We may be legally obliged to do so<br><br>To be able to manage and perform our contract with you and our clients<br><br>We have a legitimate interest to run and manage our business and to ensure that our people are suitably trained |
| **Making decisions about your continued employment or engagement or termination of our working relationship** | Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits | We have a legitimate interest to ensure that the workers we engage continue to be suitably qualified and/or appropriate for their role |
| **Managing sickness absence** | Personal identifiers, attendance history and performance | To be able to manage and perform our contract with you and our clients<br><br>We have a legitimate business interest to ensure that the workers we engage continue to be suitably qualified and/or appropriate for their role |

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| **Complying with health and safety obligations** | Personal identifiers, CCTV footage and other information obtained through electronic means such as swipecard and key fob records, working environment information | We have a legal obligation to comply with Health and Safety laws<br><br>We also have a legal obligation to report any accidents at work in accordance with health and safety laws |
| **Dealing with legal disputes involving you, or other employees, workers, candidates and consultants, including accidents at work** | All your personal information excluding 'special categories' of personal information and criminal records information | To be able to manage and perform our contract with you and our clients<br><br>We have a legitimate interest to ensure that all legal claims are managed effectively |
| **For the purposes of ensuring the security of our premises, systems and our information, to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution** | Personal identifiers, CCTV footage and other information obtained through electronic means such as swipecard and key fob records<br>Use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information | We have a legitimate business in ensuring our premises and systems are secure<br><br>To be able to manage and perform our contract with you and our clients |
| **To facilitate the use of our IT systems and monitor your use of our information and communication systems to ensure compliance with our IT policies** | Personal identifiers, CCTV footage and other information obtained through electronic means such as swipecard and key fob records<br>Use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information | We have a legitimate interest in ensuring that our workers use our computer systems and information correctly and efficiently and in compliance with our IT policies<br><br>To be able to manage and perform our contract with you and our clients |

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| **To comply with our legal obligations, for example in relation to PAYE, National Insurance, Companies House filings** | Personal identifiers, transaction and payment information, national insurance number and other tax or governmental identifiers<br>bank account details, payroll and tax status, name, address, date of birth, other directorships | We have a legal obligation to do so |
| **To conduct data analytics studies to review and better understand worker engagement, retention and attrition rates** | Employment and rejection records | We have a legitimate interest in order to improve as an employer and employment agency/business |
| **For the purposes of equal opportunities monitoring** | Name, title, date of birth; gender; marital status; salary, annual leave, pension and benefits; location of employment or workplace | We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our business is a fair place to work |
| **Storage of records relating to you and also records relating to our business** | All non-'special categories' of personal information | To be able to manage and fulfil our contract with you and our clients, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records |
| **To manage our relationship with you and our clients and to deal with any disputes or claims involving you** | All the personal information about you excluding special category information and criminal records information | To be able to manage and fulfil our contract with you and our clients, we may have a legal obligation to do so and we also have a legitimate interest to manage our relationship and deal with disputes |
| **For the purpose of complying with any legal or regulatory requirements** | All the personal information about you excluding special category information and criminal records information | We have a legal obligation to comply with any legal requirements and we have a legitimate interest in complying with any regulatory requirements |
| **'Special categories' of Personal Information or criminal records** | | |
| **Storage of records relating to you and also records relating to our business** | All 'special categories' of personal information | We process special category personal data on the basis of the "special category reasons for processing of your personal |

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| | | data" referred to in section 2 above. For criminal records information we process it on the basis of legal obligations or based on your explicit consent. |
| **We will use information relating to your absence from work, which may include sickness absence or family-related absences, to comply with employment and other laws** | Information about your health, including any medical condition, health and sickness records, medical records and health professional information | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above |
| **We will use information about your physical or mental health to provide you with benefits under your contract** | Information about your health, including any medical condition, health and sickness records, medical records and health professional information | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above |
| **We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits** | Information about your health, including any medical condition, health and sickness records, medical records and health professional information | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above |
| **We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation or political beliefs, to ensure meaningful equal opportunity monitoring and reporting** | Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above |
| **For drug and alcohol testing to check compliance against your contract terms and compliance with legal requirements an client requirements** | Information about your health, including any medical condition, health and sickness records, medical records and health professional information | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above |

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| **We will use and retain information about criminal convictions to comply with law and in order to determine your eligibility to undertake particular types of work** | Information about your criminal convictions and offences | For criminal records information we process it on the basis of legal obligations or based on your explicit consent |
| **To comply with our legal obligations and our regulatory obligations** | All 'special categories' of personal information we collect about you<br><br>All criminal records information we collect about you | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above excluding consent<br><br>For criminal records information we process it on the basis of legal obligations or based on your explicit consent |
| **To manage our relationship with you and to deal with any disputes or claims involving you** | All 'special categories' of personal information we collect about you<br><br>All criminal records information we collect about you | We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above<br><br>For criminal records information we process it on the basis of legal obligations or based on your explicit consent |

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage your or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your engagement. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Companies in the same group of companies as us**: for the purpose of providing a service to you.
- **Any party approved by you**.
- **Our professional advisors**: such as lawyers, accountants, financial advisors, consultants and other advisors.
- **Your professional advisors**: such as lawyers, accountants, financial advisors, consultants and other advisors
- **Clients of our business where necessary**: for example for candidates seeking positions with our clients or those workers and consultants engaged by us working for our clients; or if you are visiting the premises or site of a customer they will need your details for access and security.
- **Other service providers to our business and advisors**: for example payroll, pension administration, benefits provision, banks, professional advisors, contractors, CCTV providers and administration and IT services. All our third-party service providers are required to take appropriate security measures to protect your personal information.
- **Purchasers of our business**: buyers or perspective buyers to whom we sell or negotiate to sell our business.
- **Prospective new employers**: for the provision of references for you.
- **The Government or our regulators**: where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commission.
- **Police, law enforcement and security services**: to assist with the investigation and prevention of crime and the protection of national security.

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.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting us**" section below.

Our directors and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section "**Disclosure of your personal information**" above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the "**Contacting us**" section below.

## 7. HOW LONG WE KEEP PERSONAL INFORMATION FOR

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 a period of 6 years (if you are a current employee or worker/consultant, this may be for 6 years after your employment/assignment ends). Exceptions to this rule are:

- CCTV records 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;
- Details regarding unsuccessful job applicants (for direct employment with us) where we hold records for a period of not more than 12 months;
- Information that may be relevant to personal injury claims, employment claims, discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.
- Information that may be useful to a pension provider or benefit provider which we may retain for the period that your pension or benefit is payable.

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 move home or change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below or contact a member of the HR department.

## 8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and

- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example we do not use automated decision making in relation to your personal data. However some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

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's website at https://ico.org.uk/for-the-public/.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can complain to us using the details set out in the "Contacting us" section below. We will investigate your complaint and reply within 30 days. You may also complain to the UK Information Commission or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## 10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email our QHSE Compliance Manager Helen Colwill at helenc@wilcock.co.uk.



**Graham Wilcock, Managing Director**
**21st May 2026**

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