

Clan Partners is a provider of worldwide recruitment and personnel supply services to a variety of industries and sectors, with services delivered through multiple Subsidiary organisations. We set ourselves and our Subsidiary organisation demanding targets and ensure our QHSE values are supported by personal objectives from our teams.

We are committed to safeguarding the privacy of all persons under the control of Clan Partners & Subsidiaries, and as such, all tasks or services requiring the processing of personal data shall be completed within the bounds of the General Data Protection Regulation (GDPR). This Privacy Notice shall outline how we achieve this.

At all times, Clan Partners & Subsidiaries shall be what is known as the 'Data Controller' of the personal data provided to us. Where another party requires Clan Partners & Subsidiaries to share items of personal data, this shall be completed for a legitimate purpose (i.e. with a Client as part of the recruitment process) or with the consent of the Data Subject, and under the reassurance that the entity we are transferring the data to has an equivalent level of safeguarding in place.

The General Data Protection Regulation (GDPR) has been retained in UK law and will continue to be read alongside the Data Protection Act 2018, with technical amendments to ensure it can function in UK law. The Information Commissioner remains the UK's independent supervisory authority on data protection. The UK has and will maintain high standards of protection for personal data which includes the same [regulatory framework](#) for data protection as the EU and therefore is clearly essentially equivalent to the EU on data protection.

### **What is Personal Data?**

Personal data is information that can identify you as a living individual, and is split into two 'types' of data, each with specific controls and guidelines. General personal data includes data such as your name, address, National Insurance number, and online identifiers/location data. The second type, sensitive data, includes information on physical and mental health, sexual orientation, race or ethnic origin, religious beliefs, trade union membership and criminal records. Sensitive personal data must be protected to a higher level than general personal data.

### **How Do Clan Partners & Our Subsidiaries get your Personal Data?**

You may have made an application directly to Clan Partners or one of our Subsidiary organisations via email or a job advert, through social media, or by telephone. Clan Partners & Subsidiaries can process this data if we have a legal basis for doing so. There are 6 legal bases for processing data, but Clan Partners & Subsidiaries is most likely to rely on:

- That the processing is necessary for the performance of a contract with you (i.e. Recruitment or Training Services)
- That Clan Partners & Subsidiaries has a legitimate interest in processing your data
- Your consent

Different conditions apply to each of these legal bases.

### **What information does Clan Partners & Subsidiaries collect about you?**

Clan Partners & Subsidiaries will always collect basic contact information from you at the start of our relationship in order to maintain contact with you and provide our services. The other information that Clan Partners & Subsidiaries collects about you will vary, dependent on the nature of the services you are asking Clan Partners & Subsidiaries to provide. So that you can be clear on what data Clan Partners & Subsidiaries will require or hold, and how we treat and store that data, Clan Partners & Subsidiaries has developed a Data Inventory, which you can review at the end of this Privacy Notice. This can also be requested from your Clan Partners & Subsidiaries Representative or the Clan Partners & Subsidiaries QHSE Department at any time.

### **How does Clan Partners & Subsidiaries use the information about Data Subjects?**

As an Internal Employee of Clan Partners & Subsidiaries you can reasonably expect that Clan Partners & Subsidiaries will use your information to carry out the administrative and management requirements of an Employer. This will include paying you your salary via your bank account, calculating and making tax and NI contributions, and ensuring that you have the tools, training and competency required to carry out your role. We will also use your data to safeguard your personal safety, health, and welfare whilst at work.

As a Recruitment Candidate, you can reasonably expect that we will use your information to determine whether we can find you roles, and then share certain items of data (your name, formatted CV, training and competency information etc.) with Clients during the recruitment and placement process. We will also use your data to pay you the money you have earned whilst on assignment, calculate any relevant taxes or NI contributions, and safeguard your health, safety and welfare (so far as we are able) whilst you are on assignment with our Clients.

As a Training Candidate, data (name, date of birth, candidate reference numbers, evidence etc.) will be shared with Trainers, Assessors, Verifiers and Awarding Bodies in order for you to receive the relevant training, register you as a Candidate and receive your training certificate at the end of the training process. We will also use your data to obtain payment for any training services you have requested, ensure you are trained and assessed in a suitable environment for your needs, and safeguard your health, safety and welfare (so far as we are able) whilst you are on a training course.

Clan Partners & Subsidiaries may be required to perform and provide statistical analysis on the data that we hold and collect. Such data will normally be anonymised for this purpose, unless disclosure of individuals is a legal requirement of the process. At this point Clan Partners & Subsidiaries would gain your consent for your personal data to be used in such a way.

### Why does Clan Partners & Subsidiaries need the information about Data Subjects?

For all of the information you provide, Clan Partners & Subsidiaries must have a legal basis for processing the data. In almost all cases, Clan Partners & Subsidiaries' legal basis for processing your data will be one or a combination of the following:

- Legal Obligation – your information is required for Clan Partners & Subsidiaries to comply with any laws and/or regulations to which Clan Partners & Subsidiaries is subject.
- Legitimate Interests – your information is required for the purposes of legitimate interests pursued by Clan Partners & Subsidiaries or a Third Party, except where overridden by
- Contractual Necessity – your information is required for Clan Partners & Subsidiaries to take steps at your request with a view to entering into a contract OR for Clan Partners & Subsidiaries to perform the contract to which you are a party.
- Consent – you have freely given your consent for Clan Partners & Subsidiaries to process the information
- Vital Interests – processing of your information is necessary in order to protect the vital interests of the data subject, or another person, where the data subject is incapable of giving consent

Clan Partners & Subsidiaries have indicated the legal basis behind the request for each item of personal information you supply on our Data Inventory.

### How long does Clan Partners & Subsidiaries keep the information about Data Subjects?

Different pieces of information required by Clan Partners & Subsidiaries have different retention periods attached to them. Some of these are dictated by law i.e. basic contact and tax information must be retained for a minimum of 6 years under UK tax law. Some others are dictated by the type of information i.e. records of incidents, accidents, occupational health problems and complaints will depend on whether there are outstanding legal proceedings and may be retained indefinitely. Clan Partners details these retention periods within the data inventory attached at the end of this Privacy Notice.

### Who does Clan Partners & Subsidiaries share information about Data Subjects with?

Clan Partners & Subsidiaries will be required to disclose your personal information to our Corporate Finance Team for us to process payroll and other necessary functions provided to Clan Partners & Subsidiaries at a corporate level.

We will also be required to provide the necessary data to our Clients for them to consider your application during the recruitment process and, should you be accepted for an assignment, during the placement process. We will be required to share certain information i.e. Name, Date of Birth, lengths of service, with your nominated referees to obtain references on your behalf.

As a Training Candidate, Clan Partners & Subsidiaries will be required to provide Awarding Bodies with the necessary information to register you as a Candidate on external management systems, and ultimately confirm your completion of any course.

We may be required to disclose your information to Insurers and/or Professional Advisors insofar as is reasonably necessary for the purpose of obtaining or maintaining insurance coverage, risk management, professional advice or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We may disclose certain items of information (name, date of birth, contact details, Passport or ID number, physical size or details of illness or injury) to our suppliers insofar as is reasonably necessary for the booking of travel or accommodation, personal protective equipment or occupational health services. Clan Partners & Subsidiaries will always seek to advise you of any sharing of this information and gain your consent prior to the sharing of data, except where vital interests preclude.

In addition to the specific disclosures above, Clan Partners & Subsidiaries may disclose your personal data where such a disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Clan Partners & Subsidiaries does not, has not, and shall never, sell your personal data to Third Parties for marketing purposes.

### International Transfers of Your Personal Data

Your personal information is considered to be 'transferred across borders' when it is either PHYSICALLY transferred across a border, or when it is ACCESSED across borders. Clan Partners & Subsidiaries do not currently maintain offices outside of the United Kingdom, and our hosting facilities for the servers which maintain our systems are based within the UK.

However, we do conduct business with a list of international Clients and may therefore be required to transfer personal data across borders as a requirement of the recruitment process. We may also be required to transfer data across borders in the event you become involved in an emergency overseas. At all times, Clan Partners & Subsidiaries shall ensure that the transfer of personal data over an international border is protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission OR through binding corporate rules, a copy of which can be obtained via your Clan Partners & Subsidiaries Representative or the Clan Partners & Subsidiaries QHSE Department or Legal Advisor at any time. *Note: under the terms of GDPR, all countries within the EEA are deemed as having adequate data protection systems in place, therefore 'international' refers to transfers outside of the EEA.*

You should be aware that, when submitting personal data to Clan Partners & Subsidiaries via a Social Media portal, this data may be available for others to view around the world. Clan Partners & Subsidiaries cannot prevent the use (or misuse) of any such personal data by others. Your Clan Partners & Subsidiaries Representative shall always advise of a safe and secure method to submit personal data to Clan Partners & Subsidiaries for use by Clan Partners & Subsidiaries in our services.

## Your Data Rights

The GDPR gives you, the Data Subject, new and extended rights to control how your personal information is used.

- **Right to informed consent** – for your consent to be valid, you must know what you are consenting to. To give valid consent you must give Clan Partners & Subsidiaries a positive indication of your consent, through actively ticking a box or signing a document. Clan Partners & Subsidiaries (and other organisations) cannot accept your silence as consent or use a pre-ticked box. However, consent is NOT the only legal basis that organisations can use to process your data. If an organisation does not need consent to process your data, they should not, and will not, ask for it.
- **Right to withdraw consent** – if you have given consent to an organisation to process your personal data, you have the right to withdraw that consent. The organisation will then need to stop processing the data that you have given them, but they can continue to process other data if they rely on another legal reason for doing so.
- **Right to object** – you have the right to object to your data being processed. The organisation can then only process your data if it has a compelling legal reason for doing so.
- **Rights in relation to automated decision making or profiling** – you have the right not to be subject to a decision based purely on automated processing unless you have given your explicit consent. If the process is not fully automated, the organisation will not need your consent. Clan Partners & Subsidiaries does not make use of fully automated decision making or profiling in our services, but Recruitment Candidates may be shortlisted based on matching certain criteria. This process is always given final review by a Recruitment Specialist.
- **Right to make a Subject Access Request (SAR)** – A Subject Access Request is where you ask the organisation holding your data to provide you with a copy of the data they hold. If you make an SAR to Clan Partners & Subsidiaries, we will respond within a month. In certain situations, we may be required to extend this period to 2 months, but we will keep you informed of any progress. Clan Partners & Subsidiaries will not normally charge you for making an SAR, however, if you make repeated requests for the same information OR the volume of information you are requesting is excessive, Clan Partners & Subsidiaries may be required to charge you a nominal fee for administration of your request. Clan Partners & Subsidiaries can also refuse to comply with your request for the same reasons, but we will always inform you.
- **Right to data portability** – where technically possible, you have a right to have your personal data transferred directly from one organisation to another. However, this does not include having your data passed to another organisation without your knowledge. The data must be supplied in a structured, commonly used and machine-readable form.
- **Right of rectification** – if an organisation holds inaccurate or incomplete data for you, you have the right to request that the organisation corrects this. Any organisation you ask to correct your data should do this within one month. Usually within Clan Partners & Subsidiaries we can rectify most data held instantly, but some things may take slightly longer (i.e. Tax Codes, Bank Details already submitted to Payroll). Your Clan Partners & Subsidiaries Representative will always double check important information with you and will ask whether anything needs to be updated at regular intervals. If you change data that you know Clan Partners & Subsidiaries will require to provide service to you (i.e. telephone, email, bank details etc.) you should inform us as soon as possible.
- **Right to erasure** – this is also known as the ‘**right to be forgotten**’. You can request that the organisation removes all of your personal data. This is not, however, an absolute right. The organisation can retain your data should they have a legal reason for doing so. If you ask Clan Partners & Subsidiaries to erase your data, we may ask you whether you just want to be marked as ‘unavailable’ or ‘not interested’ for a period of time OR whether you want to be permanently deleted.
  - We cannot retain a list of people who have requested permanent deletion; therefore you may still be contacted at a later stage if you remain actively involved in job boards or social media.
  - If you tell Clan Partners & Subsidiaries that you wish your data to be forgotten, Clan Partners & Subsidiaries will be required to contact any third parties we have passed your data to (i.e. Clients or Awarding Bodies) and inform them that you have filed a request to be erased. These third parties must also do the same.
  - Note: Clan Partners & Subsidiaries are required to keep certain records, such as ID, right to work checks, payroll records, health surveillance or training awards, for certain periods of time. These obligations will override any request to erase data or any objections to processing, for so long as we are required to keep the data. We indicate these periods on our Data Inventory and Retention Matrix (included with this Privacy Notice), just so you can be clear that erasure cannot always be instant.
- **Direct marketing** – an organisation MUST have your express consent to send you direct marketing. Therefore, if Clan Partners & Subsidiaries launches any further services other than recruitment or training, we must have your permission to send you information about it.
- **Data breaches** – if an organisation suffers a data breach (e.g. a loss or theft of personal data), they must inform the Information Commissioner’s Office (ICO). If there is a high risk to you, the organisation must also tell you about the breach.

All of your rights as a Data Subject are fully outlined on the [ICO’s website](#), or you can contact your Clan Partners & Subsidiaries Representative or the QHSE Department for further information.

**Who can you contact about Your Personal Data?**

Your first point of contact regarding anything to do with the personal data Clan Partners & Subsidiaries holds about you, is your main point of contact within Clan Partners & Subsidiaries. This may be the Recruitment Specialist you are in contact with, the Trainer or Instructor performing your training course, the Business Support Team who are arranging logistics or training for you. For Internal Staff this will be your Line Manager, or personnel from the Payroll Team. Clan Partners & Subsidiaries will always advise you of whom to contact in the event of a problem.

At all times, you can also contact the Clan Partners & Subsidiaries QHSE Department.

Name: Laura Donald  
Role: QHSE Advisor  
Tel: +44 (0) 1224 356 586  
Email: [laura.donald@clan-partners.com](mailto:laura.donald@clan-partners.com)  
Address: Clan Partners, In-Spec House, Wellheads Drive, Dyce, Aberdeen, AB21 7GQ

If you wish to take the matter further, you can contact the Information Commissioner's Office (the ICO). You can do this via their website ([www.ico.org.uk](http://www.ico.org.uk)), where you have the ability to live chat with someone who will try to address your concerns. You can also call the ICO's helpline on [0303 123 1113](tel:03031231113).

When you contact the ICO, you can use Clan Partners & Subsidiaries' Organisation Reference (ZB148499) to assist you. All organisations processing personal data should be able to supply you with their ICO reference, and you can check that this is valid at any time by searching the ICO's Register of Data Controllers.

**What else can you do to protect Your Personal Data?**

Clan Partners & Subsidiaries' QHSE Handbook will detail some steps you can take as an individual to protect your personal data from unauthorised use or misuse. In our Induction we recommend that when offshore you NEVER save your log-in or password to any social media or internet banking website to any public access computers, and that you fully log out of any session before walking away from the computer. You may wish to consider additional security on your personal electronic devices, including fingerprint ID or PIN codes. You can adjust your internet browser settings to stop accepting text files known as 'cookies' which may be tracking and logging details of your online activities, and remove cookies from your computer, just be aware that some websites and website features, including Clan Partners & Subsidiaries', may not function properly as a result.

Please be aware that this Privacy Notice only applies to Clan Partners & Subsidiaries, our processes, procedures and websites. You should ALWAYS make yourself aware of any Privacy Notice for any other party who may hold your data, including websites that Clan Partners & Subsidiaries may ask you to link to, prior to submitting any data.

**Changes & Updates**

Clan Partners & Subsidiaries keep this Privacy Notice under regular review, and you will be advised of any updates, either by a direct email with a copy of the Privacy Notice OR through our website.



**Steven Dunbar**  
Clan Partners

WHY	WHO	WHAT				WHEN					WHERE		AVAILABLE TO	
		TYPE	SOURCE	CONSENT REQUIREMENT & LEGAL BASIS	PROTOCOL LEVEL	ORIGINALLY	UPDATED	RETENTION PERIOD	RETENTION INFO	EXCEPTIONS	DETERMINED BY	NOW		TO
Performance of Clan Partners Services & Assignee/Candidate Admin	SPECULATIVE RECRUITMENT CANDIDATES	Name Address Contact Details CV Other Application Documents	Individual	No Consent Required (Legitimate Interests (Reasonable Expectation - Provision of Service)) Contact initiated by Data Subject in regards work-finding services	1	First Contact	On Registration	Duration of Purpose	If suitable, progress to interview, if Unsuitable destroy within 7 days	None	Standard Practice	Email Inboxes (Individual, Group), Social Media Portals, Physical Copy		Clan Partners Management Teams, Clan Partners Business Support Team, Clan Partners IT Support, QHSE Department
		Name DOB Address Contact Details CV Certificates & Qualifications Identification (inc. Passport) RTW Documents Health Surveillance Records (inc. OMQ) Bank Account Details	Individual	No Consent Required (Contract / Legal Obligation) Ensure Privacy Notice is supplied and update via record maintenance process	3	At Start of Recruitment Process	As Required	Retained for 6 Years Post-Termination	N/A	Ongoing Dispute / Litigation	Employment / Limitation Law	Manpower (Internal HR file)	Clients (in Tender situations), Training/Logistics Service Providers & Accrediting Bodies	Clan Partners Senior Management, Clan Partners HR Support, Clan Partners QHSE Support, Clan Partners IT Support, External Auditors, Logistics Suppliers, Training Providers, Occupational Health Service Providers, Clan Partners Insurers, Clan Partners Accounts & Payroll, Clan Partners Company Pension Provider, Government Agencies (Data Transfer or Legal Notification)
		References Competency & Performance Records Annual Leave Sickness Absence Tax & NI Details Pension Details Contract	Individual / Third Party Individual / Clan Partners & Subsidiaries Payroll Individual	No Consent Required (Legitimate Interest (Staff Management)) Ensure Privacy Notice is supplied and update via record maintenance process No Consent Required (Contract / Legal Obligation) Ensure Privacy Notice is supplied and update via record maintenance process	3	Pre-Appointment At the Time On Appointment	No As Required	1 Year from date of issue 6 Years Post-Termination	N/A	Ongoing Dispute / Litigation	Employment / Limitation Law Tax / Limitation Law	Manpower (Internal HR file)	Inhouse Accounts / Accounts Service Providers	Clan Partners Senior Management, Clan Partners HR Support, Clan Partners QHSE Support, Clan Partners IT Support, External Auditors, Occupational Health Service Providers, Clan Partners Insurers, Clan Partners Accounts & Payroll, Clan Partners Company Pension Provider, Government Agencies (Data Transfer or Legal Notification)
In Case of Emergency	Emergency Contact (ALL) Next of Kin (ALL)	Name Contact Details	Individual / Third Party	Consent Required (Vital Interests) - Note - this is requested from the candidate/Staff member who will be provided to ensure consent has been given to them by the person names as EC/NOK	1	Pre-Mobilisation / On Appointment	As Required	Delete on Termination	N/A	None	No Business Requirement - Moral Obligation	Type dependent - Recruitment Systems, Internal HR file, Training Candidate file	Clan Partners Management Team, Clan Partners Business Support, Clan Partners QHSE Clan Partners Senior Management (Internal Staff)	
Performance of Clan Partners Services	Client Companies (Existing)	Registered Name Registered Address Operations Address(es) Company Registration VAT Details Bank Account Policies & Procedures	Individual	No Consent Required (Legitimate Interest (Performance of Service)) Ensure Privacy Notice is supplied and update via record maintenance process	3	First Contact On Agreement to Provide Service	As Required	6 Years Post End of Relationship	N/A	Ongoing Litigation	The Companies Act / Limitation Law	Recruitment Systems	Accounts System, Service Provider	
	Client Contacts (Existing)	Name Title Work Address Work Email Work Mobile Work Phone	Individual	No Consent Required (Legitimate Interest (Performance of Service)) Ensure Privacy Notice is supplied and update via record maintenance process	3	First Contact	As Required	End of Relationship	It is a reasonable expectation that Clients with whom there is an ongoing business relationship will maintain communication regarding work-based data and updates to this data as required. Clan Partners & Subsidiaries shall deactivate Client Contacts who leave the Client organisation, Contacts who move to a different Client	Ongoing Litigation	GDPR	Recruitment Systems	Type dependent - If Invoice Contact transferred to Accounts System / Service Provider	
Records of Previous Performed Services	Client Companies (Former)	Registered Name Registered Address Operations Address(es) Company Registration VAT Details Bank Account Policies & Procedures	Individual	No Consent Required (Legitimate Interest (Performance of Service)) Ensure Privacy Notice is supplied and update via record maintenance process	3	First Contact On Agreement to Provide Service	No	6 Years Post End of Relationship	N/A	Ongoing Litigation	The Companies Act / Limitation Law	Recruitment Systems	Accounts System, Accounts Service Provider	
	Client Contacts (Former)	Name Title Work Address Work Email Work Mobile Work Phone	Individual	No Consent Required (Legitimate Interest (Performance of Service)) Ensure Privacy Notice is supplied and update via record maintenance process	3	First Contact	No	End of Relationship	It is a reasonable expectation that Clients with whom there is an ongoing business relationship will maintain communication regarding work-based data and updates to this data as required. Clan Partners & Subsidiaries shall deactivate Client Contacts who leave the Client organisation, Contacts who move to a different Client	Ongoing Litigation	GDPR	Recruitment Systems	Type dependent - If Invoice Contact transferred to Accounts System / Service Provider	Clan Partners Accounts, Clan Partners IT Support, Clan Partners QHSE Support, Clan Partners Insurers, External Auditors, Government Agencies
Marketing Activity	Client Companies (Potential)	Registered Name Registered Address Operations Address(es) Company Registration	Internet / Social Media / Third Party List	No Consent Required (Legitimate Interest (Performance of Service)) Ensure Privacy Notice is supplied and update via record maintenance process	3	Introduction by Third Party / Business Development Activity / Association Membership / FPAL	As Required	Upon Consent Withdrawal	N/A	None	GDPR	Email Inboxes (Individual, Group), Social Media Portals, Physical Copy (Business Card)	Recruitment Systems	
	Client Contacts (Potential)	Name Title Work Address Work Email Work Mobile Work Phone	Internet / Social Media / Third Party List	No Consent Required (Legitimate Interest (Performance of Service)) Ensure Privacy Notice is supplied and update via record maintenance process	3	Introduction by Third Party / Business Development Activity / Association Membership / FPAL	As Required	Upon Consent Withdrawal	N/A	None	GDPR	Email Inboxes (Individual, Group), Social Media Portals, Physical Copy (Business Card)	Recruitment Systems	
Performance of Service to Clan Partners	Suppliers	Registered Name Registered Address Operations Address(es) Company Registration VAT Details Bank Account Insurances Supplier Contact Name(s) Work Address Work Email Work Mobile Work Phone Policies & Procedures Complaints/Non-Conformance Information	Individual / Internet / Third Party List (Companies House / VIES)	No Consent Required (Legitimate Interest (Provision of Service / Control of Approved Suppliers)) Ensure Privacy Notice is supplied and update via record maintenance process	3	Prior to Engagement to Provide Services/Products (Approved Supplier Process)	As Required (Min. Annually from creation, as long as relationship exists)	End of Relationship 6 Years after End of relationship	N/A	Ongoing Litigation / Safety Critical Supply	Business Requirement	Email Inboxes, Recruitment Systems, W:Manpower/Approved Supplier List	Purchasing System, Accounts System, Accounts Service Provider	