



High Performance Robotics

Privacy Policy

This Privacy Policy explains what HPR (UK) Ltd and HPR ROV Ltd do with your personal data, whether we are in the process of helping you find work, continuing our relationship with you, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our Candidates, or you are visiting our website.

This privacy policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you.

This privacy policy applies to the personal data of our Website Users, Candidates, Clients, Suppliers, and other people whom we may contact in order to find out more about our Candidates or whom they indicate is an emergency contact.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) replaces the Data Protection Regulation (Directive 95/46/EC) from 25 May 2018. 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. Even though the UK has expressed its intention to leave the EU in March 2019, the GDPR will be applicable in the UK from 25th May 2018.

WHO WE ARE, WHAT WE DO AND HOW WE GET YOUR DATA

HPR ROV Ltd is a recruitment agency and recruitment business as defined in the Employment Agencies Act 1973 (our business). We also provide consultancy services from time to time. HPR ROV Ltd, provide ROV technical support services including personnel to operate Remotely Operated Vehicles and ancillary equipment. We collect the personal data from the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts (including referee contacts provided by candidates);
- Supplier contacts to support our services;
- Employees, consultants, temporary workers and contractors;

You may have applied directly to us or we may have found your details from a jobs board or social networking site. We are able to process your data if we have a legal basis for doing so. There are six legal bases for processing data but we will rely on (1) your consent to send direct marketing messages about services other than our recruitment services, (2) that the processing is necessary for the performance of a

contract with you, or (3) that we have a legitimate interest in processing your personal data.

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

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”), the company responsible for your personal data is HPR ROV Ltd (referred to here as “HPR ROV” or “HPR” or “us”).

WHAT IS PERSONAL DATA?

Personal data is data that can identify you as a living individual. There is general personal data such as name, address, National Insurance number and online identifiers/location data. There is also sensitive personal data which 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.

WHAT KIND OF PERSONAL DATA DO WE COLLECT?

Candidates:

In order to provide the best possible work or employment opportunities that are suited to you and your skill set, we need to process certain information about you. We only ask for information that will actually help us to help you.

Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you work or employment opportunities which are relevant to you. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- Name;
- Age/date of birth;
- Sex/gender;
- Photograph;
- Marital status;
- Contact details; (address, telephone numbers, email addresses, Voip address, etc)
- Parent details; (full name and place of address)
- Education details;
 - Survival and medical certificates
 - Seaman Card and Discharge Book details
 - Vantage number
 - Mist Certificate
 - Preferred Airport

- Educations and Training Certificates
- Curriculum Vitae
- Vaccination Certificates
- Visas
- Limited Company details
- Employment history;
- Bi-Deltoid information;
- Emergency contacts and details of any dependants;
- Referee details;
- Immigration status (whether you need a work permit);
- Nationality/citizenship/place of birth;
- A copy of your driving licence and/or passport/identity card;
- Financial information (bank details if we have secured work for you);
- National Insurance number (or equivalent in your country) and any other tax-related information;
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- Details of any criminal convictions if this is required for a role that you are interested in applying for;
- Details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future work or employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- Extra information that you choose to tell us;
- Extra information that your referees choose to tell us about you;
- Extra information that our Clients may tell us about you, or that we find from other third party sources, such as job sites;
- IP address; and
- The dates, times and frequency with which you access our services;

*Please note that the above list of categories of personal data we may collect is not exhaustive.

Clients:

We usually only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers, email addresses and company physical address) to ensure that our relationship runs smoothly.

We use information about you, or individuals at your organisation, in the course of providing you services such as finding Candidates who are the right fit for you or your organisation.

Suppliers:

Usually all we require is contact details of relevant individuals at your organisation so that we can communicate with you, such as names, telephone numbers and email

addresses. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

Other Users, such as Referees and Emergency Contacts:

In order to provide Candidates and Staff with suitable work or employment opportunities, we require some basic background information (such as name, email address and telephone number). We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our Candidates or Staff members.

Website Users:

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from and the times that our website is most popular.

HOW DO WE COLLECT YOUR PERSONAL DATA?

Candidates:

There are two main ways in which we collect your personal data:

- Directly from you; and
- From third parties

Via the below methods:

- Personal data that you, the Candidate, gives to us;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

Personal data you give to us:

We need to know certain information about you in order to provide a service customised to your requirements. This will enable us to provide you with the best opportunities and should, therefore, save you time by not hearing about roles that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on the HPR website;
- Emailing your CV and certificates to an HPR consultant, or being interviewed by them;

- Applying for jobs through a job boards; which HPR use to advertise their roles; and

PERSONAL DATA WE RECEIVE FROM OTHER SOURCES

We also receive personal data about Candidates from other sources. Depending on the relevant circumstances, these may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- Our Clients may share personal information about you;
- While searching for potential Candidates we may obtain information about you from third party sources, such as LinkedIn and other job sites;
- If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites.

PERSONAL DATA WE COLLECT AUTOMATICALLY

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

Candidates:

There are two main ways in which we collect your personal data:

- Directly from you; and
- From third parties (e.g. our Candidates) and other limited sources (e.g. online and offline media).

Clients:

We collect personal data in three ways:

- Personal data that we receive directly from you;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

Personal data that we receive directly from you:

We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Personal data we receive from other sources:

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources, generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).

Other Users, such as Referees and Emergency Contacts:

We collect your contact details only where a Candidate or a member of our Staff puts you down as their emergency contact or as a referee.

Website Users:

We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. When you visit our website, there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date, times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

HOW DO WE USE YOUR PERSONAL DATA?

Candidates:

The main reason for using your personal details is to help you find work or employment that may be suitable for you. The more information we have about you, your skillset and your ambitions, the better we can customise our services to you. We may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake these activities.

We generally use Candidate data in four ways:

- Recruitment Activities;
- Marketing Activities;
- Equal Opportunities Monitoring; and
- To help us to establish, exercise or defend legal claims.

Recruitment Activities:

Obviously, our main area of work is freelance placement – connecting the right Candidates with the right work opportunities. We've listed below various ways in which we may use and process your personal data for this purpose.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you for opportunities which we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between HPR and third parties in relation to your recruitment;
- Facilitating our payroll and invoicing processes;
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

*Please note that this list is not exhaustive.

Marketing Activities:

We may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates for opportunities. In particular, we may wish to use your data for the purposes listed below to:

- enable us to develop and market our services;
- market our full range of recruitment services (permanent, temporary, contract and outplacement) to you;

*Please note that this list is not exhaustive.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in.

EQUAL OPPORTUNITIES MONITORING AND OTHER SENSITIVE PERSONAL DATA

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of “diversity information”. This could be information about your ethnic background, gender, disability, age and/or religion or other similar beliefs. We may also disclose this (suitably anonymised where relevant) data to

Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their recruitment processes.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions, if this is appropriate and is required for a role that you are interested in applying for. We will never do this without your explicit consent.

Profiling:

Although at present all our recruitment activities involve human-decision making during the process, we may in the future use fully automated technologies such as expert systems or machine learning to complete a Candidate selection process from end-to-end, where appropriate and in accordance with any local laws and requirements.

Where appropriate, we will seek your consent to carry out some or all of these activities. If you do not provide consent to profiling, your application will continue to be reviewed manually for opportunities you apply for, but your profile will not be automatically considered for alternative roles. This is likely to decrease the likelihood of us successfully finding you work.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Candidates:

We may share your personal data with various parties, in various ways and for various reasons. We will share your information with Clients to increase your chances of securing work for you. Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

Clients:

We will share your data to ensure that we provide you with a suitable pool of Candidates.

Suppliers:

Unless you specify otherwise, we may share your information with any of our group companies and associated third parties, such as our service providers, and organisations to whom we provide services.

Where appropriate, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies;
- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding work or employment;
- In the case of Candidates: third party partners and job boards where we consider this will improve the chances of finding you work;
- In the case of Candidates and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate.

HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information, please let us know immediately.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will delete your personal data from our systems if we have not had substantial contact with you (or, where appropriate, the company you are working for or with) for a period of five years.

We will delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those Candidates whose services are provided via a third party company or other entity, “substantial contact” with you means substantial contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than five years from that point or, if later, for the period of five years from the point we subsequently have substantial contact directly with you.

When we refer to “substantial contact”, we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a Candidate we will consider there to be substantial contact with you if you submit your updated CV onto our website. We will also consider it substantial contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as substantial contact – this will only occur in cases where you click-through or reply directly.

HOW CAN YOU ACCESS, AMEND OR WITHDRAW THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

GDPR’s main objective is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy.

This means that you retain various rights in respect of your data, even once you have given it to us, as detailed below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled).

*Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object:

- If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- This right enables you to object to us processing your personal data where we do so for one of the following four reasons:

- our legitimate interests;
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; and
- for scientific, historical, research, or statistical purposes.
- The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Website Users, Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
 - We can show that we have compelling legitimate grounds for processing which overrides your interests; or
 - We are processing your data for the establishment, exercise or defence of a legal claim.
 - If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent:

Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market you, you may withdraw your consent at any time and we will cease to carry out the particular activity that you previously consented to, unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

Data Access Requests:

You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is “manifestly unfounded or excessive”. If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always inform you of the reasons for doing so.

Right to remove:

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “remove” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you

being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Normally, the information must meet one of the following criteria:

- the data is no longer necessary for the purpose for which we originally collected and/or processed it;
- where previously given, you have withdrawn your consent to us processing your data and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with GDPR);
- it is necessary for the data to be deleted in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations (e.g. tax, audit, or other authorities) or for the performance of a public interest task or exercise of official authority;
- for public health interest reasons;
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

When complying with a valid request for the removal of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing:

You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either:

- one of the circumstances listed below is resolved;
- you consent; or
- further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;

- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification:

You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

OUR LEGAL BASES FOR PROCESSING YOUR DATA

Legitimate Interests:

Article 6(1)(f) of the GDPR states that we can process your data where it “is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.”

None of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service! However, you do have the right to object to us processing your personal data on this basis.

Candidates:

We think it’s reasonable to expect that if you are looking for work or employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies.

Once you reach the final stages and you may get the job, the Client or your prospective employer may also want to double check any information you’ve given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is

appropriate. We need to do these things so that we can function as a profit-making business and to help you and other Candidates get the work you deserve.

We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

We have our own obligations under the law. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

Clients:

To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation, as well as keeping records of our conversations, meetings, registered jobs and placements.

Suppliers:

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

Other Users, such as Referees and Emergency Contacts:

If you have been nominated by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary as an organisation offering recruitment services and employing people.

If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency.

WHAT ARE COOKIES AND HOW DO WE USE THEM?

A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity and to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all, or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

Cookies can also be categorised as follows:

- **Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when applying for work, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that can be customised. They may also be used to provide services you have requested, such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

DATA SECURITY AND CONFIDENTIALITY

It is our policy to ensure, in so far as is reasonably practicable, that our systems and records are secure and not accessible to unauthorised third parties in line with contemporary practice.

COMPLAINTS PROCESS

If you have a complaint about how we have handled your personal information you may contact us using the details below.

UPDATES

We keep this Policy under regular review and update it from time to time. Please review this policy periodically for changes.

CONTACT

The Data Controller is HPR ROV Limited a company registered in the UK. Company Number SC171672.

Address: Waterside Court, Oyne, Inch, Aberdeenshire, AB52 6RS.

In respect of this policy you can contact HPR at hpr.gdpr.data.controller@hpruk.com

You can call HPR on 01464 851122.

Please note we will only use your information in accordance with this Policy, or where we are required or authorised by law to disclose your information to others, or where we have your permission to disclose your information to others