

## Innospec Inc

### Applicant Privacy Notice

#### **THIS POLICY APPLIES TO ALL INNOSPEC INC GROUP COMPANIES, OFFICES AND EMPLOYEES OPERATING IN THE EUROPEAN ECONOMIC AREA (EEA)**

#### **1. What is this document and why should you read it?**

- 1.1 This privacy notice explains how and why Innospec Inc including each of its operating entities in the EEA (also referred to as "**Innospec**", "**we**", "**our**" and "**us**") uses personal data about individuals who apply to work with us either as employees, staff, contractors, trainees or consultants (referred to as "**you**").
- 1.2 You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future. There is a separate Employee Privacy Notice that will apply to you if you are offered employment or engagement by Innospec.
- 1.3 This notice does not form part of any contract of employment or any other contract to provide services.

#### **2. Innospec's data protection responsibilities**

- 2.1 "**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details and CV are all examples of your personal data, if they identify you.
- 2.2 The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- 2.3 Innospec is a "**controller**" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

#### **3. What types of personal data do we collect and where do we get it from?**

- 3.1 We collect different types of personal data about you for various reasons. We cannot administer your application for employment or engagement without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our application processes are optional and can be left blank.
- 3.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.
- 3.3 You provide us with personal data directly when you apply for a job with us. We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including recruitment agents, some public sources, such as publically available directories and online resources, your emergency contacts and former employers. You can read more about the sources of personal data in the more detailed information set out in as explained in **Schedule 1**.
- 3.4 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting the HR department or your recruitment contact.

#### **4. What do we do with your personal data, and why?**

- 4.1 We process your personal data for particular purposes in connection with your application for employment or engagement with us, and the management and administration of our business.
- 4.2 We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. There are **six** such permitted lawful basis for processing personal data.

The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

4.3 Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:

4.3.1 necessary for us to comply with a legal obligation; or

4.3.2 necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it

and you choose not to provide the relevant personal data to us, we may not be able to enter into a contract of employment or engagement with you.

4.4 We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our applicants have certain protected characteristics for equal opportunities monitoring.

## 5. **Special category personal data (including criminal data)**

5.1 We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and different lawful bases apply to them. The table at **Schedule 3** sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

## 6. **Who do we share your personal data with, and why?**

6.1 Sometimes we need to disclose your personal data to other people.

### *Inside the Innospec group*

6.2 We are part of the Innospec group of companies. Therefore, we will need to share your personal data with other companies in the Innospec group for our general business and workforce management purposes, for line management purposes, incident and accident reporting, authorisations/approvals with relevant decision makers, parental reporting and where systems and services are provided on a shared basis.

6.3 Access rights between members of the Innospec group are limited and granted only on a need to know basis, depending on job functions and roles.

6.4 Where any Innospec group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

### *Outside the Innospec group*

6.5 From time to time we ask third parties to carry out certain business functions for us, such as recruitment agencies, cloud data storage and IT support. These third parties will process your personal data on our behalf (as our processor or joint controller). We may disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

6.6 We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

6.6.1 consultants and professional advisors including legal advisors and accountants;

- 6.6.2 medical screening and occupational health provision;
- 6.6.3 background check providers;
- 6.6.4 business partners and joint ventures;
- 6.6.5 trade associations and professional bodies;
- 6.6.6 governmental departments, statutory and regulatory.

We may also share your personal data with third parties, as directed by you.

## 7. **Where in the world is your personal data transferred to?**

- 7.1 If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:
- 7.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
  - 7.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
  - 7.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
  - 7.1.4 you explicitly consent to the transfer.

## 8. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. For more information, please request a copy of our Group IT Security Policy from the HR department or your recruitment contact.

## 9. **How long do we keep your personal data for?**

- 9.1 We will keep your personal data for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.
- 9.2 We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:
- 9.2.1 any laws or regulations that we are required to follow;
  - 9.2.2 whether we are in a legal or other type of dispute with each other or any third party;
  - 9.2.3 the type of information that we hold about you; and
  - 9.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.
- 9.3 Specific retention periods for certain documents are set out below:

Application Forms / CVs	<p>If your application is unsuccessful, these documents will usually be retained for one year after the successful candidate commences employment.</p> <p>However, if the successful candidate requires specific visa or other sponsorship then the retention period (in respect of both application forms, CVs and other documents) will be longer in relation to those candidates shortlisted for interview and will need to be in line with our sponsor obligations.</p>
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	If your application is successful, these documents will be retained for 7 years following the end of your employment.
References received	References received from former employers will be retained for one year after the successful candidate commences employment and for 7 years following the end of your employment if you are the successful candidate.
Criminal Record Checks	<p>For roles requiring a standard or enhanced criminal record check, the results will be retained for the duration of employment and any subsequent period required by the relevant authority / regulations under which the check has been conducted.</p> <p>For roles requiring a basic criminal record check, this data will be retained until the successful candidate commences employment (unless we have a contractual obligation with a customer or other third party to retain this for longer). A note will be maintained on file for the duration of employment that the check results were satisfactory.</p> <p>If the successful candidate requires specific visa or other sponsorship and a criminal record check is a requirement of the role then the criminal record check will be maintained in accordance with the sponsor obligations referred to above.</p>

9.4 If you are successful in your application, the retention provisions set out in our Employee Privacy Notice will apply to your personal data.

## 10. **What are your rights in relation to your personal data and how can you exercise them?**

10.1 You have certain legal rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

10.2 Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

10.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

10.4 If you wish to exercise any of your rights please contact the HR department or your recruitment contact in the first instance.

10.5 You also have the right to lodge a complaint with the relevant data protection supervisory authority for the country location of the role that you have applied for.

## 11. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by updating the version of this notice held on our website. We encourage you to check this notice on a regular basis.

## 12. **Where can you find out more?**

12.1 If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, please contact the HR department or your recruitment contact.

## SCHEDULE 1

### Categories of personal data

Type of personal data	Collected from
<b>a) Contact Information</b>	
<ul style="list-style-type: none"> <li>• Name(s)</li> <li>• Address(es)</li> <li>• Email address(es)</li> <li>• Contact details including mobile telephone number(s)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>
<b>b) Personal Information</b>	
<ul style="list-style-type: none"> <li>• Date of birth</li> <li>• Gender</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>
<b>c) Identity and Background Information</b>	
<ul style="list-style-type: none"> <li>• Details of education and qualifications and results</li> <li>• Career history, experience and skills</li> <li>• Passport information</li> <li>• Driving licence information</li> <li>• Psychometric test results</li> <li>• Right to work, residency and/or other visa information</li> <li>• Curriculum Vitae (CV) or resume and professional profile</li> <li>• Image or photographs</li> <li>• Application form</li> <li>• Evaluative notes and decisions from job interviews</li> <li>• References</li> <li>• Preferences relating to job location and salary</li> <li>• Background check reports including (where applicable) bankruptcy, 10 year activity and gap verification, adverse media search, civil litigation (through legal publication search), CV discrepancy and credential verification</li> <li>• Conflicts of interests (including where related to family networks)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Recruitment consultants and agencies</li> <li>• Your previous employers</li> <li>• Publically available information from online resources</li> <li>• Third party background check providers</li> </ul>
<b>d) Special Category Personal Data</b>	
<ul style="list-style-type: none"> <li>• Racial or ethnic origin (including your nationality and visa information)</li> <li>• Religious or philosophical beliefs</li> <li>• Data concerning physical and/or mental health (including pre-employment screening, occupational health requirements and health surveillance, risk assessments, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results)</li> <li>• Criminal records checks and information relating to actual or suspected criminal convictions and offences</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Your emergency contact(s)</li> <li>• Your use of Innospec security control systems</li> </ul>
<b>e) Security, Location and Access Information</b>	
<ul style="list-style-type: none"> <li>• Information (including image data) captured or recorded by electronic card access systems, CCTV and other security control systems</li> <li>• Dates of visits to UK sites</li> <li>• Time in / out records</li> <li>• Car registration, make and model</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Your use of Innospec security control systems</li> <li>• Records held at on-site reception</li> </ul>

## SCHEDULE 2

### Purposes of processing personal data

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing	Categories of personal data <sup>1</sup> (see schedule 1)	Lawful basis				
		We are permitted to process your personal data because...				
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)
<b>a) Recruitment and workforce planning</b>						
1. Administering your application for a job with us and considering your suitability for the relevant role	a, c				✓	
2. Obtaining, considering and verifying your employment references and employment history	a, c				✓	
3. Reviewing and confirming your right to work in the relevant employment base location.	a, c			✓		
4. Conducting verification and vetting, including criminal background checks and credit checks where required by law ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a, c, d			✓		
5. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a, c, d	✓				
6. Making a job offer to you and entering into a contract of employment with you	a, c		✓			
7. Analysing recruitment and retention objectives, processes and employee turnover rates	a, b, c, d				✓	
8. Developing, operating and collecting feedback on recruitment activities and employee selection	a, b, c, d				✓	

Purposes of processing	Categories of personal data <sup>1</sup> (see schedule 1)	Lawful basis				
		We are permitted to process your personal data because...				
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)
processes						
<b>b) General employment management and administration</b>						
9. Communicating with you and providing you with information in connection with your potential employment or engagement with us	a		✓		✓	✓
10. Determining whether any adjustments are necessary to enable you to carry out your role ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a, b, d		✓	✓		
11. Preparing risk assessments to prevent future injuries in the workplace	a, d			✓		
<b>c) Security and governance</b>						
12. Monitoring the security of Innospec's physical premises and systems, networks and applications	e			✓	✓	
<b>d) Legal and regulatory compliance and responsibilities</b>						
13. Managing and administering our equal opportunities reporting ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a, b, d			✓		
14. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a – e (inclusive)			✓		
15. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities	a – e (inclusive)				✓	
16. Complying with disclosure orders arising in civil proceedings ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a – e (inclusive)			✓		
17. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting	a – e (inclusive)			✓		

Purposes of processing	Categories of personal data <sup>1</sup> (see schedule 1)	Lawful basis				
		We are permitted to process your personal data because...				
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)
Innospec's compliance with relevant legal and regulatory requirements ( <b>Note:</b> special category personal data <b>paragraph 5</b> )						
18. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Innospec's compliance with best practice and good governance responsibilities	a – e (inclusive)				✓	
19. Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes ( <b>Note:</b> special category personal data <b>paragraph 5</b> )	a – e (inclusive)			✓	✓	



### SCHEDULE 3

#### Purposes of processing special category personal data

Purposes of processing	Special category lawful basis We are permitted to process your personal data because...					
	1. You have given <b>your explicit consent</b> to the processing	2. It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	3. It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of <b>legal claims</b>	5. It is necessary for reasons of <b>substantial public interest</b>	6. It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
<b>a) Recruitment and workforce planning</b>						
1. Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
<b>b) General employment management and administration</b>						
3. Determining whether any adjustments are necessary to enable you to carry out your role		✓				
<b>c) Legal and regulatory compliance and responsibilities</b>						
4. Managing and administering our equal opportunities reporting					✓	
5. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the				✓		

Purposes of processing	Special category lawful basis					
	We are permitted to process your personal data because...					
	1. You have given <b>your explicit consent</b> to the processing	2. It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	3. It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of <b>legal claims</b>	5. It is necessary for reasons of <b>substantial public interest</b>	6. It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee

- same
- 6. Complying with disclosure orders arising in civil proceedings
- 7. Investigating, evaluating, demonstrating, monitoring, improving and reporting on Innospec's compliance with relevant legal and regulatory requirements
- 8. Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes
- 9. Making reasonable adjustments as needed to help remove barriers faced by you in your role because of any disability you might have

✓

✓

✓

✓

## SCHEDULE 4

### Your rights in relation to personal data

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (ie not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
<b>Right to withdrawal of consent</b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.