



## **PRIVACY NOTICE (AMERICA & CANADA)**

Effective Date: June 2022

LSP Renewables Inc. ("LSP") are committed to protecting and respecting your privacy. Your personal data and privacy matters. Personal data means any information about an individual from which that person can be identified.

This notice together with our terms of use [www.lsprenewables.com] sets out the basis on which any personal data LSP collect from you, or that you provide to us, will be processed by us.

LSP Renewables Inc. is part of a group of affiliated companies located around the world.

This Privacy Policy describes how LSP collects, uses, shares, and secures personal information LSP collect through the websites that link to this Privacy Policy from and about clients, candidates, and contractors in the United States and Canada to provide services to or concerning them and applies to:

- Website Users – any individual visitors to, and users of, LSP's websites whose personal data is collected by LSP in the course of the Website Users' use and navigation around our website;
- Candidates – applicants for any type of job or engagement via LSP whose personal data is collected in the course of our services;
- Professional and employment-related information (such as resume, compensation and background check results [that you have authorized us to obtain]);
- Financial information such as bank account information, tax status etc.;
- Identifiers (such as your name, contact information, social security/insurance number, emergency contacts, and references) and/or
- Corporate Staff – individuals who work for, or are engaged by, LSP's customers, clients, or suppliers whose personal data is collected in the course of our work with them.

By using our services, you accept the terms of this Privacy Policy and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy. If you do not agree with any part of this Privacy Policy, then please do not use any of our services.

### **Who Are LSP? What Do We Do?**

LSP are a staffing/recruitment company who collect the personal data of the following types of people to allow LSP to undertake our business;

- Prospective and placed candidates for permanent and/or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services and
- Employees, consultants, temporary workers.

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

### **Information You Give to LSP Or We Collect About You.**

This is information about you that you give LSP by filling in forms on our site (www.lsprenewables.com) or by corresponding with LSP by telephone, e-mail or otherwise. It includes information you provide when you register to use LSP's website, to enter our database, subscribe to our services, participate in discussion boards or other social media functions and when you report a problem with our site.

The information you give to LSP or LSP collects about you may include your name, address, private and corporate e-mail address and telephone number, financial information, compliance documentation and references verifying your qualifications and experience



and your right to work, resume and photograph, links to your professional profiles available where you have shared your data in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

### **Information LSP Obtains from Other Sources.**

This is information LSP obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online resume libraries, your business card and personal recommendations. In this case, LSP will inform you, by sending you this privacy notice of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

LSP are working closely with third parties including companies within our Group, business partners, clients of LSP, sub-contractors and professional advisors. LSP may receive information about you from them for the purposes of our staffing/recruitment services.

### **Purposes of the processing and the legal basis for the processing**

LSP use information held about you in the following ways:

To carry out our obligations in determining your suitability for the particular position and if applicable, arising from any contracts we intend to enter into or have entered into between you and LSP and to provide you with the information and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organization.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary and/or permanent engagement/s. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate interests, described in more detail below, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

LSP will rely on contractual obligations if we are negotiating or have entered into an agreement with you or your organization or any other contract to provide services to you or receive services from you or your organization.

LSP will rely on legal obligation in some cases, where we are required by law or regulation to process your data.

LSP will in some circumstances rely on consent for particular uses of your data. Where LSP rely on consent, you will be asked for your express consent. An example of when we will rely on consent as the legal basis for processing your data is when we process your data for marketing purposes.

### **LSP's Legitimate Interests**

LSP's legitimate interests in collecting and retaining your personal data is described below:

As a staffing/recruitment company, we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data. The database will contain historical information as well as current resourcing requirements.



To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

### **Consent**

Should LSP want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

### **Other Uses LSP Will Make of Your Data:**

LSP does not undertake automated decision making or profiling. We use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

### **Do You Have to Provide LSP With Personal Data?**

You may refuse to give LSP your personal and sensitive personal data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

### **Disclosure of Your Information Outside of North America**

#### **International Data Transfers**

You understand that we may transfer your personal information to the United Kingdom, elsewhere in Europe, and other locations outside of the US and Canada, to the extent permissible under applicable law and as such, your personal information may be subject to privacy laws in other jurisdictions. By providing your information and through your use of the Websites, and to the extent permissible under applicable law, you consent to such international data transfers and processing in accordance with this Privacy Policy and applicable law.

LSP may share your personal information within the LSP group of companies for commercial and business purposes to enable us to provide you with the best service possible and with selected third parties including:

- Clients for the purpose of introducing candidates to them;
- Candidates for the purpose of arranging interviews and engagements;
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- Subcontractors including payment and other financial service providers;
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

LSP will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If LSP or substantially all of its assets are acquired by a third party, in which case personal data held by LSP about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of LSP, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- As required to pursue available remedies or limit damages we may sustain.



The lawful basis for the third-party processing will include:

- Their own legitimate interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

### **How Does LSP Secure Personal Information**

LSP strives to process your information securely, in accordance with this Privacy Policy, and in accordance with information security requirements imposed by applicable law. We cannot, however, be responsible for internet communications, which are inherently not completely secure.

If you suspect any unauthorized access to or misuse or loss of your personal information, please contact us immediately.

### **Retention Of Your Data**

LSP understands our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate interests and that you are happy for us to do so. Different laws require LSP to keep different data for different periods of time.

LSP must also keep your records of payments to you or an intermediary for as long as is legally required.

Where LSP has obtained your consent to process your personal/sensitive personal data we will do so in line with our retention policy. Where consent is not granted, LSP will cease to process your personal data and sensitive personal data.

- Your resume and associated data (when we have not found work for you) - 5 years from the date of our last contact.
- Your resume and associated data (when we have found temporary work for you) – 6 years from the last date of payment.
- Your resume and associated data (when we have found permanent work for you) – 5 years from the date of our last contact.

LSP do the following to try to ensure that the data we hold on to you is accurate:

- Prior to making an introduction we check that we have accurate information about you and we keep in touch with you so you can let us know of changes to your personal data.
- We segregate our data so that we keep different types of data for different time periods.

The criteria we use to determine whether we should retain your personal data include:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our staffing/recruitment expertise and knowledge of the industry by country, sector and job role.

We may store and handle your data in the following ways:

- We may archive part or all of your personal data, retain it on our financial systems only or delete all or part of the data from our main Customer Relationship Manager (CRM) system.
- We may pseudonymize parts of your data, particularly following a request for restriction or erasure of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymized Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.



### **Privacy Rights Where You Live**

You may have certain legal privacy rights where you live, and we will comply with restrictions and requests as required by applicable law.

California Privacy Rights: If you are a California resident, we do not “sell” your personal information (as defined by California Civil Code §1798.83) that we collect on the Websites with third parties for their own marketing purposes.

### **Marketing**

Any information that you choose to give to LSP will not be used for marketing purposes by us. LSP will hold your personal information only for the purposes of providing to you our business services.

### **Your Rights**

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Governing Law.**

This Privacy Policy shall be governed by and construed in accordance with the laws of the District of Dallas, Texas. If any part of this Privacy Policy is determined to be invalid or unenforceable pursuant to applicable law, then the invalid or unenforceable provision or part will be deemed suspended by a valid, enforceable provision that most closely matches the intent of the original provision or part, and the remainder of this Privacy Policy shall continue in full force and effect.

Contact Us. For any other information, please contact us at: [privacy@lsprenewables.com](mailto:privacy@lsprenewables.com)

### **Changes to LSP's privacy notice**

Any changes we make to our privacy notice in the future will be posted on this page. We will not make retroactive changes that reduce your privacy rights unless we are legally required to do so. Your continued use of the services after the Effective Date constitutes your acceptance of the emended Privacy Policy. The amended Privacy Policy supersedes all previous versions. This Privacy Policy was last updated in June 2022.

### **Legal Disclaimer**

LSP Renewables Limited (“LSP”) has taken, and will continue to take care in the development, preparation and maintenance of the content for the LSP website. LSP will use its reasonable endeavours to ensure only accurate information is posted on its website.

However, LSP shall not be under any duty nor does it guarantee or warrant the accuracy or reliability of any information, content or materials in this site and/or that such content is up to date. LSP shall not be liable for any losses as a result of reliance on information provided. The content of this web site may be changed at any time without notice.

LSP expressly excludes any and all liability for errors or omissions with respect to the content and the website, save to the extent that such liability arises from LSP's fraud or fraudulent misrepresentation or from any death or personal injury that arises due to our negligence. LSP accepts no responsibility for any loss or damage whatsoever resulting from reliance on any statements contained in this website. The information provided on this website is provided without any warranty of any kind, either express or implied.

While LSP uses reasonable efforts to obtain information from sources which it believes to be reliable, it makes no representation that the information or opinions contained on the website, or associated links to the website, are accurate, reliable or complete.



LSP does not warrant that the functions contained in the site will be uninterrupted or error-free, that defects will be corrected, that the site or any server that makes it available is free from viruses or other harmful components, or that successful or accurate results or outcomes will result from your use of this site. Access to the website is permitted on a temporary basis, and LSP reserve the right to withdraw or amend the content provided on the website without Notice. LSP are not under any duty to make the website available and will not be liable if for any reason the website is unavailable, totally or partially, at any time or for any period.

LSP does not guarantee that any client will offer any candidate an interview or respond to the candidate's submission of their information. The website does not constitute or purport to constitute a source of advice or a means to establish a business relationship of any kind between you and LSP.

### **Terms and Conditions for use of this website**

By accessing the website, you acknowledge and expressly accept that your use of the website is made under your sole and exclusive responsibility and agree that you will not perform any acts that may damage LSP's image, interests or rights or those of any of LSP's affiliates, or that may damage, render useless or overload the website, or that may impede, in any way, the normal use of the website by other visitors.

You agree to use this website for lawful purposes only and in a manner which is consistent with any and all applicable law and regulation in the country in which you access this site. You agree not to import or transfer to this site either directly or indirectly any information or other content which is or may be inaccurate, misleading, defamatory, obscene or offensive or in breach of any intellectual property right or similar right or damaging to the software or performance of this site.

Unless otherwise stated, all rights, including copyright and database rights, in this site and its contents are owned by (or licensed to) LSP or otherwise used by LSP as permitted by applicable law.

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