



## **COOL COMPANY LTD.**

### **RECRUITMENT PRIVACY NOTICE - CREW**

Adopted 10 November 2023

#### **I. OVERVIEW**

Cool Company Ltd, together with its subsidiaries and affiliates ("**CoolCo**" or "**we**"/"**us**") is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You have received a copy of this recruitment privacy notice (the "**Notice**") because you have applied for a crew position with us and we have received your personal information.

This Notice describes what we do with personal information we collect from you during the recruitment process, the ways in which we may collect that information and how long information will usually be retained for.

#### **II. DATA PROTECTION PRINCIPLES**

We will comply with applicable data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

#### **III. THE KIND OF INFORMATION WE HOLD ABOUT YOU**

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- Any information you have provided to us in your curriculum vitae and/or covering letter;
- Any information you have provided on our crew application form, including but not limited to your name, rank, nationality, date of birth, address, telephone number, personal email address, passport details and education;
- Your right to work, visa status and employment status;
- Your professional qualifications, including your seaman's book number, seaman's place and date of issue and seaman's date of expiry and sailing records;
- Any information you provide to us during an interview; and
- Any other information about yourself that you disclose to us.

#### **IV. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect your personal data when you submit an application or CV to us by any method including by submitting a crew application form or CV to us directly at [crewing@coolcoltd.com](mailto:crewing@coolcoltd.com) or via one of our manning offices.

In considering your application we may also obtain information from third party sources, including any referees that you specify, and any publicly available sources, including verifying the authenticity and validity of certificates and endorsements through the IMO website and other websites.

We may collect your personal data from a background check provider to verify any personal data you have provided to us for example to check your identity and contact details, right to work, education and employment history. You will be notified prior to any such background check and you will be required to provide your consent to the background check provider.

#### **V. HOW WE WILL USE INFORMATION ABOUT YOU**

In order to consider a candidate for a position, CoolCo has a legitimate interest in using the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for a position;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes;
- Comply with legal or regulatory requirements;
- Conduct background checks;
- Assess your suitability for the role; and/or
- Where necessary, verify bank account details.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

#### **VI. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

If we are considering offering you a position, we may obtain and use the following particularly sensitive personal information in the following ways:

- Health and welfare: We may require candidates to undergo health screening as part of their pre-employment checks. We may also require you to be tested for the use of drugs and other substances. We provide occupational health services and may request information about treatment or support required; and
- Biometrics: Photographs of employees are used for identification purposes to maintain security and safety whilst on board our ships, and will be required to be provided by candidates as part of the recruitment process.

## **VII. DATA SHARING**

### *a. Sharing personal data within CoolCo group companies*

We process personal data about our employees worldwide depending upon the type of position and the CoolCo subsidiary or affiliate that is recruiting. We may transfer personal data about you to subsidiaries and affiliates in connection with your application. Personal data exchanged between subsidiaries or affiliates is subject to appropriate legal and technical controls to ensure that it is processed lawfully and securely.

All entities in the CoolCo group take appropriate security measures to protect your personal information in line with our policies.

### *b. Transferring personal data to other countries*

We collect and process personal data in Norway, Malaysia, the European Union (EU) and United Kingdom (UK). When necessary, we will process your personal data worldwide. This may involve sending your personal information between different countries, including countries outside the EU.

### *c. Why might you share my personal information with third parties?*

We may share your personal information with a third-party service provider for the purpose of crew evaluation testing.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Except as indicated above, your details will be accessible only by our authorised CoolCo personnel and will not be disclosed to any third party unless your consent is obtained (as per paragraph IV). The information we hold is not traded with any external bodies or organisations and is not used for marketing purposes.

## **VIII. DATA SECURITY**

We have appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to authorised CoolCo personnel and other third parties who have a business need to receive the information. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and, in compliance with our legal obligations, will notify you and any applicable regulator of a suspected breach.

## **IX. DATA RETENTION**

### *How long will you use my information for?*

If you have sent us a speculative application, we may retain your personal data for up to twelve (12) months from receipt of such data so we can consider you for any future positions.

If your application is successful and you are employed by CoolCo, we will retain your personal data for the duration of employment. The privacy notice for CoolCo employees will be provided to you during the onboarding process.

If your application is unsuccessful, we may retain your personal data for up to six (6) months after we have communicated to you our decision about whether to appoint you to the position for administration purposes, for the prevention and detection of fraud and to investigate disputes including so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations although limited information, including your name, may remain on internal candidate lists and with third-party service providers used for the purpose of crew evaluation testing after the recruitment process is completed.

If your application is unsuccessful, we may also wish to retain your personal data should we wish to consider you for any future positions. In those circumstances, we will request your written confirmation that we can retain your personal information for a fixed period. If you do not provide your written confirmation that we can retain your personal information within the time period set out in our request, we will retain your personal data on the basis set out above.

## **X. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request rectification of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest and there is something about your situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request the deletion of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer at [dpo@coolcoltd.com](mailto:dpo@coolcoltd.com).

If you request the deletion of your personal information, we will no longer process your application and we will dispose of your personal data in accordance with paragraph IX above.

## **XI. CONTACT DETAILS**

If you have any questions about this Notice or how we handle your personal information, please contact the Data Protection Officer at [dpo@coolcoltd.com](mailto:dpo@coolcoltd.com).