

## Privacy Policy

Hobark International Ltd (“Hobark”) is committed to being open and transparent about how we manage personal data, and to protecting and respecting the privacy of our Employees, Candidates, Clients /Customers, and Suppliers.

This Hobark policy outlines how we collect personal information and how we use, maintain, store and disclose the personal information we hold and reflects our commitment to you.

We may review and update this policy from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Please regularly check our privacy policy so that you are aware of these updates and changes.

If you do not agree with this privacy policy and to our processing of your data in the manner outlined in the Policy, **please do not submit any personal data to us.**

### About us

Hobark International (UK) Ltd provides Recruitment and Consultant Management Service, and is registered (RR: Z3259474) as a data controller in the United Kingdom for the purposes of the Data Protection Act 1998. We will ensure that the data you supply to us is processed fairly and lawfully, and with skill and care and used only for the purposes set out in this policy.

Any questions regarding this policy and our privacy practices should be sent by email to [hcms@hobarkintl.com](mailto:hcms@hobarkintl.com) or by writing to Hobark International (UK) Ltd, *28 Bruton Street, Mayfair, London W1J 6QW, United Kingdom*. Alternatively, you can telephone *0203 813 4484*.

If however, you are not satisfied with the way we have treated your personal data, you may complain to the local supervisory authority: The Information Commissioner's Office. You can contact them in the following ways: By Phone: *0303 123 1113*; Email: [casework@ico.org.uk](mailto:casework@ico.org.uk); Post: *Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF*

### Types of Information we collect from you

For our *Candidates*, in order to provide the best possible employment opportunities, we may collect data about you, both personal information and also sensitive personal information where appropriate and in accordance with local laws and requirements.

- Personal information includes - Name; Age/date of birth; Sex/gender; Photograph; Marital status; Contact details; Education details; Employment history; 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 (where we need to carry out financial background checks); Social security number (or equivalent in your country) and any other tax-related information; Details about your current remuneration, pensions and benefits arrangements; Information on your interests and needs regarding future employment; Extra information that you choose to tell us; Extra information that your Referees chooses 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 LinkedIn, Rigzone, and other job sites; and other information obtained or received by us in connection with your possible and actual work placements.
- Sensitive information is a special category of personal information or opinion about you, including Membership of a professional or Trade Association or Membership of a Trade Union; Criminal Record (if this is required for a role you are interested in applying for); Physical or Mental Health, including Disability-related information, Racial or Ethnic Origin, Political Opinions, Membership of a Political Association, Religious Beliefs or Affiliations, Philosophical Beliefs, Sexual Preferences or Practices. In most cases, sensitive information can only be disclosed with your consent.

For *Clients*, we generally only need limited data: Contact details or the details of individuals at your organisation (such as their Names, Telephone Numbers and Email Addresses) to enable us to provide you (i) Recruitment Solutions; (ii) Consultant Management Services; (iii) Training; (iv) Integrated Oilfield Project Management Services and; (v) Bring to your notice matters which are likely to be relevant and useful to you.

For *Suppliers*, we will collect your Contact details or details of relevant individuals at your organisation (such as their Names, Telephone Numbers and Email Addresses) so we can communicate with you. We'll also collect bank details, so that we can pay for the services you provide (if it is part of the contractual agreement between us) We may also hold extra information that someone in your organisation has chosen to tell us.

For *referees and emergency contacts*, to ask for a reference in support of a candidate's employment opportunity, we'll obviously need the referee's contact details (such as Name, Email address and Telephone Number). We'll also need these details if our Candidate or a member of our Staff has put you down as their Emergency Contact so that we can contact you in the event of an accident or an emergency.

## How we collect information from you

In the case of *Candidates*, we may collect personal or sensitive information Directly from You or from third Parties when:

- You complete one of our application forms or provide any other information in connection with your application
- You leave a hard copy CV at a Hobark recruitment event, job fair or office
- You email your CV to Hobark recruiters or being qualified by them
- You apply for job through Hobark website
- We search for potential Candidate from third party sources, such as LinkedIn, Rigzone, other job sites
- You are referred to us through another manpower services company, who may share personal information about you with us.
- We receive any reference, where referees may disclose personal information about you
- We receive results of inquiries that we might make of your former employers, work colleagues, professional associations or registration body
- Clients share personal information about you with us
- We receive the results of any competency or medical test or any background check, including credit and criminal record checks
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you were involved
- We receive any information about a workplace accident in which you are involved
- We receive any complaint or other information from or about you in the workplace
- You provide us with any additional information about you

For *Clients*, we may collect personal data directly from you or from third party sources when:

- You contact us proactively, usually by phone or email; and/or
- We contact you, either by phone or email, or through our recruiters' business development activities more generally.
- We receive third party market research and by analysing online and offline media
- We receive delegate lists at relevant events
- Our Candidates provide us with your details to act as a referee for them

For *Suppliers*, we may collect personal data directly from you or from third party sources when:

- We contact you, either by phone or email; and/or
- You contact us proactively, usually by phone or email
- We receive delegate lists at relevant events

For others 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 where a Candidate gives them to us in order for you to serve as a Referee.

### How we use your Personal Data

For *Candidates*, the main reasons for using your personal details is either to help you find employment and/or manage you as a consultant. So, we generally use Candidate data for Recruitment and Consultant Management Activities. The various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements is listed below (though not exhaustive).

- Collecting your data from you and other sources, such as LinkedIn, Rigzone, etc;
- 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 against vacancies 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 Hobark and third parties in relation to your recruitment;
- Facilitating our payroll and invoicing processes;
- Carrying out customer satisfaction surveys to improve our customer service;
- Answer your questions and enquiries
- Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- 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, or to ask for your help with connecting other Candidates with jobs
- Enabling us to develop and market other products and services;
- Marketing our full range of Manpower services to you;
- Displaying promotional excerpts from your details on Hobark's website(s) as a success story (only where we have obtained your express consent to do so); and
- Helping us to establish, exercise or defend legal claims;

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests as a data controller. From time to time we may seek your consent to process, use or disclose your information for any other purpose not listed above.

For *Clients*, we use your information to provide you suitable candidate to man your operations, as well as manage consultants deployed to your sites. To facilitate these, we use your data in the various ways listed below:

- Maintaining our business relationship;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;
- Keeping records of your instructions, our conversations and meetings, so that we can provide requested services to you;
- Undertaking customer satisfaction surveys; and
- Processing your data for the purpose of targeting appropriate marketing campaigns.
- Helping us to establish, exercise or defend legal claims.

For *Supplier*, we use your information to request for support and services. To facilitate these, we may use your data in the following ways:

- Maintaining our contractual arrangements and business relationship;
- Storing (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- Obtaining support and services from you, or offering you same;
- Complying with certain legal obligations;
- Helping us to establish, exercise or defend legal claims.

For others, such as *referees and emergency contacts*, we will only use the information that our Candidate or Staff gives us about you for the following purposes:

- If you are put down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or
- If you were put down as a referee, we will contact you in order to take up a reference.
- We may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Candidates

### Who we share your personal data with

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of individuals or organisations:

- Any of our Hobark group companies, whose locations can be found at [www.hobarkintl.com](http://www.hobarkintl.com);
- Potential employers and third-party partners to increase your chances of finding employment;
- 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)
- 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 and in accordance with local laws;
- We may transfer your information to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of Hobark provided that the third party agrees to adhere to the terms of this Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the laws on data protection.

### Safeguard of your personal data

Whether you interact with us personally, by phone, mail, over the internet or other electronic medium, safeguarding the privacy of your information is important to us, so we take reasonable technical and organisational measures to protect the personal information we hold from misuse, interference and loss, unauthorised access, modification or disclosure. These include measures to deal with any suspected data breach.

We hold personal information in a combination of secure computer storage facilities (servers) and paper-based files and other records. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

If you suspect any misuse or loss of or unauthorised access to your personal information, please let us know immediately, by contacting the Privacy Officer – details at end of document.

### Duration we keep your personal data

In general, we will delete your personal data from our systems if we have not had any "meaningful contact" with you for three years (or for such longer period as is necessary to comply with our statutory and contractual obligations and in accordance with our legitimate interests). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

We will use reasonable endeavours to ensure that your Personal Data is maintained and up to date. However, you are under a duty to inform us of any and all changes to your Personal Data to ensure that it is up to date and we will update or delete your Personal Data accordingly.

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services.

### Various Rights you retain in respect of your Data you have given us

These are described in detail below, and 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 be Informed:** You have a right to know how we use your personal data, and that we are compliant with the requirement for accountability and transparency. It is within your rights to be informed via privacy notices which are concise, transparent, intelligible and easily accessible, free of charge, that are written in clear and plain language, particularly if aimed at children.

**Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, to verify the lawfulness of our processing activities, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:

- we may ask you to verify your identity, or ask for more information about your request; and
- we may charge your request if it is manifestly unfounded or excessive
- where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

**Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. This will be done without delay, and no later than one month. 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.

**Right to restrict processing:** You have the right to request that we restrict, block or otherwise suppress 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; (i) you consent; or (ii) 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;
- where you object to our processing of your personal data for our legitimate interests.
- where our processing of your data is unlawful; and
- where we have no further need to process your personal data,

We will, however, retain enough data to ensure the right to restriction is respected in the future.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests, or for performance of a public interest task to do so, and you do not agree, you have the right to object. You also have the right to object to direct

marketing, including profiling and processing of your data for scientific and historical research and statistics. 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.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities, you may withdraw this 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.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this, provided there is no undue burden and it does not compromise the privacy of other individuals – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format. This will be done timely and for free.

This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

**Right to erasure or to be forgotten:** In certain situations (for example, where we have processed your data unlawfully – in a manner which does not comply with GDPR; the data is no longer necessary for the purpose it was collected; you have withdrawn your consent to us processing your data; etc), you have the right to request us to "erase" your personal data when there is no compelling reason for its continued processing. 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 (for example, to comply with legal obligations; to exercise or defend a legal claim).

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to Delete the relevant data. Any third parties who process or use that data must also comply with the request.

**Rights in relation to automated decision making and profiling:** You retain right to object to automated processing, have the rationale explained to you, and request human intervention

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found above – under "[About Us](#)".

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data. If you would like to exercise any of the rights listed above, please contact us.

## How we transfer your data internationally

To provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred between Hobark Group companies, Clients and Third parties located outside of the European Economic Area. Accordingly, your personal information may be sent to or be capable of being accessed from outside the European Economic Area. These countries may not have similar data protection laws to the UK and EU. By submitting your personal data, you're agreeing to this transfer, storing or processing.

If we transfer your information outside of the EU in this way, we want to make sure that your data are stored and transferred in a way which is secure, ensuring that your privacy rights continue to be protected as outlined in this Policy. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or

- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client or Candidate of ours); or
- where you have consented to the data transfer.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services. Details of the Hobark group company offices which can access your details can be obtained from [www.hobarkintl.com](http://www.hobarkintl.com).

## Our Legal bases for processing your data - LEGITIMATE INTERESTS

Article 6(1)(f) of the GDPR is the one that is relevant here – it says 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."

We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis.

### CANDIDATE DATA:

- We think it's reasonable to expect that if you are looking for 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 database of vacancies. Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given us or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. 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 jobs you deserve.
- We want to provide you with tailored job recommendations and job descriptions to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.
- We have to make sure our business runs smoothly, so that we can carry on providing services to [Candidates](#) like you. 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, which it is a legitimate interest of ours to insist on meeting! 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.

### CLIENT DATA:

- 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. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

### SUPPLIER DATA:

- 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.

### OTHERS DATA:

- If you have been put down 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 for our legitimate interests as an organisation offering recruitment services and employing people ourselves.

- 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. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

## Consent

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the [GDPR](#) states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information – through a Privacy Notice;
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check or a privacy notice for you to read and sign, so that this requirement is met in a clear and unambiguous fashion.
- We will keep records of the consents that you have given in this way.

In some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

As stated earlier, you have the right to withdraw your consent to these activities. You can do so at any time.

## Establishing, Exercising or Defending Legal Claims

- Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".
- This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

## Our Website and Links to other Websites

- Our website may contain links to other websites run by other organisations. Please note that clicking on links and banner advertisements and RSS feeds may result in your transfer to another website, where data privacy practices may be different to this privacy policy.
- It is your responsibility to check other website privacy policies to ensure that you are happy for your personal information to be used in accordance with those third parties' privacy policies. We accept no responsibility for and have no control over third party websites, links, adverts or RSS feeds or information that is submitted or collected by third parties.



## Change to our Privacy Policy

Any changes to this Privacy Policy will be posted on Hobark website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner. Continued use of the website or our services after such changes will constitute your acceptance of such changes.

This Policy was last updated in March 2018.

### Contact: (Privacy Officer)

Dr Emmanuel Okoroafor  
Hobark International (UK) Ltd  
28 Bruton Street, Mayfair  
London W1J 6QW,  
United Kingdom  
Email:  
[hcms@hobarkintl.com](mailto:hcms@hobarkintl.com)  
Tel: 0203 813 4484

### Contact: (Data Protection Officer)

Princewill Godwin  
Hobark International Limited  
Plot 46 Ordinance Road  
Off Trans Amadi Industrial Layout  
Port Harcourt  
Rivers State  
Email: [admin@hobarkintl.com](mailto:admin@hobarkintl.com)  
Tel: +1 832 886 0074 Ext 122