Privacy Policy

INPO/WANO AC Privacy Notice

This document is to be used where the Institute of Nuclear Power Operations or the World Association of Nuclear Operators, Atlanta Centre (hereinafter referred to as INPO) processes personal data relating its own and its Members employees, workers, contractors, board members and other third parties that interact with INPO.

INPO is committed to protecting the privacy and security of your personal information. This Notice is intended to provide you (the Data Subject) with information on how your personal data will be collected and processed by INPO.

If you have any questions regarding this Privacy Notice please contact <u>CESHelp@inpo.org</u>, by phone at (770)644-8000, or by mail at

Director, Information Technology 700 Galleria Parkway, SE Suite 100 Atlanta, GA 30339

How is your personal data collected?

We will collect your personal data though your interactions with our organization, either directly from you or from what you provide when you visit our websites. We may also collect additional information from third parties, including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of your activities undertaken on behalf of INPO.

How will we use you personal data

Your personal data will be processed for purposes relating to your interactions with INPO at INPO, at one of the WANO Regional Centres, or at an INPO/WANO Member Organizations ('Purpose for collecting personal data').

The types of information we hold about you

Personal data

Where appropriate for purpose defined above, we will collect and process your: name, gender, date of birth, home address, telephone/facsimile number of home and affiliated entities, emergency contact, e-mail address, work history, resume, photo ID (passport, driver's license, resident card, etc.), bank account, job title, employer name, place of current assignment (if actual employer is different from where you have been assigned), birth place, country/area, country of citizenship, size of clothing and shoes, dietary restrictions, CCTV footage and information obtained through electronic means (such as swipe cards records). We will also

collect your user name and password when you log into the organization's access-controlled websites; and you may voluntarily submit information in response to various forms and surveys conducted on those websites.

Sensitive data

If and when you enter a radiation control area, we may also collect and process information relating to your individual exposure dose. We may also collect any sickness information provided by you during the course of your engagement on behalf of INPO or WANO.

Personal Data relating to Children

Where your children will be travelling or re-locating with you for the purposes of your engagement by INPO or WANO, we will also require personal data relating to your children. This may include their name, gender, date of birth, home address, emergency contact information, photo ID, place of birth and country of citizenship.

Automatic Data Collection Technologies

As you navigate through and interact with our Websites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. Learn more about automatic data collection by reading our Cookie Policy.

Our lawful basis for using your information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation (such as complying with our obligations under employment law and health and safety regulations).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. These legitimate interests will be to enable INPO or WANO and/or its Member Organizations to fulfil its obligations to each other with regard to carrying out:
 - o Plant Evaluations, Corporate Evaluations, Review Visits
 - o Training seminars or Conferences
 - o Peer Reviews, Member Support Missions, Training and Development, Working Groups or any other WANO activities that supports safe operation of our Member plants.
 - Secondee and permanent placements;

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests), such as in amedical emergency.
- Where it is needed in the public interest or for official purposes.

• Where you have given your consent to use your data for a specified purpose. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data.

How we will use your data

The situations in which we will process your personal data are set out in the table below. We have indicated the basis for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

Purpose	Category of Data	Lawful Basis	Duration
To verify your identity	Personal data	Our legitimate interests in verifying who you are prior to your engagement with INPO or WANO & when a contractual necessity	 For the life of the secondment, employment or contractual agreement. The duration of a mission. Any additional period necessary in accordance with record retention obligations under applicable laws.
To assess your eligibility for each engagement	Personal data	Our legitimate interests in ensuring that you are suitable for the engagement & contractual necessity	 For the life of the secondment, employment or contractual agreement. The duration of a mission. Any additional period necessary in accordance with record retention obligations under applicable laws.
For arrangement of travel	Personal data	Contractual necessity	The length of the trip.
To support your visa application	Personal data	Contractual necessity	 The length of the trip. Any additional period necessary in accordance with record retention obligations under applicable laws.
For payment of salaries, expense adjustments and daily allowances	Personal data	Contractual necessity	 For the life of the secondment, employment, or contractual agreement. Any additional period necessary in accordance with record retention obligations under applicable laws.
To manage the entry and exit of INPO or WANO Members' nuclear power station(s) or corporate office	Personal and sensitive data	Contractual necessity	 The duration of the mission. Any additional period necessary in accordance with record retention obligations under applicable laws.

To meet our health and safety obligations, including radiation exposure restrictions	Personal and sensitive data	Complying with a legal obligation	 For the life of the secondment, employment, or contractual agreement. Any additional period necessary in accordance with record retention obligations under applicable laws.
To record activities implemented by INPO or WANO	Personal data	Our legitimate interests in monitoring and analysing INPO and WANO activities	Permanent historical record.
To request participation in future INPO or WANO activities, missions, or meetings	Personal data	Our legitimate interests of engaging experienced personnel for other INPO and WANO engagements & contractual needs	• Four years.
To comply with Company policies	Personal data	To comply with a legal obligation.	Seven years
To include you in company benefit plans	Personal data	Contractual necessity	 For the life of the secondment, employment, or contractual agreement. Any additional period necessary in accordance with record retention obligations under applicable laws.
Any other activities necessary to fulfil your secondment, employment or contractual agreement with WANO	Personal data	Contractual necessity	 For the life of the secondment, employment, or contractual agreement. Any additional period necessary in accordance with record retention obligations under applicable laws.

Duration of Processing

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are set out in the table above, and are available in our Data Storage, Usage and Retention schedule which is available from the Data Protection Officer (DPO).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with (our data retention policy and applicable laws and regulations).

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our IT environment, you are responsible for keeping this password confidential. We ask you not to share your password with anyone or allow anyone other than you to access the INPO IT environment with your password. We additionally urge you to be careful about giving out information in areas of the IT environment like message boards. The information you share in such areas may be viewed by any user of the IT environment.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our IT environments. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the INPO IT environments.

Recipients of the personal data and International Transfers

Where necessary for the purposes set out in this notice, your data may be shared with WANO's Regional Centres (WANO London and Hong Kong offices, WANO Atlanta Centre, WANO Paris Centre, WANO Tokyo Centre and WANO Moscow Centre) and relevant WANO Member Organisations (including your employer).

For European Union citizens, to the extent that the WANO Regional Centre(s) or WANO Member Organisation(s) are not located within the EEA, and to the extent your personal data is subject to the terms of the General Data Protection Regulations, the processing of your personal data will be subject to Standard Model Clauses as agreed between the WANO Regional Centres and WANO Members. You may obtain a copy of the applicable clauses by contacting the WANO DPO.

We will also share your personal data with third party suppliers as necessary to support the activities set out in 'How we use your personal data' section above. Information on these third parties shall be made available on request from the DPO.

Mobile Information

"No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties

Your rights

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

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 correction 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 (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 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 erasure 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 DPO in writing.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations necessary to participate in INPO or WANO activities.

Right to lodge a complaint

You have the right to complain about the processing of your personal data to a Supervisory Authority.

Changes to this Notice

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Contact Information

If you have any questions regarding this notice, or if you wish to exercise any of your rights regarding the processing of your personal data, please contact us by email at CESHelp@inpo.org, by phone at (770)644-8000, or by mail at

Director, Information Technology 700 Galleria Parkway, SE Suite 100 Atlanta, GA 30339