

Privacy Policy

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1. Introduction

This Privacy Policy ensures that all SBM Offshore entities and its associated workforce, including employees (whether fixed term or permanent), contractors, interns, and seconded staff, comply with applicable laws regarding personal data protection.

SBM Offshore is subject to regulatory requirements for personal data protection set out in the EU legislation under the General Data Protection Regulation 2016/679 EC (GDPR) and all other non-EU applicable legislation.

2. Key Principles of Privacy and Data Protection

- a) **Lawfulness, fairness and transparency:** Personal Data is processed in a lawful, fair and transparent manner in relation to the Data Subjects;
- b) **Limited purpose:** Personal Data is collected only for specified, explicit and legitimate purposes and processed only to the extent necessary for these purposes;
- c) **Limited scope:** Personal Data processed is adequate, relevant and limited in scope to what is necessary to achieve the purposes for which Personal Data is processed;
- d) **Accuracy:** Personal Data is accurate and, where necessary, kept up to date, only for the purposes for which it is processed;
- e) **Limited retention time:** Personal Data is processed in a format that permits identification of the Data Subjects, for no longer than necessary for the purposes for which it is collected;
- f) **Integrity and confidentiality:** Personal data is processed securely, ensuring protection against unauthorized or unlawful processing, as well as accidental loss, destruction, or damage. This is achieved through the implementation of appropriate technical and organizational measures.

3. Our Position

Protection of Personal Data is highly valued in SBM Offshore, ensuring safe processing by implementing all appropriate technical and organizational measures.

Personal Data in SBM Offshore is never considered as a subject of sale, lease, public posting or disclosure to other companies, organizations or websites.

Personal Data is never collected, stored or in other ways processed by SBM Offshore, if such processing is not specifically allowed by the law and our Privacy Policy.

All data subject's rights are respected and protected in SBM Offshore under standard policies and procedures to ensure compliance with the legal requirements in all operational jurisdictions.

4. Personal Data and Data Subjects

Personal Data is any information regarding a Data Subject that leads to identification, including name, surname, date of birth, location, IP address and job description.

Data Subject is an identified or identifiable natural person from whom, or about whom, information is collected (e.g. SBM Offshore employees, employment candidates, employees of third parties, etc.).

A company or an organization cannot be a Data Subject.

5. Processing of Personal Data

5.1 What Personal Data is Collected

a) Simple Data

- Identification data (e.g. full name, date of birth, social security information), copy of identity documents, driver's license and residence/work permit;
- Contact details including residential address, phone number, e-mail address or any data collected during the recruitment process (e.g. CV, cover letter, copies of qualification certificates, references);
- Family status information;
- Financial and bank account data, payroll statements, salary, annual leave, overtime, pension and benefits;
- Geographic location data;
- CCTV footage and other electronically obtained information;
- Information about the use of our IT and communications systems (e.g. log files, data traffic);
- Photographs in passport, IDs and company activities in internal SharePoint.

b) Special Categories Data

- Health data (e.g. medical records, medical history, health and health treatment status);
- Ethnicity, origin, religion, participation in a trade union;
- Criminal convictions and offences, only when required by legislation and absolutely necessary.

5.2 How Personal Data Is Collected

- Directly from the Data Subjects;
- By workplace activities to the extent this is necessary for participation in them;
- From recruiting agencies with which SBM Offshore collaborates in specific cases;
- From the third parties within the scope of a contract;

5.3 Why We Collect Personal Data

Personal Data is collected and processed for purposes directly related to the employment relationship and SBM Offshore's relationships with third parties.

Personal Data may also be processed for financial audits, performance assessment, evidence of possible complaints or reports or investigations, legal disputes, network security and confidentiality, prevention from unauthorized access to electronic devices, and communications systems, as well as prevention of malware distribution.

5.4 Legal Basis for Processing Simple Data

Personal Data is collected, stored or transferred under the following legal basis:

- **Consent:** The Data Subject has given consent to the processing of his or her Personal Data for specific purposes;
- **Performance of a Contract:** Processing is necessary for the performance of contract to which the Data Subject is one of the parties or for any request of the Data Subject prior to entering into a contract;
- **Compliance with a Legal Obligation:** Processing is necessary for SBM Offshore to comply with a legal obligation;
- **Protection of the Vital Interests:** Processing is necessary to protect the vital interests of the Data Subject or of another natural person;
- **Public Interest:** Processing is necessary for the performance of a task carried out for the public interest or in the exercise of official authority vested in SBM Offshore or a third party).;
- **Legitimate Interest:** Processing is necessary for the purposes of the legitimate interests pursued by SBM Offshore or by a third party, except where such interests are overridden by protected fundamental rights and freedoms of the Data Subject.

5.5 Legal Basis for Processing Special Categories of Data

Personal Data of Special Categories is processed only when it is enforced by law, with the explicit consent of the Data Subject, or for fulfilling a legal obligation of SBM Offshore. This includes exercising specific rights under employment and labor law, social security, and social protection in accordance with applicable local law, particularly relating to workplace health and safety, including:

- **Health Data** is processed directly and exclusively by Data Subjects with their explicit consent or in the case of being absolutely necessary:
 - to fulfil SBM Offshore's obligations to ensure workplace health and safety; or
 - for the establishment of SBM Offshore employees' rights and for the proper allocation and distribution of social security law benefits.
- **Ethnicity Origin Data** is collected for the establishment of employment relationship regarding social security and labor law rights;
- **Biometric Data** is collected as a result of specific technical processing relating to the physical unique characteristics of a Data Subject to identify and authorize him or her, when accessing a physical or electronic sector, such as facial images, face recognition or fingerprints;
- **Trade Union Data** is processed only under the explicit consent of the Data Subject and if it is absolutely necessary for social security and labor law matters of the Data Subject;
- **Children Data** is processed only for the implementation of social security and labor law requirements of SBM Offshore employees.

6. Retention of Personal Data

6.1 Data Retention

Personal Data is retained by SBM Offshore only for the duration of the relationship with Data Subjects, according to specific retention periods as below. Upon expiry of each of the relevant retention periods, all Personal Data is erased or anonymized.

6.2 Specific Data Retention Periods

- **Employees Data:** For the duration of the employment agreement and for an additional period of 2 years after termination of the employment relationship;
- **Social Security and Tax Information:** For a minimum of 10 years after the expiry of the employment agreement pursuant to SBM Offshore's legal obligations;

- **Special Category Data:** For no longer than necessary to fulfill the purpose for which it has been processed.

7. Data Subjects Rights

7.1 Right of Access

Is the right to obtain information about the Personal Data collected and stored, free of charge.

7.2 Right of Rectification

Is the right to request rectification and update of the data and completed, in case of a mistake or incompleteness.

7.3 Right of Erasure

Is the right to request deletion of the Personal Data when:

- Personal Data is no longer necessary for processing purposes; or
- The Data Subject has withdrawn their consent; or
- The Data Subject objects to the processing; or
- Personal Data has been unlawfully processed; or
- The Personal Data must be erased in compliance with a legal obligation which SBM Offshore is subjected to.

7.4 Right of Restriction of Processing

Is the right to restrict the processing of Personal Data, when erasure is impossible due to limitations of law.

7.5 Right of Objection

Is the right to object if processing has been made without lawful purpose or means and has effects and impact on Data Subject.

7.6 Right of Data Portability

Is the right to request Personal Data to be transferred to another database, if the Personal Data is provided by the Data Subject and is carried out by automated means.

8. Technical and Organizational Measures

8.1 What is a “Data Breach”

Data Breach is a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

8.2 What are “Technical and Organizational Measures”

All appropriate Data Protection technical and organizational measures are implemented by SBM Offshore to ensure the highest and most appropriate protection of Personal Data against a Data Breach. Personal Data is secured, and Data Subjects Rights are protected with the implementation of technical and organizational measures.

Such measures include:

- Adoption of internal data protection policies and procedures;
- Monitoring compliance with software and hardware equipment;
- Using data loss prevention systems (Encryption, Antivirus technology, Anonymization, Pseudonymization);
- Adoption of latest and updated Cyber Security technology;
- Vigilance against internet threats, like phishing e-mails, by protecting our passwords and safeguarding SBM Offshore’s assets in our care.

9. Contact Details

SBM Offshore Group Compliance Department

SBM Offshore N.V.

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