

PRIVACY NOTICE FOR THIRD PARTIES

PLEASE READ THIS NOTICE CAREFULLY. IT CONTAINS IMPORTANT INFORMATION ABOUT HOW WE PROCESS YOUR PERSONAL INFORMATION.

Who we are and how we approach data privacy

We are Crondall Energy comprising of:

1. Crondall Energy Ltd ("CEL") (Company Registration No. 11678365);
2. Crondall Energy Consultants Ltd ("CEC") (Company Registration No. 04086014);
3. Crondall Energy Subsea Ltd ("CES") (Company Registration No. 07747043);
4. Crondall Training Ltd ("CTL") (Company Registration No. 10803055); and
5. Buoyant Production Technologies Limited ("BPTL") (Company Registration No. 11412897).

The registered office of each of the above companies is: Wey Court West, Union Road, Farnham, Surrey, GU9 7PT.

We are a leading independent oil and gas consultancy providing strategic, commercial and technical services for offshore oil and gas projects that use floating production and subsea technologies.

This notice explains how we, and carefully selected third parties we work with, will collect and use the personal information of:

1. our business contacts (clients and suppliers) and prospects;
2. individuals who use our website for general interest;
3. individuals applying for a role with us; and
4. ex-employees.

If this describes you, please read this notice carefully and make sure you are comfortable with the content.

As a company we are committed to protecting and respecting the privacy of the personal information we hold. We want you to be confident that your information will be properly protected whilst in our possession.

Our data protection compliance team can be contacted at: compliance@crondall-energy.com.

If you have any questions about our use of your personal information, or you wish to exercise one of your rights under data protection legislation, please contact us. A summary of your rights is detailed at the end of this notice.

Our website

This notice details how we use information you provide to us about you through our website (<https://www.crondall-energy.com/>).

Any other external websites that may be linked to our website will be subject to their own data protection statements/privacy policies which may be different to this notice. You should check carefully the content of those third party notices before you submit any personal information to them.

Unfortunately, the transmission of information through the internet is never completely secure. Although we do our best to protect your personal data at all times, we cannot guarantee the security of the data you send to us through our website. Any transmission made is therefore at your own risk. We have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Once we have received your information, we use strict procedures and state of the art security features to protect against unauthorised access.

Information we collect from you and how we use it

We hope the following table helps you to understand what information we may collect, in what circumstances and how we use that information (including how long we retain it for).

Category of information	Where it comes from	What is collected and how we use that information	How long we will keep it for
Information you give to us (Voluntary Information)	This is information you give to us about you:		
	<ul style="list-style-type: none"> by contacting us with an enquiry or to report a problem with our website – (including through our “Contact Us” function); 	<p>In order to process your enquiry and/or investigate a problem we may ask you to provide basic contact information (name, address, telephone number and email address) so we can verify your identity and deal with your enquiry/resolve the problem.</p> <p>We may make up an electronic file of the enquiry/problem which will contain any personal information you have given us.</p> <p>We will only use your personal information here to investigate and respond to you with the outcome of your enquiry/our investigation.</p> <p>You do not have to provide this information to us, it is entirely voluntary. However, we may be limited in our ability to deal with your enquiry and respond to you if contact information is not provided. We will only correspond with you in the way you have asked us to.</p> <p>It is in our legitimate business interests to process this information in order to deal</p>	6 months

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		with your enquiry/investigate the problem you've raised. We'll ensure your rights are protected.	
	<ul style="list-style-type: none"> by corresponding with us (for example by email, phone or letter); 	<p>When you contact us, any personal information you provide will be protected in the same way as we treat our commercial information.</p> <p>We will monitor any emails we receive (plus attachments) for any viruses or malicious software. We will promptly delete any email which is illegal or presents harm to us.</p>	6 months
	<ul style="list-style-type: none"> by submitting a job application (and the subsequent application process); 	<p>All of the information you provide during the application process will only be used for the purpose of processing your application (prior to possibly entering into an employment contract or consultancy contract), or to fulfil legal requirements. This includes your name, address (present and historic), telephone number, email address, job history, and qualifications.</p> <p>We will not share any of this personal information for marketing purposes. The information you provide will be stored securely by us and our data processors. This captures data in both electronic and paper form.</p> <p>We will use the contact information you provide to keep you up to date on the progress of your application. We will use the other information you provide to assess your suitability for the role you have applied for.</p> <p>If we make a conditional offer of employment to you we may ask you to provide additional information so that we can carry out pre-employment checks (such as proof of ID, proof of qualifications, referees and health information).</p> <p>Information about your health is a special category of data and we will need your express consent to process it.</p>	<p>Your personal information will be held for the duration of the application process.</p> <p>If successful, your personal information will be retained and held in line with our Privacy Notice for Employees, Workers and Contractors.</p> <p>If unsuccessful and you consent to us keeping your data on file, it will be held for 6 months. If you do not consent we will delete your data within 1 week.</p>

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		<p>If you're asked to provide referee contact information please ensure you firstly have the express consent of that individual to provide his/her contact information to us.</p> <p>You may also be asked to provide evidence of your right to work in the UK/[internationally].</p> <p>If you are successful in your application, we will provide you with a further Privacy Notice for Employees, Workers and Contractors to advise how we handle the personal data of our staff. You will receive a copy of this in your induction pack.</p> <p>If you are unsuccessful, we may ask you for your consent to keep your information on file in case any other opportunities arise which we feel may be of interest.</p>	
	<ul style="list-style-type: none"> as a business contact; 	<p>We will keep:</p> <ul style="list-style-type: none"> a record of business contacts of our clients, suppliers, advisers, and agents and their contact information in order to manage our commercial relationship with that third party and perform contractual obligations (i.e. it is necessary for us to perform a contract); a record of contacts from competent authorities and regulators linked to our industry, together with their contact information, in order to comply with a legal obligation; and a record of prospective business contacts. This is in our legitimate interests (i.e. we have a justifiable reason for processing information in this way). 	7 years
	<ul style="list-style-type: none"> being a former employee or worker of Crondall Energy. 	We will retain your personal data after employment or engagement in accordance with our separate Privacy Notice for Employees, Workers and Contractors. Please contact us if you would like a copy of this notice.	As set out in our Privacy Notice for Employees, Workers and Contractors
Information we collect about you and your device	Each time you visit our website we will automatically collect the following information:	<p>Some online identifiers (such as your IP addresses) are your personal information.</p> <p>We collect Device Information so that we can ensure adequate technical support for our website and ensure it is functioning</p>	6 months

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	<ul style="list-style-type: none"> technical information, including your operating system, the browser you use, time zone setting, browser plug in types and versions, your log in information and the internet protocol address used to connect your computer to the internet (Device Information); details of your use of our website including traffic data, the resources you use, where you have clicked through to our website from that of a third party, the domain name of the connecting website, page response times, download errors, length of your visit, page interaction information and browsing behaviour (Log Information). 	<p>properly on all operating systems/browsers. We want to ensure the content of our website is being presented to you in the most appropriate way to ensure it is easy to use/navigate. We also need this information in order to allow you to participate in interactive features on the website where you choose to do so.</p> <p>We collect Log Information so that we can better understand how our website is used and improve its functionality/content. We want to provide you with a customised service.</p> <p>Your Device Information and Log Information will be combined with that of our other users and analysed or reported back to selected third parties in statistical form. It will not be possible to identify you from this aggregated information.</p> <p>These activities are in our legitimate interests (i.e. we have a justifiable reason for processing your information in this way).</p> <p>We use cookies and pixel tags on our website:</p> <ul style="list-style-type: none"> an http cookie (commonly referred to as a cookie) is a parcel of text sent back and forth between a web browser and the server it accesses. Its original purpose was to provide a state management mechanism between a web browser and a web server. Without a cookie (or similar solution), a web server cannot distinguish between different users, or determine any relationship between sequential page visits made by the same user. For this reason, cookies are used to differentiate one user from another and to pass information from page to page during a single user's website session. A web server uses cookies to collect data about a given browser, along with information requested and sent by the website visitor. Cookies 	

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		<p>themselves do not identify people, but rather they are defined themselves by a combination of a computer, a user account and a browser.</p> <ul style="list-style-type: none"> a pixel tag is an invisible tag placed on certain parts of our website. It does not leave a footprint on your computer/device. <p>Pixel tags and cookies work together to tailor our website. These are also used in our email communications to understand whether you have used our website from the email and record whether it has been read.</p> <p>You can manage this automatic collection of data by adjusting your cookie settings. More information can be found at http://www.allaboutcookies.org/</p>	
Information we receive from third parties (Third Party Information)	We work closely with third party recruitment agencies to help us select staff and contractors.	We carefully select the third parties we work with to ensure they handle your personal information in line with our standards and those required by law. They will only provide us with information candidates have authorised them to send to us and we only use that information to assess candidates. All personal data received about candidates is treated in the same manner as information sent directly to us by candidates.	6 months

Do I have to provide this information?

In most cases the personal information you provide to us in the table above is entirely voluntary. You are not under a statutory or contractual obligation to provide it to us. The only exceptions to this are:

- Where you work for a company which has a contract with Crondall Energy and you are involved in the performance of that contract/named as the relationship manager for that company. This is a **contractual** requirement. If you fail to provide your personal information your company may not be able to fulfil its contractual obligations to us;
- Where you are engaged with Crondall Energy as a third party consultant. It will be necessary for Crondall Energy to process your personal information to perform the **contract** it has in place with you. More information can be found in our Privacy Notice for Employees, Workers and Contractors; and

- Where you apply for employment or consultancy with Crondall and we have given you a conditional offer. Our offer may be conditional upon you providing evidence of your identity and/or your right to work in the UK and/or internationally. This is a **legal** requirement. If you fail to provide this personal information we may not be able to offer you a contract.

Keeping your personal information up to date

If you become aware that any information we hold about you is incorrect, incomplete or there are any changes to your personal details, please contact us. We will promptly correct any information found to be incorrect or incomplete.

Providing us with personal information of another person

If you need to provide us with personal information about another person you must obtain that individual's **express consent** to pass us their information. You should share this privacy notice with that individual as it may also apply to him/her.

Marketing

- **Marketing to companies and corporate bodies**

We will communicate information about Crondall Energy and our services to companies and corporate bodies (forming a view of what those recipients may need or want, or what may be of interest). We consider this to be in our **legitimate interests** which are balanced (not overridden) by the interests and fundamental rights of any identified individual.

For any emails we send to companies and corporate bodies, we will offer a route to unsubscribe from those communications/allow individual employees to unsubscribe. This option to unsubscribe can be exercised at any other time by contacting us at compliance@crondall-energy.com.

Where an individual unsubscribes we will still process his/her personal data to fulfil a product or service made by the company/corporate body (and we have a lawful basis for doing so).

- **Marketing to other individuals identified in this notice**

We will not use your personal information to directly market our products and services to you.

If you send personal information to us indirectly through the third parties we work with (marketing agencies, talent acquisition and recruitment agents) these third parties will be in control of your personal information. You should check their privacy notices to ensure you are comfortable with their marketing activities and the marketing you have consented to.

If you send personal information to us indirectly through the third parties we work with (namely, talent acquisition and recruitment agents) these third parties will be in control of your personal information. You should check their privacy/transparency notice(s) to ensure you are comfortable with their marketing activities and the marketing you have consented to.

Where we send your personal information

We may have to share your personal information with the parties set out below for the purposes set out in the above table:

1. our group companies for the purpose of managing business operations:
 - the Crondall Energy companies listed at the beginning of this policy may share personal information with:
 - each other;
 - Crondall Energy Consultants AS (based in Norway);
 - Crondall Energy Consultants PTE (based in Singapore); and
 - Crondall Energy Consultants Inc (based in the US – in strict accordance with the recommended security guidelines).
2. carefully selected third parties who provide a service to us to support our core operations, such as: processing our mail, issuing press communiqués to clients and the market on our behalf, providing IT systems and administrative services and the development and improvement of internal systems and processes;
3. competent authorities (statutory bodies, regulatory authorities, authorised bodies who have a role laid out by law). Sharing of personal information in this way may be necessary, for example, for us to comply with our health and safety obligations and/or environmental legislation;
4. other organisations where we are legally obligated to disclose your personal information (such as requests made in the prevention and detection of crime), where disclosure is necessary to protect the property, rights and safety of us and our staff or where disclosure is necessary in order to enforce or apply our contract with you;
5. another company, if our business (or part) is purchased/taken over to ensure our products and services to you can be continually serviced or as part of discussions leading up to a sale/takeover;
6. another company from whom we are looking to purchase assets, where the personal information is relevant to us assessing if those assets will improve our offering to customers and/or our business processes;
7. other companies where we are trialling products and services which we consider may improve our offering to customers and/or our business processes;
8. other third parties where you have given your **express consent** or where we reasonably believe a third party is acting on your behalf.

Whenever we share your personal information with third parties we will take all reasonable steps to ensure appropriate safeguards are in place to protect your personal information and your privacy rights.

Where we store your data

The data you provide to us, as set out above, may be transferred to, and stored at, a destination outside of the European Economic Area (EEA) by us and/or the carefully selected third parties we work with.

We and third parties we work with may use cloud platforms to store your personal information. A cloud is a network of remote servers hosted on the internet. We will only use state of the art cloud

platforms which give adequate guarantees that your personal data is secure. We will treat the storage of your personal information to the same level of protection as we treat our commercial information.

Where your data is held outside of the EEA, on a cloud or otherwise transferred, we will ensure this is only to a country which has been deemed adequate by a competent data protection regulator or where adequate protections have been put in place to safeguard the data (to the standards prescribed by law). This includes contractual protections.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this notice.

All information you provide to us is also stored on our secure servers.

To find out more about storage of your data, and the safeguards that are in place to protect your data outside of the EEA, contact us at compliance@crondall-energy.com.

Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Your rights

We recognise that the personal information we hold about you belongs to you and it is right that you have control over that personal information. We have detailed below a summary of your legal rights.

You can:

- ask us to have access to, and for a copy of, the personal information we hold about you;
- request that we amend or delete your personal information;
- ask us to stop processing your personal data altogether or in a certain way;
- change your mind about how you have agreed we can use your personal information. If you have given us **consent** to use your personal information in a specific way you can withdraw it. This means that we will stop processing your personal data in the way you have objected to from the date that your permission is withdrawn;
- issue a complaint to the appropriate authority – see www.ico.org.uk for more information; and/or
- request that we transfer your personal information to another provider (this is known as data portability).

If you would like to exercise any of these rights, or discuss them in more detail, please contact us using the email address below.

We need to make you aware that even where you exercise a right detailed above, we may not be able to comply with that request if an exception in law applies. Where this is the case, we will notify you and explain why we're unable to meet your request.

Changes to this notice

We keep this notice under regular review. This notice was last updated on 29 March 2019.

Any changes we make to this notice will be posted on our website with a prominent notice and, where appropriate, we will notify you by email.

If, in the future, we wish to use your personal information in a way not set out in this notice we will notify you and seek your permission to do so.

Contact us

If you would like to request further information about this notice or the way in which we handle your personal information, please contact us at compliance@crondall-energy.com.