

# Personal Data Protection Policy

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**Seascale Energy**



## PERSONAL DATA PROTECTION POLICY

### PURPOSE

The purpose of this Policy is to describe how Seascale Energy processes your personal data and the rights you have in relation to your personal data.

### RESPONSIBILITIES

**Process and Document Owner:**  
Head of Strategy

## 1. INTRODUCTION

Seascale Energy recognises the importance of data protection and is committed to protecting your privacy.

The purpose of this Policy is to describe the type of personal data that Seascale Energy may collect about and/or receive from you, how it will be processed and the rights you have and control you can exercise in relation to such information.

## 2. WHAT IS PERSONAL DATA?

Personal data is any information relating to a natural person who can be identified by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. For example, personal data includes but is not limited to your contact information.

## 3. WHOSE PERSONAL DATA DO WE COLLECT?

In general, the types of personal data that Seascale Energy collects from you will depend on the nature of your relationship with Seascale Energy. Seascale Energy collects personal data from a range of persons in the context of its business activities, including but not limited to the following:

- suppliers, customers and other business contacts;
- representatives of suppliers, customers and other business contacts;
- employees and job applicants;
- contractors, consultants and advisors;
- users of our websites; and
- individuals who contact us by any means.

## 4. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect personal data from you through the following means:

- when you visit our websites and/or complete one of our web forms, including through the use of cookies;
- when you visit our premises;
- when you communicate with us via any means, including but not limited to telephone, video conferencing, email and through the use of social networking websites, third party apps or similar technologies; and
- when others communicate with us about you, including but not limited to affiliate companies, business partners or other third parties (such as authorities, insurance companies and public databases).

Other types of information may be collected automatically from your device as you interact with our websites. We collect this personal data by using cookies and other similar technologies.

We may also collect information from third party sources – for example, relating to your use of other websites which we operate and from related third parties, e.g. sub-contractors.

## 5. WHAT PERSONAL DATA DO WE COLLECT?

Through our websites, online systems and business interactions, we may collect the following personal data from you:

- (a) **Contact information:** your name, position, role, company or organisation, telephone number, mobile number, email address, postal address and other personal and business contact information;
- (b) **Employment information:** data identifying you in connection with matters related to your employment and/or potential employment with or engagement by Seascale Energy, including education and qualifications, employment history, external organisation appointments, emergency and next-of-kin contact information and family and beneficiary insurance planning information;
- (c) **Business information:** data identifying you in relation to business matters in which you and/or your company or organisation are involved in with Seascale Energy;
- (d) **Your logon ID and password:** for access to Seascale Energy intranets and other services or platforms;
- (e) **Information from public sources:** for example, LinkedIn and similar professional networks, directories or internet publications;

- (f) **Social media:** any posts and/or other interactions with our social media presence, including on LinkedIn and Workplace;
- (g) **Attendance records:** to record your attendance at our offices, on board any vessels and/or on visits with any existing or potential business partners for security and business-related purposes;
- (h) **Subscriptions/preferences:** when you subscribe to receive briefings, updates, corporate publications or newsletters as well as consent preferences to help us identify which materials you are interested in receiving;
- (i) **Events data:** attendance at and provision of feedback forms in relation to any events run by us or which we attend;
- (j) **Supplier data:** contact details and other information about you and/or your company or organisation where you provide products and/or services to Seascale Energy;
- (k) **Technical information:** information obtained when you access our website and technology services, being IP address, information about your browser and operating system and movements, time zone setting, device type, hardware model, MAC address, unique identifiers and mobile network information;
- (l) **Online data:** information obtained when you access our website and technology services, information about your visit including URL clickstream to, through and from our website (including date and time), information about your network such as information about devices, nodes, configurations, connection speeds and network application performance; pages viewed or searched for, page response times, download errors, length of visits and interaction information (such as scrolling, clicks, mouse-overs) and whether you click on particular links or open our emails; and
- (m) **Other information:** any other information that you choose to provide in communications with us in connection with or related to our business interactions.

The above data will be provided to us by you, your employer, the company or organisation who is our client, service provider or supplier, as well as any screening providers who assist us with our legal obligations to conduct anti-money laundering, sanctions screening and regulatory checks.

## 6. WHAT DO WE USE YOUR PERSONAL DATA FOR?

We use your personal data for the following purposes:

- **Provision of services and products:** to provide products and business-related services and otherwise for the purposes of performing and managing our contracts efficiently, including chartering, trading, construction, operational and maintenance services, industry-relevant services, technology tools and other ancillary and related services;
- **Business relationship:** to manage and administer our relationship with you and/or your company or organisation, including keeping records about business contacts, services and payments so we can customise our offering for you, develop our relationship and target our marketing and promotional campaigns;
- **Incidents and investigations:** to provide information about an incident or allegation on board or at one of our vessels, installations, other assets or offices; and to investigate and comply with any applicable company, insurance or legal requirement;
- **Communication:** to send emails, newsletters, corporate publications and other messages that keep you informed about Seascale Energy;
- **Events:** to run and/or participate in events;
- **Surveys and feedback:** to solicit feedback from our business partners and in respect of events we participate in, as well as addressing any issues and concerns which may arise;
- **Legal compliance:** to verify your identity (where required) and undertake due diligence (under anti-money laundering, sanctions screening and other crime prevention and detection laws and regulatory requirements), which may involve automated screening checks to ensure that our business partners are genuine, and to prevent fraud, corruption or crime. We may not be able engage in business with you if you do not provide the information we need to conduct these checks;
- **Website monitoring:** to check our website and other technology services are being used appropriately and to optimise their functionality;
- **Site security:** to provide security to our vessels, project sites, offices and other premises (normally collecting your name and contact details on entry to our buildings, vessels and/or sites);
- **Online security:** to protect our information assets and technology platforms from unauthorised access or usage and to monitor for malware and other security threats;
- **Regulatory:** to comply with industry specific legal and regulatory obligations, including auditing and reporting requirements;
- **Business Partners:** to manage relationships with our business partners, including suppliers who deliver products and services to us; and
- **Legitimate interest:** to pursue the legitimate business interests listed in Section 8 (*What are legitimate interests?*) of this Policy below.

## 7. ON WHAT BASIS CAN WE USE YOUR PERSONAL DATA?

We may process your personal data for a number of reasons:

- (a) **where you have given us consent:** for example, where you share details for particular purposes. For employees, we will generally seek your consent through our onboarding procedures. In any other circumstances, consent may be sought using our applicable Consent Form [here](#);
- (b) **where it is necessary to comply with legal or regulatory obligations:** for example, anti-money laundering, sanctions screening, know your customer checks, regulatory requirements or disclosure to law enforcement; and

- (c) **where processing is necessary for our legitimate business interests or those of a third party:** provided this does not override any interests or rights that you have as an individual. Our legitimate interests are listed below.

## 8. WHAT ARE OUR LEGITIMATE INTERESTS?

We have legitimate business interests in:

- providing business-related services;
- managing our business and relationship with you and/or your company or organisation;
- understanding and responding to inquiries and feedback from our business partners;
- understanding how our business partners use our products, services and websites;
- identifying what our business partners want and developing our relationship with you and/or your company or organisation;
- improving our products, services and offerings;
- receiving information from affiliated businesses for shared business partners;
- enforcing the terms of our contractual agreements;
- ensuring our systems, vessels and premises are secure;
- managing our supply chain;
- developing relationships with business partners and customers;
- ensuring debts are paid; and
- sharing data in connection with acquisitions and transfers of our business.

## 9. SPECIAL CATEGORY DATA AND OUR REASONS FOR USING IT

During the course of our relationship with you (whether as an employer, service recipient or in any other capacity), we may need to collect and process certain sensitive personal data.

Sensitive personal data may include the following information:

- your racial or ethnic origins;
- religious beliefs;
- health-related data;
- biometric data processed solely to identify a human being;
- data concerning a person's sex life or sexual orientation;
- personal data relating to criminal convictions and offences or related security measures; and
- personal data relating to your children.

To the extent that such sensitive personal data is provided to us, we will only process it where:

- we have your explicit consent: for the particular processing;
- where you have manifestly made the data public: for example, where you have published it on social media;
- this is necessary to protect your vital interests or those of another person: for example, in medical emergencies;
- this is necessary to deal with legal claims: for example, involving court proceedings;
- this is necessary for substantial public interest: for example, to prevent or detect unlawful acts; and
- as permitted by applicable law: outside the EU and other jurisdictions where these restrictions apply.

We will take all appropriate measures to ensure the confidentiality and security of your sensitive personal data, in accordance with applicable data protection laws and regulations.

## 10. WHO DO WE SHARE YOUR DATA WITH?

We share your information with others as follows:

- Seascale Energy's **affiliates and subsidiaries**: including their directors, management, employees and contractors in order to provide our products and services;
- **Suppliers and business partners**: who support our business, including outsourced business, project and vessel support, agents, contractors, consultants, professional advisers, insurance providers, IT and communication suppliers, human resources, manning agents, recruitment and development support services, marketing and advertising agencies, travel agencies, data back-up suppliers and operations. Our suppliers and business partners have to meet minimum standards as to information security and they will only be provided data in line with their function;

- **Shared service centres:** operated by Seascale Energy or third parties, including for supplier on-boarding, insurance, communications, marketing and advertising services, human resource, recruitment and manning services, IT services, corporate secretarial and legal services, risk management and office support services;
- **Law enforcement bodies and our regulators:** or other competent authorities in accordance with legal requirements or good practice;
- **Appropriate parties in the event of emergencies:** to respond to an emergency; to protect the rights, property, security, health or safety of Seascale Energy, our customers, employees, users of our services or others or other third parties; or when we believe disclosure is necessary or appropriate to prevent physical harm, vessel/installation loss or financial loss;
- **Investigations:** in connection with an investigation of suspected or actual illegal activity; at the request of governmental authorities or shipping/port authorities conducting an investigation; or to verify compliance with, or enforce, our company policies or guidelines or a breach of any contractual arrangements;
- **Your company or organisation:** in relation to us providing our services;
- **Screening service providers:** so that we can comply with legal obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks;
- **Third parties:** in the context of the acquisition or transfer of any asset, part of our business or in connection with the business reorganisation; and
- **Other delegates:** where your name will appear on the attendee list for events where you have told us you plan to attend.

## 11. PERSONAL DATA ABOUT OTHERS

In some cases, you may provide personal data to us about other people (such as your customers, suppliers, contractors, directors, officers, employees, shareholders or beneficial owners). You must ensure that you have given those individuals an appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

## 12. SECURITY

In proportion to the sensitivity of your personal data, we maintain reasonable technical, administrative and/or physical safeguards and appropriate security measures to protect your personal data from loss, misuse or unauthorised access, disclosure, alteration or destruction. However, the electronic transmission or storage of information is not completely secure. As a result, we cannot guarantee the security of your personal data and any transmission is at your own risk. If an incident is reported affecting your personal data, we will investigate and comply with all required reporting obligations.

## 13. WHERE WILL YOUR INFORMATION BE HELD?

Seascale Energy is a joint venture equally owned by Cargill's Ocean Transportation business and prominent tanker shipping company, Hapag-Lloyd. As a leading provider of marine fuel solutions globally, Seascale Energy leverages the collective knowledge and experience of both companies, offering exceptional value to all segments of shipowners and maritime professionals around the world. As a result, we may share your information among Seascale Energy, our service providers and business partners and other third parties that may be located in countries outside your local jurisdiction or region.

Data protection laws vary by country and those applicable in the United States of America and elsewhere are not equivalent to those applicable in, for example, Singapore, the European Union or certain other jurisdictions. Seascale Energy will take appropriate measures to handle your information as described in this Policy and in accordance with locally applicable data protection requirements. Please contact us if you would like to understand these steps in greater detail.

## 14. HOW LONG DO WE KEEP YOUR DATA?

We generally keep your personal information for as long as it is needed to for the purposes for which it is collected. This will depend on a number of factors, such as whether you and/or your company or organisation are an existing business partner. We will also retain your information as necessary to comply with legal, accounting or regulatory requirements. The amount of time records are kept depends on the type of personal data they contain.

## 15. WHAT ARE YOUR RIGHTS?

If you are working with one of our EU entities or our entities in certain other jurisdictions where similar rules apply, you have certain rights in relation to your information. The availability of these rights and the ways in which you can use them are set out below in more detail.

Some of these rights will only apply in certain circumstances. If you would like to exercise or discuss any of these rights, please contact us in accordance with Section 21 (*How to contact us*) of this Policy.

- **Access:** you are entitled to ask us if we are processing your data; and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it.
- **Correction:** you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected.
- **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.

- **Restriction:** you are entitled to restrict us from processing certain of your personal data in certain circumstances, for example, if you want us to establish its accuracy or the reason for processing it.
- **Transfer:** you may ask us to help you request the transfer certain of your personal data to another party.
- **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party), you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal information for direct marketing purposes, for example to send you information about Seascale Energy.
- **Automated decisions:** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- **Consent:** where we are processing personal data based on your consent, you can withdraw your consent.

If you want to exercise any of these rights, please contact us in accordance with Section 21 (*How to contact us*) of this Policy.

You also have a right to lodge a complaint with a data protection supervisory authority, in particular in the jurisdiction where you are habitually resident, where we are based or where an alleged infringement of Data Protection law has taken place. In Singapore, you can make a complaint to the Personal Data Protection Commission (Tel: +65 6377 3131 or at [www.pdpc.gov.sg](http://www.pdpc.gov.sg)).

## 16. DIRECT MARKETING

As described above, you can opt-out of receiving information about Seascale Energy from us at any time.

We may use the information you give us on our website or other means for direct marketing purposes to provide emails, newsletters, corporate publications and other messages to keep you informed about Seascale Energy, including events that we think may interest you.

You can opt-out of receiving information about Seascale Energy from us at any time. You can do this by clicking on the "unsubscribe" link included at the end of any applicable email correspondence sent to you or by contacting us in accordance with Section 21 (*How to contact us*) of this Policy.

## 17. COOKIES

Our websites use cookies that identify your browser. They collect and store certain information when you visit our website. For more information about the use of cookies see [here](#).

## 18. LINKS TO THIRD PARTY WEBSITES

From time to time, our website, newsletters and published reports, social media publications and other communications may contain links to and from websites owned or maintained by other parties. Please note that any personal data that you provide through these websites is not subject to this Policy and the treatment of your personal data by such websites is not our responsibility.

If you follow a link to any other websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites.

## 19. CHILDREN

We do not knowingly collect information from children or other persons who are under 16 years old. If you are under 16 years old or are disclosing information about a person who is under 16 years old, you may not submit any personal data about yourself or such person to us without our prior written consent.

## 20. CHANGES TO THIS NOTICE

We reserve the right, in our sole discretion, to amend and/or delete in whole or in part this Policy at any time, without providing prior notice to you. The most current version of this Policy will be posted on our [website](#).

## 21. HOW TO CONTACT US

By submitting your personal data, you agree to Seascale Energy processing your personal data in accordance with the terms of this Policy.

If you have any questions about this Policy or would like more information about the way we manage your personal data, please contact our team by emailing [ag@SeascaleEnergy.com](mailto:ag@SeascaleEnergy.com) or contacting our office [here](#).