

# Contractor Privacy Statement

Dana Petroleum Limited and its subsidiary companies ("We", "Us" or "Our") are committed to protecting and respecting your privacy.

This Privacy Statement (the "**Statement**"), sets out the basis on which any personal data which We collect from you, or which is provided to Us, may be processed by Us. Please read this Statement carefully to understand Our views and practices regarding your personal data and how We will treat it.

This statement is intended to cover the personal data processed by the whole of the Dana group, which covers a number of jurisdictions. **For the avoidance of doubt the local applicable data processing rules will always apply to any personal data processed by Us within the relevant jurisdiction. As a result some aspects of this Statement will only apply to the applicable jurisdiction.**

By providing information during the course of undertaking your engagement with Us, you confirm that you understand that We will use your personal data in accordance with this Statement. This Statement supplements Our Data Protection Policy. In the case of inconsistencies between this Statement and the Data Protection Policy, this Statement will take priority.

Where applicable, for the purposes of Data Protection Legislation (as defined below), the data controller is Dana Petroleum Limited, King's Close, 62 Huntly Street, Aberdeen, AB10 1RS. If you have any questions, concerns or complaints about the terms of this Statement, or how We handle your personal data, please contact Our Head of Information Systems, who is contactable at [data.protection@dana-petroleum.com](mailto:data.protection@dana-petroleum.com).

In this Statement, "**Data Protection Legislation**" means all applicable legislation which relates to the protection of individuals with regard to the processing of personal data, including (where such law is applicable): (i) the General Data Protection Regulation (EU) 2016/679 (the "**GDPR**"); (ii) the UK GDPR (as defined in the Data Protection Act 2018) and / or any supplementary or replacement laws and regulation; (iii) the Data Protection Act 2018; (iv) Algemene verordenen gegevensbescherming; (v) Egypt Law No. 151 of 2020 Promulgating the Personal Data Protection Law and (iv) any other laws relating to the processing, privacy and use of personal data in any other territory as applicable.

## Information We May Collect and Process

We will only collect and process your personal information in accordance with and where applicable under the relevant Data Protection Legislation and jurisdiction.

We collect and process personal information held about you:

- when We are required to comply with a legal obligation;
- if the processing is for Our legitimate interests or those of a third party;
- when We have a contract with you that requires Us to process your data to comply with your obligations under the contract;
- for the purposes of preventive or occupation assessment;
- for the assessment of the working capacity of Dana staff;
- when We have a regulatory or industry requirement, e.g. offshore medical requirements;
- legal claims or judicial acts; and / or

- where We have your consent.

Where the personal data We collect from you is special category personal data (including health data and location data), We will only process this data to the extent We are permitted under the applicable Data Protection Legislation. Usually, We will process this data when it is necessary for the purposes of performing obligations which are imposed by law on Us in connection with Our role as your service engager, including health and safety laws.

We may collect and process information you give Us during the course of your employment or by other means of correspondence with you. This may, where applicable and as required within the relevant jurisdiction, include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and information about your dependants
- Next of kin and emergency contact information
- National Insurance number or equivalent
- Bank account details, payroll records and tax status information
- Remuneration, annual leave, pension and benefits information
- Start date and leaving date
- Location of employment or workplace
- Identification information (including a copy of driving licence, passport and utility bills)
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process, for further information please see the Recruitment Privacy Statement available at [www.dana-petroleum.com](http://www.dana-petroleum.com))
- Engagement related records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- Information about your use of Our information, IT and communications systems
- Professional qualifications, training and qualification information and PAX Vantage Number
- Photograph, video and CCTV footage

We may collect and process special category personal data only to the extent necessary and in accordance with the applicable jurisdiction. This may include:

- Information about your race or ethnicity, religious or other philosophical beliefs, sexual orientation and political opinions
- Information about your location
- Trade union membership
- Information about your health, including any medical condition, mental health, Covid-19 infection data, health and sickness records

More detail about how We may use your personal data, as well as the categories of personal data involved, is set out in the Appendix to this Statement.

Where we use such personal data We use this personal data primarily to comply with Our legal obligations (including regulatory requirements and in respect of health and safety), for equal opportunity monitoring, to manage sickness and administer your benefits.

We may, as necessary and in accordance with the applicable jurisdiction, also process special categories of personal data about you for the following key purposes:

- for the purposes of carrying out Our duty of care when engaging your services (whether directly or indirectly);
- We may require to process special categories of information about you in the establishment, exercise or defence of legal claims (for example, in the context of an employment tribunal case or a personal injury claim);
- for reasons of substantial public interest (for example, where such processing is required to monitor equal opportunities); and
- for the purposes of preventative or occupational medicine, including for conducting assessments of working capacity, for diagnosis and for the provision of treatment and care.

More detail about how We may use special categories of personal data, as well as the categories of personal data involved, is set out in the Appendix.

We will only use your personal information for the purposes for which We collected it as detailed above, 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, or We will seek your consent if required.

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.

#### Failure to Disclose

If you fail to provide information when requested, We may not be able to perform the contract We have entered into with you fully (such as paying you or providing benefits), or We may be prevented from complying with Our legal obligations (such as to comply with Our regulatory requirements or to ensure the health and safety of Our staff). This could even have consequences in terms of your continued engagement with Us.

#### Disclosure of Your Information

We may share your personal information with any member of Our group, which means Our subsidiaries, Our ultimate holding company and its subsidiaries.

We may share your information with selected third parties where required by law in the relevant jurisdiction, where it is necessary to administer the working relationship with you or where We have another legitimate interest in doing so, this may include:

- Occupational Health providers
- Logistic/ travel providers
- Management and data storage providers
- Government agencies, regulators and other authorities
- Relevant service providers
- Our co-venture partners
- Our auditors, Our legal and other professional advisors, Our banks, insurers and insurance brokers

- Our and your trade associations, professional bodies and business associates
- Potential purchasers of company assets or shares

At all times, We require third parties to respect the security of your data and to treat it in accordance with Data Protection Legislation.

### Storing or Transferring Your Personal Data

The data that We collect from you may be transferred to, stored at, or otherwise processed at, a destination outside the UK and the European Economic Area ("EEA"), as appropriate. It may also be processed by staff and third party contractors operating outside the EEA, as appropriate, who work for Us. We will take all steps necessary in accordance with Data Protection Legislation to ensure that your data is treated securely and in accordance with this Statement, in particular by ensuring that appropriate technical and organisational safeguards are in place for the processing.

### How Long We Will Keep Your Information

We review Our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (We may be legally required to hold some types of information), or as set out in any relevant contract We have with you. We will generally keep your information for as long as is necessary to fulfil Our obligations to you after which this will be destroyed or deleted if it is no longer required for the reasons for which it was obtained. To determine the appropriate retention period, We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which We processed the personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

### Your Rights

Under Data Protection Legislation, you may (as applicable in the relevant jurisdiction) have the following rights in connection with your personal data, which can be exercised at any time. These rights may be exercised in accordance with, and subject to, Data Protection Legislation:

- **Right of access:** you can request a copy of the personal information We hold about you and check We are processing it lawfully;
- **Right to rectification:** you can request that any incomplete or inaccurate information We hold about you is corrected;
- **Right to erasure:** you can request that We delete your personal information where there is no good reason for Us to continue to process it. You must provide valid reasoning for your request. This can be exercised in conjunction with the right to object (see below);
- **Right to object:** you can object to Our processing of your personal information where we are processing on the basis of Our 'legitimate interest' or that of a third party. We shall cease processing your personal data unless there are compelling and legitimate grounds for processing which override your interests;
- **Right to restrict processing:** you can request that We restrict Our processing of your personal information. Information will be retained but not further processed;
- **Right to data portability:** where processing of personal data is carried out by automated means, you can request the transfer of your personal information to another party;
- **Right to withdraw consent:** where We are processing your personal data on the basis of consent, you have the right to withdraw your consent at any time;
- **Right to not be subject to decision making based on automated processing:** you shall have the right to not be subject to decision making based solely on automated means including profiling; and

- **Right to complain:** you may have a right to lodge a complaint with a Supervisory Authority, which is an independent public authority established in the United Kingdom and each EU member state in accordance with Data Protection Legislation. The Supervisory Authority for data protection issues in the United Kingdom is the Information Commissioner's Office. The Supervisory Authority in the Netherlands is the Autoriteit Persoonsgegevens.

If you would like to exercise any of your rights, please use the contact details listed above or, in the case of the right to complain, please contact the relevant Supervisory Authority. In the United Kingdom, the Information Commissioner's Office can be contacted via their website - [www.ico.gov.uk](http://www.ico.gov.uk). In the Netherlands the Autoriteit Persoonsgegevens can be contacted via their website - <https://autoriteitpersoonsgegevens.nl/nl>

### Changes to this Statement

We reserve the right to update this Statement at any time, and We will provide you with a new Statement 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.

**If you have any questions about this Statement, please contact the Head of Information Systems at [data.protection@dana-petroleum.com](mailto:data.protection@dana-petroleum.com).**

## The Appendix

Some aspects of this Appendix will only apply to the applicable jurisdiction:

No.	Purpose for Processing	Categories of Personal Data	Legal Basis
1.	For the administration of your engagement	Full name, date of birth, job title, residential address, email address, telephone number, national insurance number, bank account information, trade union membership, next of kin information, PAX Vantage Number or other identifying numbers, qualifications and training information	Performance of a contract and in performance of Our obligations and / or exercise of Our rights as your contracting party
2.	The recruitment and selection process	Full name, date of birth, residential address, email address, telephone number, national insurance or equivalent number, CV, employment history, references and qualifications and training.	Pursuance of Our legitimate interests to ensure staff recruited are appropriately qualified and to comply with regulatory requirements for staff
3.	Checking you are legally entitled to work in the applicable jurisdiction	Full name, date of birth, passport number, visa information.	Compliance with legal obligations.
4.	Paying you and, if you are within the applicable tax regime, deducting tax and National Insurance contributions or other applicable levy	Full name, date of birth, national insurance number or equivalent, bank account information.	Performance of a contract.
5.	Conducting performance reviews, managing performance and determining performance requirements	Full name, job details and performance information.	Pursuance of Our legitimate interests to ensure staff are performing well, to help Us address any performance issue for compliance with Our obligations under Our contract with you.
6.	Making decisions about remuneration reviews and compensation	Full name, job details, salary information and performance information	Pursuance of Our legitimate interests and to comply with Our contract with you.
7.	Recording health and safety incidents	Full name, health information (as is	Pursuance of Our legitimate interests, in

No.	Purpose for Processing	Categories of Personal Data	Legal Basis
		relevant to the specific incident, such as injury sustained or any underlying health conditions), employing entity, location at time of incident, picture, video or CCTV.	compliance with legal obligations, and as necessary to exercise Our rights as your employer.
8.	Occupational health services	Full name, date of birth, residential address, job title, email address, telephone number, health information (including any medical condition, health and sickness records).	As necessary for the purposes of preventive or occupational medicine, sometimes sharing of occupational health services will require your consent
9.	Pensions and benefits administration (where applicable)	Full name, date of birth, residential address, national insurance number or equivalent, pension scheme details. Some benefits may require Us to process health information, although in many cases employees will provide this directly to the benefit provider and not to Us.	To comply with Our legal obligations to perform Our contract with you which obliges Us to provide you with certain benefits. Some benefits may not be legally obliged but are offered to contractors for their benefit.
10.	Disciplinary matters, staff disputes, employment tribunals	Full name, job details, performance information, picture, video or CCTV footage, location information and information about the disciplinary matter	To exercise Our rights as an employer and possibly in the pursuit or defence of legal claims, or where We have a legitimate interest, e.g. in the case where you have a services contract with Us in your role as a contractor.
11.	Staff training and development and business development	Full name, position, training qualifications, contact details, photograph and videos	To perform Our obligations as an employer to ensure staff are adequately trained, to comply with legal obligations (such as health and safety regulations which require certain roles to have training in safety management areas), or to meet Our contractual obligations to you, and sometimes in pursuance of Our legitimate interests.

No.	Purpose for Processing	Categories of Personal Data	Legal Basis
12.	Monitoring use of company devices and IT systems	Information contained in emails and stored on company devices and on cloud based or supplier systems.	It is in Our legitimate interests to ensure that devices issued by Us are used appropriately; it is also necessary for Our legitimate interests in ensuring information security.
13.	Vetting, including background checks and identity checks	Full name, date of birth, residential address history (including current address), email address, telephone number, national insurance number or equivalent,	To comply with legal obligations and as necessary to exercise Our rights as an employer or performance of a contract entered into with you (as applicable)..
14.	Health assessments for fitness to work	Full name, health information (including any medical condition, health and sickness records).	To comply with legal obligations, and as necessary to exercise Our rights as an employer or performance of a contract entered into with you (as applicable).
15.	Assessing Our performance against equality objectives as set out by the Equality Act 2010 or equivalent (where applicable) and Our own diversity and inclusion monitoring.	Information about your race or ethnicity, religious or other philosophical beliefs, sexual orientation, political opinions and trade union membership.	To comply with legal obligations to monitor and measure equal opportunities or where We have a legitimate interest.