

## **1 INTRODUCTION**

This Privacy Statement provides information on the processing of personal data of the employees of SBM Offshore Amsterdam B.V. and/or its affiliates (hereinafter: 'SBM Offshore', 'we' or 'us'). It indicates which personal data may be collected, used, disclosed and stored by SBM Offshore on which legal grounds and for which purpose(s), and to which persons data may be provided. This Privacy Statement may be changed over time; the current version at any time can be retrieved from SBM Offshore's intranetsite SBMOnline.

## **2 WHEN DOES THIS PRIVACY STATEMENT APPLY**

This Privacy Statement is applicable to the processing by SBM Offshore of personal data of its employees (current and former), temporary workers working under direct supervision of SBM Offshore (e.g. independent contractors and trainees) and (former) Management Board or Supervisory Board members of SBM Offshore or similar executive roles to SBM Offshore (hereinafter each referred to as an 'employee').

Personal data includes non-public personal information of an individual that can include, without limitation, the individual's social security number, driver's license number (or other government-issued identification number), date of birth, home address, personal telephone number, email addresses, citizenship/national origin information, bank account information, chamber of commerce and VAT details, recruitment information (such as employment history and education), job and position data, work permit data, availability details, terms of employment details, tax details, payment details, insurance details and location and organizations details, medical information and background check reports.

SBM Offshore subsidiaries may have their own local version of a Privacy Statement to meet local legislation or standards. The rationale behind these local statements is aligned with the global statement but differences may exist on a more detailed level due to local legislation. In case of conflict between the global and local Privacy Statements, local statements will govern.

### **3 WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA**

SBM Offshore N.V. and its subsidiaries are the controller of the personal data that fall within the scope of this Privacy Statement. When processing your personal data, SBM Offshore is committed to ensuring compliance with applicable data protection laws and regulations. The Privacy Office of SBM Offshore is responsible for overseeing this Privacy Statement.

### **4 ON WHICH LEGAL GROUNDS AND FOR WHICH PURPOSES MAY SBM OFFSHORE PROCESS YOUR PERSONAL DATA**

SBM Offshore ensures that your personal data are only processed for either of the following legal grounds: (i) to comply with a legal obligation, (ii) when necessary in the context of a contract, (iii) for SBM Offshore's legitimate interests, (iv) to protect an individual's vital individual interests. When processing your personal data SBM Offshore ensures compliance with data protection laws. This clause 4 addresses the legitimate purposes for which we may process personal data in more detail as set out in the Sections below.

#### **4.1 For recruitment and hiring purposes**

##### What does this purpose entail?

We may have gathered personal data in connection with the recruitment and hiring process for your function in accordance with our Privacy Statement to Job Applicants. If you have been successful in your application, the personal data processed in connection with the recruitment and selection process will be retained for the purposes and subject to the terms and conditions of this Privacy Statement to Employees.

#### **4.2 To offer you suitable possibilities for your development**

##### What does this purpose entail?

SBM Offshore uses the information stored in its HR systems to offer you suitable possibilities for development. This way, we are able to offer you the right training, education, coaching or other forms of career guidance or personal development to suit your needs. We also use your personal data for general career and talent development.

##### Which personal data do we process for this purpose?

For this, we process without limitation your contact details, recruitment information (such as employment history, education history details), job and position data, location and organizations, data generated during the performance of the employment contract, correspondence with SBM Offshore with regard to job applications (including references, absence and leave information).

For what period do we retain your personal data for this purpose?

Except as otherwise permitted or required by applicable (local) law or regulatory requirements, SBM Offshore endeavors to retain this personal data only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

**4.3 For human resources, personnel management and payroll administration**

What does this purpose entail?

We collect, use and store without limitation your personal data for human resources, personnel management and payroll purposes. This includes, without limitation, collecting, using and storing your personal data for purposes of maintaining your personnel file, for benefit purposes, for leave of absence purposes, for payroll purposes, and for purposes of booking and reimbursing business-related travel and expenses. In addition, your personal data may be disclosed to third parties in connection with this purpose, including, but not limited to, third party service providers (e.g., financial, tax or legal advisors, SBM Offshore's insurance providers, SBM Offshore's third-party leave administrator, and/or travel agencies) and governmental agencies and entities in accordance with applicable laws and regulations.

Which personal data do we process for this purpose?

For this, we can process your contact details, date of birth, gender, civil status, nationality, photographs, videos, citizen service number, ID card or passport details, declaration of employment status, chamber of commerce and VAT details, recruitment information (such as employment history, education history details), job and position data, work permit data, availability details, terms of employment details, tax details, payment details, hours worked details, personnel file details, insurance details, location and organizations, beneficiaries and dependents, account/profile data (corporate ICT- systems), data generated during the performance of the employment contract, correspondence with SBM Offshore with regard to job applications, including references, absence and leave information.

For what period do we retain your personal data for this purpose?

Except as otherwise permitted or required by applicable (local) law or regulatory requirements, SBM Offshore endeavors to retain this personal data only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

#### **4.4 To protect your vital interests**

##### What does this purpose entail?

When it is necessary to process your personal data to protect your vital interests, we will do so. This could, for example, be the case when you have a medical condition that prevents you from or that restricts you in performing certain activities.

##### Which personal data do we process for this purpose?

For this, we process your contact details, relevant personnel file details, insurance details, location and organizations and the relevant health data that you provided to SBM Offshore.

##### For what period do we retain your personal data for this purpose?

Except as otherwise permitted or required by applicable (local) law or regulatory requirements, SBM Offshore endeavors to retain this personal data only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

#### **4.5 To monitor and investigate compliance within SBM Offshore policies and regulations**

##### What does the purpose entail?

SBM Offshore can monitor employee accounts to check compliance with SBM Offshore's policies and regulations, such as the IT Code of conduct. You can find SBM Offshore's policies and regulations on our intranet. SBM Offshore may also monitor your use of its networks, systems and information to observe compliance with its policies. We may do so irrespective of whether you use SBM Offshore IT devices or your own devices to access or use SBM Offshore's information, network or systems.

SBM Offshore will not trail individual employees by default without informing you specifically or without prior consent, but only if it receives signals of irregularities. If an employee is suspected of behavior or actions that are not compliant with SBM Offshore's policies and regulations, SBM Offshore could instigate an internal investigation and generate and process additional personal data without informing you upfront. We could, for example, instigate such an investigation in case of a prohibited transfer of any of SBM Offshore's trade secrets, confidential information, intellectual property or knowhow and/or fraud.

##### Which personal data do we process for this purpose?

For this purpose, we can process account/profile data (corporate ICT-systems), such as the time and date of your logins, the type of information and files shared, the search queries that are made and the type of device your use, the mobile number of your device,

IP addresses, MAC addresses, documents accessed and duration of access, mobile network information, your mobile operating system and which mobile browser you use, your time zone settings and device details.

If an SBM Offshore employee is suspected of behavior or actions that are not compliant with SBM Offshore's policies and regulations we will use more specific content and traffic data for internal investigations. We use this personal data to make legal decisions and to conduct legal proceedings. Such data includes: your internet communications (including social media), sent and received email messages, printed documents, storage devices (USB sticks, portable hard drives) and data on back-ups.

For what period do we retain your personal data for this purpose?

Except as otherwise permitted or required by applicable (local) law or regulatory requirements, SBM Offshore endeavors to retain this personal data only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

**4.6 To comply with the law**

What does this purpose entail?

In some cases, SBM Offshore collects, uses, and stores your personal data to comply with applicable laws and regulations. This could be the case for obligations outlined in Section 4.1 through Section 4.5, as well as other obligations not expressly outlined in this policy. In addition, SBM Offshore may need to disclose your personal data to governmental agencies or entities in accordance with applicable laws and regulations.

Which personal data do we process for this purpose?

We may process without limitation your contact details, date of birth, gender, civil status, nationality, citizen service number, ID card or passport details, declaration of employment status, chamber of commerce and VAT details, job & position data, work permit data, terms of employment details, tax details, payment details and location and organizations.

For what period do we retain your personal data for this purpose?

Except as otherwise permitted or required by applicable (local) law or regulatory requirements, SBM Offshore endeavors to retain this personal data only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). Instead of destroying or erasing your personal information, we may make it anonymous such that it cannot be associated with or tracked back to you.

## 4.7 For other legitimate business purposes

### What does this purpose entail?

SBM Offshore may process your personal data for legitimate business purposes beyond those specifically stated in Section 4.1 through Section 4.6. Such legitimate business purposes may include, without limitation, (i) protecting HSSE, Ethics & Compliance; (ii) management reporting purposes in the context of mergers, acquisitions and divestitures; (iii) allowing you to perform your tasks in the regular course of business, and (iv) HR analyses to facilitate better decision making.

SBM Offshore may need to disclose your personal data for legitimate business purposes to the third parties identified in Section 5.2 below.

### Which personal data do we process for this purpose?

For this purpose, we may collect, use, disclose, and store, without limitation, your social security number, driver's license number (or other government-issued identification number), date of birth, home address, personal telephone number, personal email address, citizenship/national origin information, bank account information, medical information, consumer reports, contact details, date of birth, gender, job & position data, account/profile data (corporate ICT-systems), content and traffic data (such as your internet communications, sent and received email messages, printed documents, storage devices), data on back-ups and relevant data generated during the performance of the employment contract.

### For what period do we retain your personal data for this purpose?

Except as otherwise permitted or required by applicable (local) law or regulatory requirements, SBM Offshore endeavors to retain this personal data only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

## 5 WHO HAS ACCESS TO YOUR PERSONAL DATA

### 5.1 Access to your personal data within SBM Offshore

Your SBM profile information can be viewed by all SBM Offshore employees, eg. Through the global address book, the Who is Who app and the SBM app for mobile phones.

All other personal data can only be accessed by relevant SBM Offshore departments: (1) as permitted in the proper performance of their duties for SBM Offshore; (2) as permitted in the ordinary course of SBM Offshore's business for legitimate business purposes; or (3) as otherwise required by applicable laws and/or regulations.

## 5.2 Access to your personal data by third parties

SBM Offshore may disclose personal data to third parties for and in connection with the purposes described in this policy. These third parties may include:

- Third party service providers for and in connection with the provisioning of their services to SBM Offshore such as financial, tax or legal advisors, SBM Offshore's insurance providers, SBM Offshore's third-party leave administrator, and/or SBM Offshore's travel agencies;
- Business partners for and in connection with the provisioning of services between SBM Offshore and such business partners; and
- Government agencies or entities as required by applicable laws and regulations.

SBM Offshore will comply with applicable laws and regulations in disclosing personal data to third parties and commits itself to ensure that the personal data is adequately protected and processed exclusively for the permitted purposes.

## 5.3 The use of your personal data by data processors

When a third party processes your personal data solely following SBM Offshore's instructions, it acts as a data processor. In the performance of its contract with SBM Offshore, such third party shall be required to process the personal data exclusively for the permitted purposes and to comply with applicable data protection laws and regulations.

## 5.4 Transfers of personal data

Where the personal data is transferred to subsidiaries of SBM Offshore N.V. or to authorized third party service providers we take organizational, contractual and legal measures to ensure that the personal data is exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard the personal data.

## 6 HOW ARE YOUR PERSONAL DATA SECURED

SBM Offshore is committed to the protection of your personal data. SBM Offshore has taken adequate safeguards to ensure the confidentiality and security of your personal data. SBM Offshore has implemented appropriate technical, physical and organizational measures to protect personal data against unauthorized or unlawful disclosure, access, loss, damage or alteration.

In addition, SBM Offshore has adequate safeguards in place for the proper disposal of files and documents containing personal data, including, without limitation, the requirement that physical files and documents containing personal data be shredded or placed in the secured shredding containers at its facilities for proper disposal.

In the event of a data breach, SBM Offshore will notify the relevant authorities and the involved employees if their personal data have been exposed to risk, such subject to and in accordance with the provisions of applicable data protection laws and regulations.

## **7 YOUR ROLE, QUESTIONS AND CONTACT INFORMATION**

Please help us keep your personal data records accurate and up to date. Accordingly, please notify Human Resources immediately if there is a change in your personal data.

You can contact your local HR department to request access to your personal data or to request correction or deletion of the personal data (but only where it is no longer required for a legitimate business purpose).

If you have any questions regarding this Privacy Statement or its implementation within SBM Offshore, please contact [privacyoffice@sbmoffshore.com](mailto:privacyoffice@sbmoffshore.com).