

Nigeria Privacy Statement

WHO WE ARE

This is the privacy statement of **Shelf Drilling Nigeria**, Limited and other Shelf Drilling entities operating in Nigeria (collectively “**Shelf Drilling**” or “**we**” or “**us**”), from time to time. In this privacy statement references to our website refers to <https://www.shelfdrilling.com/>.

Local Privacy Notice

This notice sets out the general data processing practices of Shelf Drilling in Nigeria. It applies to personal information processed by us.

What Personal Information We Collect And Use

In this notice, **personal information** means personal data about you from which you can be identified which we have grouped together as follows:

- **Identity Data** includes name, gender, age, date of birth, nationality and national identification number.
- **Contact Data** includes contact information, such as address, email address, and mobile phone number.
- **Usage Data** includes information about how you use Shelf Drilling website, products and services.
- **Image Data** includes CCTV images and other information we collect when you are on our premises.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Communications Data** includes details of your interactions with us, and other similar information or correspondence relevant to the interaction or relationship, as applicable.
- **Special categories of personal data** means, personal information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; genetic data; or biometric data for the purpose of uniquely identifying you. We do not collect any special categories of personal data nor any information about criminal convictions or offences.

Your personal information does not include personal data where identifiers that associate that data with you have been removed. We term this **anonymous data**.

We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal information but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

Where Your Personal Information Comes From

We may collect information about you from the following sources:

- directly from you;
- indirectly from people who provide it to us (for example, your employer or adviser, or third-party service providers that we use to help operate our business);
- publicly available resources; or
- the internet and social networking sites, such as LinkedIn.

Basis For Using Your Personal Information

If we process your personal information this includes collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

The table below sets out our legal grounds and reasons for processing your personal information. Where we rely on legitimate interests for processing, the table below explains the relevant legitimate interest.

Generally, we do not rely on consent as a legal basis for processing your personal information except where applicable law requires this. Where required, you may be asked to provide your consent by appropriate and permitted means. Where you have given consent, this can be withdrawn at any time by contacting privacy.nigeria@shelfdrilling.com.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver our services and communicate with you including to respond to your requests or inquiries and solicit further information as appropriate and/or necessary	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract with you
To manage our relationship with you which will include: (a) Sending you information about our products and services	<ul style="list-style-type: none"> • Identity • Contact • Image 	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how

(b) Notifying you about changes to our terms or privacy policy (c) Verify your identity		customers use our products/services)
To maintain the security of our Services, for fraud detection, and to protect our rights	<ul style="list-style-type: none"> • Identity • Contact • Technical • Image 	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, crime and corruption and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
To better understand and analyse our customer population, support our operations including inventory and product management, to improve our products and services	<ul style="list-style-type: none"> • Technical • Usage 	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To secure our premises	<ul style="list-style-type: none"> • Image 	Necessary for our legitimate interests in effective security of our premises to prevent and detect crime

We do not process personal information by automated means.

Sharing Your Personal Information With Third Parties

We may share your personal information with the following third parties if this is required by law; necessary to enter a contract with you; where we have a legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- **Affiliates:** We share your personal information with affiliated legal entities within the Shelf Drilling family of companies for internal administrative purposes and uses that are consistent with this notice such as for customer/vendor account management, processing financial transactions, obtaining professional advice, corporate activity or restructuring of the business and managing reporting, performance and services within the Shelf Drilling group.
- **Service Providers:** We may share your personal information with third-party service providers who perform services on our behalf or for your benefit, such as for payment processing, marketing and analytics and our IT hosting provider.
- **Professional advisors:** We may share your personal information with our

professional advisors, including our legal, tax and accountancy service providers.

- **Business transfers:** Your personal information may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Business partners:** We may share your personal information with business partners, such as our customers or collaborators.
- Other third parties as necessary to comply with the law such as our regulators.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

If You Don't Provide Your Personal Information

If you choose not to provide, or object to us processing, the information we need, we may not be able to deal with you to provide some or all of our services or information to you.

International Data Transfers

We may transfer your personal information with our affiliates and/or to third parties see *Sharing your personal information with third parties* – which may involve your personal information being transferred to, stored, or processed in a country other than the one in which it was collected.

If we do so, we will comply with applicable law regarding such transfers. Where such transfers require appropriate or suitable safeguards recognized under privacy laws, we may rely on them. Typically, these which include:

- **Adequacy decision:** We may transfer your personal information to countries which the relevant regulator or government has approved as providing adequate protection to personal information.
- **Approved contracts:** We may be entitled to put in place a contract with the recipient of your information which requires them to protect that information to the same standards as if the information were being processed within the country where it originated.
- **By contract:** In respect of certain cross-border transfers, we will transfer your personal information outside your country / region if the transfer is necessary to the performance of a contract between you and us, or if the transfer is necessary to the performance of a contract between us and a third party, and the contract was entered into in your interest.

- **With your consent:** In respect of certain cross-border transfers, we will obtain your consent to transfer your personal information outside your country / region after first informing you about the possible risks of such a transfer.

The safeguards we use will depend on the location of the recipient, the function they are performing, and the personal information being transferred. You can request more information by contacting us as set forth in the *Contact information* section below.

How Long We Keep Your Personal Information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In general terms, we will retain personal information about you for the duration of our relationship with you and afterwards for any period required by applicable law or until the time period in which legal claims could be brought has expired. In a global organisation such as ours, the rules that apply to determine how long it is appropriate to hold records for particular matters can be complex and varied. If you wish to know how long we may hold your particular personal information then please e-mail privacy.nigeria@shelfdrilling.com.

Your Rights

Under local privacy laws, you may have certain rights as regards your personal information. These may include:

- Receiving certain information about our processing;
- Requesting access to your personal information that we hold (often known as a **data subject access request**);
- Requesting transfer, correction, deletion, restriction of processing;
- Objecting to processing;
- Requesting a copy of an agreement transferring personal information outside of the country of origin;
- Requesting a copy of your personal information in a structured, commonly used and machine readable format (often known as a **data portability request**);
- Being notified of a personal data breach;
- Complaining to a data protection regulator; or
- Withdrawing your consent to processing (if we process your personal information on the basis of your consent).

Please note that, in certain cases, we may continue to process your personal information after you have withdrawn consent or requested that we delete your personal information, if we have

a separate legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation.

Where you have any of these rights under applicable privacy law, we will comply with them. Please note, however, that the scope and detail of particular rights are governed by the law under which they arise and these rights may be qualified and so are not absolute.

No fee usually required

You will not normally have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. To submit a request, please contact us as set forth in the *Contact information* section below.

How do we ensure protection of your personal data?

We use appropriate measures and safeguards (including physical access controls and secure software and operating environments) to keep your personal data confidential and secure. These safeguards are regularly reviewed to protect against unauthorized access, disclosure, and improper use of your information, and to maintain the accuracy and integrity of that data. Do note, however, that these protections do not apply to information you choose to share in public areas such as third-party social networks.

Personal Data Breach Notification:

Where required under the NDPA or any other applicable law, we will inform relevant authorities and if necessary affected individuals of personal data breach within 72 hours or within such time as maybe stipulated, of being aware of the breach, where personal data breach refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

Contact Information, Further Advice And Complaints

If you have any questions about this privacy statement or how we handle your personal information; wish to make a complaint about how we are using your personal information; or

wish to exercise any of your rights, you can contact us by sending an email to privacy.nigeria@shelfdrilling.com.

Under the NDPA you have a right to complain to the data protection supervisory authority Nigerian Data Protection Commission.

Changes To This Privacy Statement

This privacy statement will be subject to regular internal review and any updates will be placed on our website.

Paper copies of the privacy statement may also be obtained by sending a request to privacy.nigeria@shelfdrilling.com

This privacy statement was last updated on 26 October 2023.

Legal Information

Shelf Drilling Nigeria Limited and **Shelf Drilling Offshore Services Limited** are companies incorporated in Nigeria (registration numbers RC1003863 and RC 1105524 respectively) having its registered office at 25 Abike Suleiman Street Lekki Phase 1, Lagos Nigeria.