

## **Nigeria Privacy Statement (HR)**

### **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. Shelf Drilling Nigeria office is located at 25 Abike Suleiman Street, Lekki Phase 1, Lagos Nigeria.

### **What Personal Information We Collect And Use**

This privacy statement explains how we collect, hold, record, use, amend, destroy, and disclose your personal information in the context of your employment or engagement with us.

In this privacy statement, ‘personal information’ means your personal data, i.e., information about you from which you can be identified or are identifiable. Your personal information does not include personal data where identifiers that associate that data with you have been removed.

It is important that your personal information is accurate and up to date. Please keep us informed if your personal information changes during your employment or engagement with us. Any changes to your personal information should be notified to Human Resource Department of Shelf Drilling.

We process your personal information during and after your employment or engagement with us. This includes collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

The types of personal information we will process about you will vary depending on the nature of our relationship with you but may include, but not limited to:

- Name, title, age, date of birth and gender
- Home address
- Personal contact details
- Nationality
- Marital status and dependants
- Next of kin and emergency contact information
- Job title / role
- Offer letter and contract of employment / contract for services.
- Documentation confirming your right to work.
- Start date and, if different and relevant to the country in which you work, the date on which your continuous employment with us commenced.
- Work location or place of employment

- Professional memberships and qualifications, professional certificates, approvals, or licenses where applicable including offshore survival certificates)
- Bank account details
- Payroll information and wage records, tax status information, compensation history, expense details, salary, and benefits details, including retirement savings, pension, and bonus details.
- Tax and national insurance details, including national insurance number and social security number.
- Absence records (excluding data disclosing sickness and health information)
- Hours worked, overtime, shift records, swipe card records.
- Holiday entitlement and holiday records
- Training records
- Travel booking details, including passport numbers, expiration dates and copies, frequent flyer account details, seat preferences, home airport locations and travel itineraries
- Performance, disciplinary and grievance information
- CCTV footage
- Photographs
- Information about your use of Shelf Drilling's information and communications systems
- Leaving date and your reason for leaving

We also process personal information about you that is created by you and others and stored on our IT and communication systems. This would include information contained in the e-mails and other communications you write and receive.

### **Special Categories Of Personal Information**

We may also process the following special categories of personal information about you:

- Information about your race or ethnicity, religious belief, sexual orientation and political opinions
- Trade union membership
- Information about your health including any medical condition and sickness records
- Biometric data for the purpose of uniquely identifying you

We only collect these types of information where we need to and if the law allows us to. The legal basis that we rely on to collect special categories of personal information are detailed below.

## **How Your Personal Information Is Collected**

During your employment or engagement with us, we will collect personal information about you as follows:

- The information provided to us by you
- Health information from medical professionals including occupational health providers and/or as a part of Shelf Drilling's benefits program(s)
- Information provided to us by other employees, directors, contractors, agents, clients, suppliers and/or customers
- Licensing and certifications from the organizations providing them
- In the course of job-related activities throughout the period you work for or are engaged by Shelf Drilling

## **How We Use Your Personal Information**

We may use your personal information to:

- contact you
- verify your identity and use as reference
- determine your eligibility for employment or engagement in the relevant jurisdiction
- determine the terms on which you will undertake work for Shelf Drilling
- determine your tax status
- make decisions about your continued employment or engagement and make arrangements for the termination of our working relationship with you
- make decisions about your remuneration and compensation
- perform our obligations and exercise our rights under your terms or contract of employment or engagement
- perform any obligations and exercise any rights imposed or conferred on us by law in connection with your employment or engagement
- comply with applicable laws, regulations and other governmental requirements
- manage sickness absences, and requests for absences from work, in respect of employees (including medical appointments; maternity, paternity, adoption, parental and/or shared parental leave; time off for dependents; trade union duties; bereavement; and / or jury service) and communicate with our relevant benefit providers or other insurers in respect of our employees
- manage flexible working applications from employees

- assess fitness to work; and consider disability status and reasonable adjustments for employees who may require this
- provide all necessary medical care to individuals who require it when working on one of our offshore installations
- provide and process payments and benefits including, if you are an employee, deducting tax and other contributions as required by law or elected by you
- maintain records of working time, holidays, and working time opt-out agreements and other aspects of employee's employment with us
- provide access to and use of our IT and communications systems and to monitor use of these systems (e.g., your email communications)
- monitor actions on Shelf Drilling premises and offshore installations through CCTV
- prevent and detect crime, fraud or corruption
- conduct business operations, management, planning and promotion, including accounting and auditing
- conduct performance reviews, manage performance and determine performance requirements for employees
- conduct disciplinary proceedings in respect of employees, compliance reviews and investigations
- conduct education, training and development in respect of employees
- conduct grievance proceedings in respect of employees
- conduct equal opportunity monitoring in respect of employees
- comply with the law
- comply with the requirements of a regulator
- inform your contacts in the event of sickness, accident or other emergency
- provide verification of your employment or engagement with us
- establish, exercise or defend legal claims
- facilitate an actual or potential sale or restructuring of our business
- otherwise manage and administer your relationship with us and deal with any issues arising from it or in connection with it

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations. Any failure may result in the contract being terminated (for contractors) or the taking of disciplinary action (for employees).

## The Legal Basis For Processing Your Personal Information

Depending on what personal information you provide and the context in which you provide it, we rely on one or more of the following lawful grounds for processing your personal information:

- **Consent** – in cases where this is appropriate, where you have agreed to us processing your information for a specific reason
- **Contractual performance** – the processing is necessary to enter into or carry out your contract of employment or engagement
- **Legal requirements** – to comply with our legal obligations
- **Legitimate interests** – the processing is necessary for our legitimate interests such as:
  - For business management
  - For workforce planning
  - To review equality of opportunity or treatment
  - To ensure compliance with our policies and procedures
  - To ensure compliance with our confidentiality obligations to customers
  - To ensure network and information security, including checking for viruses, preventing unauthorised access to our information and communication systems, preventing malicious software distribution, or to find or retrieve lost messages
  - To verify the identity of individuals accessing our premises
  - To prevent and detect theft
  - Business promotion and marketing of our services
  - To be informed in the event of sickness, accident or other emergency
  - To facilitate an actual or potential sale or restructuring of our business
- **Where we process special categories of personal information** –we rely on the following legal grounds for processing special categories of personal information. These are:
  - To exercise or perform employment law rights or obligations
  - To prevent or detect unlawful acts
  - To protect the public against dishonesty
  - For health or social care
  - To establish, exercise or defend legal claims
  - To review equality of opportunity or treatment

- To protect the vital interests of you or another person in either case if you are incapable of giving consent.

We may also rely on explicit consent, in cases where this is appropriate.

### **Sharing Your Personal Information**

In the course of processing your personal information for the purposes described above, we may disclose that information to:

- tax authorities and/or collectors
- our regulators
- other entities in the Shelf Drilling group of companies
- our service providers, including payroll and retirement savings and pension administrators, IT service providers, providers of staffing solutions, occupational and other health providers including but not limited to those involved in the provision of medical care, travel agents/bookers and those involved in providing benefits to employees
- our professional advisors (including legal counsel, tax advisors, accountants, and auditors)
- our shareholders including to comply with compulsory reporting requirements
- the public for business promotion purposes
- potential or actual purchasers of the business, or other third parties in the context of a possible sale or restructuring of the business.
- any person specified by you – for example, where you ask us to provide a reference or other information to that person
- other third parties where necessary to comply with legal obligations upon us

### **International Data Transfers**

We process personal information in countries around the world where we have operations. During business operations, personal data that we collect may be hosted, stored or otherwise processed in and transferred to third countries as we (as well as our service providers) manage servers in various locations. We may transfer your personal information to countries outside Nigeria to operate our business and/or to comply with legal obligations. However, in such cases, we will take appropriate measures to safeguard your personal information in a way that complies with relevant data protection laws. To ensure that these transfers are in line with permissible conditions outlined by the Nigerian Data Protection Regulation, we have taken appropriate and suitable safeguards to ensure that personal data will remain protected when cross-border transfers occur.

### **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. Given that we operate on a global basis, the relevant periods for which we hold personal information may vary according to the requirements of local laws but, in general

terms, we will only retain your personal information for periods required or permitted by law or, more generally, for the period of your employment or engagement and thereafter for so long as is required to allow us to establish, exercise or defend legal claims.

### **Automated Decision-Making**

We do not envisage that any decisions will be taken about you using automated means. If this position changes, you will be notified.

### **Your Rights In Respect Of Your Personal Information**

Examples of the types of rights you may have as regards your personal information are as follows:

- **Access to your information** – you have the right to request a copy of the personal information about you that we hold.

- **Correcting your information** – you have the right to ask us to correct your personal information if you believe it is not accurate, complete or up-to-date.

- **Deletion of your information** – you have the right to ask us to delete your personal information if:

- it is no longer necessary for the purposes for which we obtained it;
- you withdraw your consent, and we have no other legal basis for the processing.
- you validly object to the processing as described below;
- we have unlawfully processed the data; or
- we must delete the data to comply with a legal obligation.

- **Objecting to how we may process your information** – if we process your personal information to perform tasks carried out in the public interest or on legitimate interest grounds, you can object to this processing on the basis of your particular situation. We will only then continue the processing if we have overriding legitimate interest grounds for this, or the processing is to establish, exercise or defend legal claims. You may also object if we process your personal information for direct marketing purposes.

- **Restricting how we may process your information** – you have the right to ask us to restrict our processing of your personal information if:

- you contest the accuracy of the information (for a period of time that enables us to check it);
- there is no longer a legal basis for us to process your information, but you don't want the data deleted;
- we no longer need the data, but you require it to establish, exercise or defend legal claims; or
- you have objected (as above) and are awaiting confirmation as to whether we have overriding legitimate grounds for processing.

- **Transfer** – if our processing is based on your consent or necessary to carry out our contract with you, and is carried out by automated means, you have the right to request a copy of the personal information you have provided to us and the transfer of this to someone else. Where technically feasible, you can ask us to transfer it directly.

- **Withdrawing consent for processing your information** – you may withdraw your consent for the processing of your personal information at any time in which case we will stop processing your personal information for the purpose(s) for which consent was given unless we have another legal basis for the processing.

Please note that we may ask individuals to provide us with the information necessary to confirm their identity before responding. We will aim to acknowledge enquiries within 72 hours and respond within one month unless otherwise required by law. Complying with your request may be subject to a fee to meet our associated costs, where deemed appropriate.

We will consider all individual requests. However, we may not fulfil requests under circumstances where exemptions exist, which include a need to keep processing information to comply with a legal obligation. If such an exception applies, we will notify individuals when responding to their request.

### **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 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 in respect of your personal information, you can contact us by sending an email to [privacy.nigeria@shelfdrilling.com](mailto: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 (HR)**

This privacy statement will be subject to regular internal review, communicated periodically and any updates will be placed on the intranet page.

Paper copies of this global privacy statement may also be obtained by sending a request to [privacy.nigeria@shelfdrilling.com](mailto: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.