

Nigeria Privacy Statement (Recruitment)

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 applies to individuals applying, or registering their interest, to work with us, including prospective employees and contractors.

In this privacy statement, ‘personal information’ means your personal data – i.e., information about you from which you can be identified or are identifiable. This privacy statement explains how and why we will collect and use your personal information in the context of the recruitment process and gives examples of the rights you may have in relation to your personal information depending on the location in which you are based.

We may collect information about you from any/all of the following sources:

- directly from you
- recruitment agencies
- background check providers
- credit reference agencies
- former employers or other referees
- medical professionals

We may collect, use and store different types of personal information about you, including your:

- personal contact details (including name, age, date of birth, address, email, telephone number)
- your application form, cv, any covering letter or email, and interview notes
- references and details of previous employers
- professional memberships, registrations and qualifications
- copy of your driving license
- correspondence and results regarding any background checks
- results of any credit check
- offer letter, and proposed contract between you and us
- documentation confirming your right to work in the country to which the job vacancy relates

We may also collect, use and store other information which we may deem required to exercise an employment relationship (if applicable).

Certain personal information will be required to be provided by you during the recruitment process. If you don't provide this data, we may not be able to proceed with the recruitment process.

We do not currently take decisions about individuals based solely on automated processing (i.e., without human involvement) which have a legal or similarly significant effect on them.

Special Categories Of Personal Information

We may process the following special categories of personal information about you during the course of the recruitment process:

- information about a disability, the effects of that disability, and special arrangements that may need to be made to the recruitment process as a result of that disability
- health data and sickness records
- information regarding pregnancy and maternity
- marriage or civil partnership status
- information on gender reassignment
- data revealing race, religious beliefs, or sexual orientation

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

How We Use Your Personal Information

We will collect and use your personal information to, as applicable:

- contact you regarding the recruitment process and any offer of work
- make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work
- take up references (from referees whom you have put forward to support your application)
- carry out background checks
- carry out credit checks
- confirm your professional memberships, registrations and / or qualifications
- determine the terms of any potential contract between you and us
- if you have accepted an offer of work, check you are legally entitled to work in the country to which the job vacancy relates

- establish whether you can undergo an assessment which forms part of the application process
- consider reasonable adjustments to the recruitment process for disabled applicants
- assess your fitness to work via a health questionnaire or medical report including, in respect of individuals who have applied for a role which involves working offshore, by way of a pre-employment medical examination
- carry out equal opportunities monitoring

The Legal Basis For Processing Your Personal Information

We process your personal information on one or more of the following legal grounds:

- **consent** – in cases where this is appropriate, where you have explicitly agreed to us processing your information for a specific reason
- **contractual performance** – the processing is necessary to enter into a contract of employment with you or otherwise engage you as a worker of contractor with us
- **legal requirements** – the processing is necessary for compliance with a legal obligation to which we are subject or providing information to a public body or law enforcement agency where this does not contravene applicable data protection laws or regulations.
- **where we process special categories of personal information** – we rely on the following legal grounds for processing special categories of personal information. These are:
 - explicit consent, in cases where this is appropriate
 - to exercise or perform employment law rights or obligations
 - to review equality of opportunity or treatment
 - for the assessment of your working capacity

Sharing Your Personal Information

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

- individuals within the Shelf Drilling group of companies who may be based anywhere in the world
- other entities in the Shelf Drilling group of companies which may be based anywhere in the world
- health professionals and occupational health providers involved in your care
- if you are applying for a role which will involve you working offshore, to our providers of pre-employment medical examinations
- our regulators

- our professional advisors, and
- other third parties where necessary to comply with legal obligations upon us.

International Data Transfers And Accessing Of Your Data

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.

Job Applicants

If you apply for a vacancy but don't start work with us following the recruitment process, we will retain your personal information for such period as is necessary to allow us to establish, exercise or defend legal claims.

If your application is unsuccessful, we would like to retain your personal information so that we are able to contact you to discuss other work opportunities we have in the future for which we consider you may be suitable (i.e., other than the position you applied for). We need your consent in order to be able to retain your personal information for this purpose. **For that reason, prior to you being able to apply for one of our vacancies, you will be asked to read this privacy statement and to indicate whether you agree to its terms. If you tick the box to indicate that you agree to its terms, this will amount to you consenting to us retaining your personal information for this purpose for a period of two years. However, your consent can be withdrawn at any time by sending an email to privacy.nigeria@shelfdrilling.com.**

Registration Of Interest On Speculative Basis

If you register your interest in working with us on a speculative basis, we will retain your personal information for a fixed period for that purpose. We will need your consent in order to be able to retain your personal information for this purpose. **For that reason, prior to you being able to register your interest in working with us you will be asked to read this privacy statement and to indicate whether you agree to its terms. If you tick the box to indicate that you agree to its terms, this will amount to you consenting to us retaining your personal information for this purpose for a period of two years. Your consent can be withdrawn at any time by sending an email to privacy.nigeria@shelfdrilling.com.**

If you ultimately start work with us, we will give you a copy of our Nigeria Privacy Statement (HR) and will retain your personal information in accordance with those notices.

Your Rights

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 it was obtained
- 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 can 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 to another controller.

Withdrawing consent for processing your information – you have the right to 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.

You may contact us in any of the ways set out in the *Contact information, further advice, and complaints* section below if you wish to exercise any of your rights.

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.

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

Changes To Our Privacy Statement

This privacy statement will be subject to regular internal review and any updates will be placed on <https://www.shelfdrilling.com/careers/why-work-for-us/>.

Paper copies of this 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 RC1105524 respectively) having its registered office at 25 Abike Suleiman Street Lekki Phase 1, Lagos Nigeria.