

Thailand Privacy Statement

WHO WE ARE

This is the privacy statement of **Shelf Drilling (Southeast Asia) Limited** (“**Shelf Drilling**” or “**we**” or “**us**”). In this privacy statement references to our website refers to <https://www.shelfdrilling.com/>.

Should you require further information about the personal information we hold or the way in which your personal information is being collected or used, please contact us at the following contact information:

Entity	Contact information
Shelf Drilling (Southeast Asia) Limited	Rasa Tower II, Floor 18, Unit 1803-1804-2, 555 Phaholyothin Road, Chatuchak Sub-District, Chatuchak District, Bangkok 10900, Thailand

In this privacy notice we provide an overview of practices of Shelf Drilling with respect to the collection, holding, use and disclosure (collectively, **processing**) of personal information collected about you:

- when we provide information or services to you or our customers/vendors;
- if you are one of our investors or sign up to receive investor information from us;
- if you are vendor, supplier, or contact person or representative of vendor or supplier;
- governmental officials; and/or
- you use Shelf Drilling website

Note that this notice does not cover the processing of personal data of Shelf Drilling employees or individuals who are seeking employment with us. We have separate privacy notices for employees and job applicants – for a copy of these please contact us at privacy@shelfdrilling.com

Local Privacy Notices

This notice sets out the general data processing practices of Shelf Drilling in Thailand. 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 or are identifiable. We may collect, use, and disclose different types of personal information about you, which we have grouped together as follows:

- **Identity Data** includes name, gender, age, date of birth, nationality, passport number, and national identification number.
- **Contact Data** includes contact information, such as address, email address, and mobile phone number.

- **Financial Data** includes bank account.
- **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.
- **Sensitive Data** includes religious (e.g., when you provide us with identification card). In most cases, your Sensitive Data may not be required — we may request you to redact such Sensitive Data so that we will not collect unnecessary Sensitive Data.

Your 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.

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@shelfdrilling.com.

Purpose/Activity	Type of data	Legal basis
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 (b) Notifying you about changes to our terms or privacy policy	<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 customers use our products/services)
To verify identity	<ul style="list-style-type: none"> • Identity • Sensitive Data 	(a) Necessary for our legitimate interests (for Shelf Drilling to verify your identity) (b) Explicit consent (specifically for Sensitive Data)
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 	(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) (b) Necessary to comply with a legal obligation
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
To contact in relation to business transaction or business-related matter with the vendors and customers including, but not limited to, setting up vendors and customers accounts, payment processes.	<ul style="list-style-type: none"> • Identity • Contact • Financial 	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

To contact in relation to business operation for government/official matters	<ul style="list-style-type: none"> • Identity • Contact 	Necessary for our legitimate interests (to contact the official as a contact person when coordinating with government agency)
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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 or we will not be able to proceed with the above purposes.

International Data Transfers

We may transfer your personal information with our affiliates and/or to 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 Thai 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.
- **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 inadequate level of protection for your personal information.

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@shelfdrilling.com.

Your Rights

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

- 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 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 if the data breach may substantially affect your right and freedom;
- 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.

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.

Contact Information, Further Advice And Complaints

If you have any questions about this privacy statement, 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@shelfdrilling.com or our contact information provided above.

Changes To This Privacy Statement

We keep this privacy statement under regular review and will place any updates on our website. Paper copies of the privacy statement can be obtained by using the printer icon or by e-mailing us at privacy@shelfdrilling.com with your address.

This privacy statement was last updated on 26 October 2023.