

Thailand Privacy Statement (HR)

WHO WE ARE

This is the privacy statement (HR) of **Shelf Drilling (Southeast Asia) Limited** (“Shelf Drilling” or “we” or “us”).

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 using 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

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
- National identification card number
- Passport details
- Household registration
- Home address
- Personal contact details, including phone number, e-mail address.
- Nationality

- Marital status and dependents, including marriage / divorce certificate
- Spouse and/or minor child's national identification card details (including name, national identification card number, date of birth, address), birth certificate, phone number
- Next of kin and emergency contact information
- Job title / role / position
- Offer letter and contract of employment / contract for services
- Documentation confirming your right to work
- Start date
- Work location or place of employment
- Professional memberships and qualifications, professional certificates, employment certificate, training history and training certification
- approvals or licenses where applicable
- Educational background
- Work experience
- Bank account details
- Payroll information and wage records, tax status information, compensation history, expense details, salary and benefits details, other fringe benefits (if any), tax deduction details
- Tax, group health and life insurance details, social security number
- Absence records
- Hours worked, overtime, shift records, swipe card records
- Leave records
- Training records
- Travel booking details, including passport numbers, expiration dates and copies, 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
- Information about your health including any medical condition and sickness records, laboratory and specific examination, chief complaint, treatment, immunization, mental health, drugs, and alcohol
- Biometric data (fingerprint) for the purpose of uniquely identifying you
- Information about criminal convictions and offences, including criminal records check
- Spouse and/or minor child's medical certification

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 for the following purposes including, but not limited 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, including registration with Social Security Office regarding Social Security Fund, Workmen Compensation Fund and Provident Fund
- comply with applicable laws, regulations, and other governmental requirements
- 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, including complete an investigation report in case any illness and injury occurs on the rig and mobilize to hospital
- provide and process payments and benefits including, disbursement, deducting tax and other contributions as required by law or elected by you
- maintain records of working time, Leave, 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 training and development in respect of employees
- conduct grievance proceedings in respect of employees
- 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
- provide access to our premises
- apply for visa, permit when requiring for any company business purpose
- prepare our finance reports
- 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:

- Explicit consent, in cases where this is appropriate
- To exercise or perform employment law rights or obligations as stipulated in the applicable law
- For health or social security as stipulated in the applicable law
- To establish, exercise or defend legal claims
- To protect the vital interests of a person in either case if that person is incapable of giving consent

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
- our customers
- other entities in the Shelf Drilling group of companies
- our service providers, including visa agents, payroll and retirement savings plan and pension administrators, logistic partners, 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, including but not limited to Thai government, Ministry of Labor, Social Security Office, and Department of

Skill Development, where appropriate

International Data Transfers

We process personal information in countries around the world where we have operations. We may transfer your personal information to countries outside Thailand, including intra-group transfer, to operate our business and/or to comply with legal obligations. Some of these countries outside Thailand in which we operate are not deemed to provide an adequate level of protection for your personal information. However, in such cases, we will take appropriate measures to safeguard your personal information in a way that complies with relevant data protection laws.

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.

Your Rights In Respect Of Your Personal Information

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

- **Access to your information** – you can request a copy of the personal information about you that we hold.
- **Correcting your information** – you can ask us to correct your personal information if you believe it is not accurate, complete or up-to-date.
- **Deletion of your information** – you can 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, scientific, historical, or statistical studies purposes.

- **Restricting how we may process your information** – you can 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, 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.
- **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, 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.

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@shelfdrilling.com or our contact information provided above.

Under Thai privacy laws you may have a right to complain to the Personal Data Protection Committee in the event that Shelf Drilling violates or fails to comply with the Personal Data Protection Act, B.E. 2562 (2019) or and its subordinate laws.

Changes To Our Privacy Statement (HR)

This privacy statement will be subject to regular internal review and any updates will be placed on [Shelf Drilling Legal Intranet](#).

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

This privacy statement was last updated on 26 October 2023.