



## CORPORATE DATA PRIVACY AND PROTECTION POLICY

Version 2

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It is the policy of the company to respect confidential and proprietary information received or gathered from others. Personal data shall only be obtained on a company need-to-know basis and shall be strictly handled in a legal and secure way for the protection of the individuals. Inadvertent disclosure must be reported immediately so that precautionary action can be taken.

The Company, its subsidiaries and associated companies (furthermore called the group) may, collect, store, possess, disclose, access, review and use personal data about employees, customers, suppliers and other third party, for appropriate purposes as

- Safety and Security
- Business negotiation and acquisition
- Customer and third-party relation management
- Contract fulfilment (providing service to customer, paying suppliers and other third-party)
- Authorisation evidence and confirmation (banks, contract signing)
- Compliance with International and national law & regulations
- P&I insurance case management
- Marketing and creating better experience on our webpages
- Recruitment
- HR administration, HR reporting and insurance administration
- Compensation, benefits administration and benchmarking
- Budgeting, bonus payment and salary adjustment process
- Performance appraisal and job evaluation
- Disciplinary action and grievance management
- Talent management including training and development
- Corporate policy signing
- Pensioners relation management

The company is committed to

- Protecting the privacy rights of our employees and everyone with whom we do business
- Process personal data in accordance with applicable data protection regulation
- Take reasonable steps to make sure that personal data it collects is accurate, complete and up to date
- Take reasonable steps to protect the personal data it holds
- Respect the person's right to access, rectify, erase, restrict processing or transmit its personal data
- Erase or anonymize personal data when it is no longer needed for the purpose for which it was collected and processed

The company may transfer personal data collected on an aggregated or individual level to various divisions, subsidiaries, joint ventures and affiliated companies of the group around the world located inside or outside the European Economic Area for the purposes stated above. Personal data will not be disclosed to anyone third party outside the group without the person's consent unless permitted or required under applicable legislation and/or necessary for the performance of a contract e.g. employment contract.

If you have any queries or requests or wish to make any applications concerning your personal information or data, please contact Odfjell's Human Resource Department.