

This Privacy Notice sets out the basis on which the Company will process any personal data the Company collects or receives from its business customers and suppliers. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

**Data Protection Officer:** The GDPR Steering Committee will assume the responsibilities of the Data Protection Officer. All correspondence should be addressed to [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com)

**Scope:** This Privacy Notice applies to Sparrows Offshore Group Limited (“Sparrows Group”), (“The Company”) and all subsidiary companies.

## 1 WHAT INFORMATION DOES THE COMPANY COLLECT?

The Company collects and processes a range of information about you which includes:

- Your name, address and employee contact details, including job title, email address and telephone number
- Personal information on directors, officers and shareholders for screening purposes to ensure Sparrows Group comply with legal and regulatory obligations, including trade control, anti-money laundering, anti-bribery and corruption laws and other regulatory requirements.

Data is stored in a range of different places, including the Company’s Customer Relationship Management System, contracts database and email system.

## 2 WHY DOES THE COMPANY PROCESS PERSONAL DATA?

The Company needs to process data for the following purposes:

- For the purpose of undertaking Business Development
- Concluding, performing and managing new and existing contracts
- Health and safety
- Legal and/or regulatory compliance

## 3 WHO HAS ACCESS TO DATA?

Your information will be shared internally with Sparrows Staff, if access to the data is necessary for performance of their roles and, where necessary, competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which Sparrows Group is subject to. In all circumstances the data will be subject to confidentiality arrangements.

## 4 HOW DOES THE COMPANY PROTECT DATA?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Data may be transferred outside of the European Economic Area to companies within the Sparrows Group under our Binding Corporate Rules which guarantee an adequate level of data protection wherever your data is physically kept.

Where the Company engages third parties to process data on its behalf, it does so on the basis of written instructions, ensuring the third party is under a duty of confidentiality and obliges the third party to implement appropriate technical and organisational measures to ensure the security of data.

## 5 FOR HOW LONG DOES THE COMPANY KEEP DATA?

The Company will hold data for the duration of our contractual relationship with you and for a period of 7 years thereafter as set out in a retention policy.

In cases where data is held for a longer period of time where there is a legal or regulatory reason to do so, data will be deleted when it is no longer required for the legal or regulatory purpose it was held for.

## 6 YOUR RIGHTS

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require The Company to change incorrect or incomplete data;
- Require The Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where The Company is relying on its legitimate interests as the legal ground for processing; and
- Ask The Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override The Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Protection Officer. All correspondence should be addressed to [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com)

If you believe that The Company has not complied with your data protection rights, you can complain to the Information Commissioner.

## 7 CHANGES TO PRIVACY NOTICE

We keep our Privacy Notice under regular review and, as such, it may change from time to time. This Privacy Notice was last updated on 23<sup>rd</sup> May 2018.