



Privacy Statement

The Frigstad Group includes Frigstad Offshore (and Subsidiaries), an offshore drilling contractor managing operations, construction, and upgrades of drilling units, and Frigstad Engineering (and Subsidiaries), a provider of high end semi-submersible rig designs and offshore engineering services. We therefore require processing personal data (some of which may be sensitive personal data), so that we can provide the above services – in doing so; we act as a data controller. Frigstad Group is committed to ensuring the secure and safe management of data held by us in relation to customers, staff and other individuals. Our staff members have a responsibility to ensure compliance with the terms of this statement.

The entities covered by this statement include, however not limited to:

- Frigstad Offshore Limited
- Frigstad Offshore AS
- Frigstad Engineering Limited
- Frigstad Engineering (Norway) AS

We must have a legal basis for processing your personal data. There are several ways in which you can give us your personal details; for example you may give them to us directly via our website, through job applications or emails containing your resume, or we may collect via social media in relation to professional connections.

Legislation

It is a legal requirement that we process data correctly; we must collect, handle and store personal information in accordance with the relevant legislation.

The relevant legislation in relation to the processing of data are:

- 1) The General Data Protection Regulation (EU) 2016/679 (the GDPR);
- 2) The Privacy and Electronic Communications (ED Directive) Regulations 2003

Legal basis for processing our data

Legitimate Interests

We believe that we have a legitimate interest in processing your data for the purposes of providing work seeking services to both our customers and candidates.

Frigstad Group believe it is a reasonable assumption to expect that if you are looking for employment within the Frigstad Group or have posted your cv within our website, you are happy for us to collect and use your data to offer or provide you with work seeking opportunities. This can potentially include forwarding your details to Oil Companies or other relevant interested parties, for tender or employment purposes, or demonstrating our expertise within the offshore or engineering industries.

In order to comply with various legal, regulatory and tax obligations, we may share your data with the appropriate authorities to meet these obligations.

To ensure we provide our services efficiently to you, we will need data for internal processes such as payroll or invoicing.

Consent



While processing sensitive data, we will need to obtain your consent. In these cases:

- You should be able to control your consent
- We will keep a record of your consent
- You have to give your consent freely
- You need to understand fully what you are consenting to
- You have the right to withdraw your consent.

Collection of personal data

In order for us to process your employment applications, we may collect some or all of the following types of personal data. The following list is not exhaustive and is in addition to any data that we are required by law to process:

- Name
- Gender
- Date of birth
- Education
- Employment history
- Contact details
- Nationality
- Copy of ID/passport
- Tax information such as social security numbers
- Details of criminal convictions where applicable to the job application
- Current salary and package

How we collect your personal data

- 1) Personal data that you give us; This will help us identify the most appropriated roles for you. This may be from you registering on our website or sending us a copy of your CV electronically or by post.
- 2) Personal data that we receive from third parties for example Agencies; This may include shared information from our clients or from your referees. It could also come from social media.

How we use your personal data

Candidates

- 1) Employment opportunities within the Frigstad Group; we may submit your data to Oil Companies or other relevant interested parties in relation to employment. Store your data within our database for future usage. Facilitating payroll & invoicing processes. Verify details that you have provided. Necessity to comply with our legal obligations.
- 2) To help establish, exercise or defend a legal claim.

Who we share your personal data with

We share your data with a variety of other parties during the course of conducting our business, in a number of ways, for a number of reasons.

They are as follows:

- 1) Our group companies



- 2) Third party IT companies with whom we are contracted to and have appropriate data processing agreements
- 3) Third party service providers who perform work on our behalf (e.g. lawyers, auditors etc.)
- 4) Tax and local authorities to enable us to comply with laws and regulations

Data storage and security

All personal data held by us must be stored securely, whether electronically or in paper format.

Paper storage

If personal data is on paper it should be stored in a secure place where unauthorised personnel cannot access it. Authorised Frigstad Group employees should make sure that no personal data is left where unauthorised personnel can access it. When the personal data is no longer required it must be disposed of to ensure its destruction. If the personal data requires to be retained on a physical file then the authorised Frigstad Group employee should ensure that it is properly secured within the file. All files must be held (as a minimum) in locked secured filing cabinets.

Electronic Storage

Personal data stored electronically must also be protected from unauthorised use and access. Personal data should be password protected when stored.

How we safe guard your personal data

We take all reasonable steps to ensure that your data is safe and protected from misuse, loss or unauthorised access. We ensure this by implementing a range of technical safeguards and operational processes. We also have processes to deal with any suspected data breach.

If you suspect that your data has been misused, or has been compromised, please contact us at DPO@frigstad.com

Breaches

A data breach can occur at any point when handling personal data and we have reporting procedures in the event of a data breach or potential breach occurring. Breaches which pose a risk to the rights and freedoms of the data subjects who are subject of the breach require to be reported externally to the relevant local authorities for example Information Commissioners Office (ICO) in UK. The Company Directors are required to monitor compliance and report any breaches which pose a risk to the rights and freedoms of the data subjects who are the subject of the breach to the relevant local authorities in accordance with local GDPR requirements.

Retention Policy

We will not retain your data longer than we need it. In certain cases we are required to hold your data to comply with tax, legal or regulatory issues, for instance payroll. Subject to this we will delete your data if we haven't had any contact from you for a three year period.



Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about personal data that we process on you;
- The right of access to the personal data that we process on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling: and
- The right to withdraw consent at any time.

Where you have consented to us processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting our Data Protection Officer at DPO@frigstad.com