



EXOLUM SHANNON LIMITED
IRELAND PRIVACY NOTICE FOR BUSINESS TO BUSINESS PURPOSES

Exolum Shannon is committed to protecting and respecting your privacy and complying with Data Protection Legislation. This privacy notice explains how Exolum Shannon uses any personal data which we collect about you directly from you and/or through your use of our website and/or through our business dealings with or in relation to you.

This notice applies to all persons about whom we hold personal data except those persons being job applicants, current or former employees, workers and agency workers and any persons in relation to our use of CCTV. The persons to whom this privacy notice is most likely to be relevant include past and present employees, workers or agency workers of our current and former customers and suppliers, persons who have accessed our website, and those whose contact details have been collected by us for marketing purposes or for the purposes of future communication.

Within this privacy notice 'Exolum Shannon' shall refer to Exolum Shannon Limited and 'we' 'us' and 'our' shall be interpreted accordingly. Exolum Shannon Limited will have the role of data controller. If you have any queries about this privacy notice you should contact us by email at dataprotection@exolum.com.

Reference to 'Data Protection Legislation' means the Data Protection Acts 1988-2018 and the General Data Protection Regulation (GDPR) (EU) 2016/679.

What personal data do we collect about you?

We may collect personal data about you such as name, address, telephone number, email address, name of employer or company with whom you work and the role you perform (including previous employers and/or companies), business sector, information included on business cards, information included on invoices, records of attendance at our offices, terminals or events (including vehicle registration details), and any other information provided by you, or any third party, in connection with our business.

We may also collect information about your use of our website (for example those pages of our website which you have viewed and your IP address). It is unlikely that you will be identified from this information, although in rare cases this may be possible.

What will your personal data be used for and why?

The purposes for which we use your personal data will depend on the nature of the relationship between us, but are likely to fall within at least one of the following four categories:

- **Business administration** – We may use your personal data for general business administration, such as to enable us to provide services to our customers, facilitate our suppliers in providing services to us, management and planning, and in the administration of our website.
- **Marketing and event management** – We may use your personal data for marketing and event management, such as to inform you of our services (including by way of emails and press releases) and/or to invite you to business and industry events.
- **Safety and Security** – We may use your personal data for maintaining safety and security at our sites and of our network and information technology systems. Recording attendance at our offices and terminals, including vehicle registration details, helps us to maintain safety and security at our sites which assists us in



the prevention of safety and or security related incidents. Records of attendance and vehicle registration details may be used in the investigation of safety and or security related incidents. Information collected through our website may be used to maintain safety and security at our sites and to maintain security of our network and information technology systems. Maintaining safety and security is critical to ensure: safety at our sites; protection of our property and that of any third party at or located in the vicinity of our sites; the protection of duty suspended product at sites authorised by HMRC to operate as tax warehouses.

- **Website statistics** – We may use data collected from the use of our website to compile statistics about the users and use of our website.

We consider there to be two potential legal grounds for processing your personal data. The first is that the processing is necessary for the purposes of our legitimate interests (or those of a third party, such as a customer or supplier), being the furtherance of our own business (and/or that of a relevant third party) and/or the safety and security of our sites and property and people located on those sites. The second is that the processing is necessary for protecting the vital interests of all individuals who access our sites by ensuring their safety and wellbeing at all times.

Who else might have access to or receive your personal data?

We may share your personal data with certain employees, workers, agency workers, agents and/or professional advisers and those of our wider group of companies, which at the date of this notice comprises Compañía Logística de Hidrocarburos, CLH S.A. and its subsidiaries, where considered appropriate for the purposes for which the data is being processed.

We may also share your personal data with other third party companies who provide services to us (for example marketing agencies and information technology service providers). Where there is a need in relation to safety and security at our sites, we may also share your personal data with any other relevant third parties in connection with your attendance at our sites, such as our customers (and their agents and contractors), our landlords and contractors and your employer. Additionally, we may also share your personal data with third parties in connection with a potential sale of some or all of our business or assets or a potential business restructuring or reorganisation. We may also share your personal data where we are under a legal obligation to do so.

Where we engage a third party to process your personal data on our behalf i.e. a data processor, we will ensure that that processing is governed by a legal contract which requires that the data processor acts confidentially and solely in accordance with our instructions. We will also seek a guarantee that such data processor has appropriate technical and organisational measures in place to maintain the security of your personal data.

How long will your personal data be stored for?

Whilst it is difficult for us to give you an exact period of time for which your personal data will be stored (as this will depend on the personal data itself and the purpose for which it is being processed) our intention is to retain such data only for as long as necessary to fulfil the purposes for which it was collected.

Notwithstanding the foregoing, all emails sent to and from any Exolum Shannon email addresses may be kept for long periods of time in accordance with archiving protocols adopted by Exolum Shannon from time to time. If personal data is included in emails then these will be retained in accordance with such archiving protocols.



What rights do you have in respect of your personal data?

Under Data Protection Legislation you have various rights in relation to your personal data. These include the right to: request from us access to your personal data; request from us the rectification or erasure of your personal data; request from us the restriction of processing or to object to the processing of your personal data; request from us a copy of all personal data we hold about you in a structured, commonly used, machine readable format and/or request that all such data is transferred to another data controller i.e. data portability.

You also have the right to lodge a complaint to the Data Protection Commissioner by emailing info@dataprotection.ie if you believe that we have not complied with the requirements of Data Protection Legislation with regard to your personal data. You can also submit an enquiry or complaint directly to us by emailing dataprotection@exolum.com.

Will your personal data be transferred outside the European Economic Area (“EEA”) to a ‘third country’?

It is possible that your personal data will be transferred outside the EEA to a third country during the course of or otherwise in relation to your employment. If your personal data is transferred outside of the EEA then we confirm that such a transfer will be made in compliance with the conditions of transfer as set out in Data Protection Legislation.