



EXOLUM SHANNON LIMITED
IRELAND PRIVACY NOTICE FOR CCTV RECORDING

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 from our use of CCTV. This notice shall apply to employees and all other persons that are present at our sites (including those sites at which we provide management and operations services), or who are in the vicinity of such sites, where CCTV is in operation.

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?

At sites where CCTV is in operation, personal data in relation to you may be processed in the form of personal images. Signage indicates those sites at which CCTV is in operation.

What will your personal data be used for and why?

CCTV is used to help us maintain and ensure safety and security at our sites.

- **Safety** – CCTV images will be used to help maintain safety at our sites. CCTV may be live monitored to assist in the prevention of safety related incidents and recordings may be used in the investigation of safety related incidents (including any near miss) in order to understand the cause of such incident and to put corrective action in place, or for audit purposes to ensure safety critical tasks are routinely completed.
- **Security** - CCTV images will be used to help maintain the security of our sites. CCTV may be live monitored to assist in the prevention of security related incidents and recordings may be used in the investigation of security related incidents. Maintaining 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 to operate as tax warehouses.

For the avoidance of doubt, we may review and use CCTV images when investigating safety and security related incidents under our Disciplinary and Dismissal Procedures for employees.

We consider there to be two potential legal grounds for processing your personal data by way of CCTV footage: firstly because the processing is necessary for the purposes of our legitimate interests, being the safety and security of our sites and property and people located on those sites; and secondly because 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.

Whilst we do not expect to routinely process any special categories of personal data as a result of CCTV recording, it is possible that special categories of personal data may be processed. Where this is the case, the legal basis for processing is likely to be: because it is necessary for the purposes of carrying out our obligations and in exercising our



rights in the field of employment law; because the individual has made the special categories of personal data manifestly public; or in order to establish, exercise or defend legal claims.

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 CCTV and information technology service providers). Where there is a need in relation to safety or security at our sites, we may also share your personal data with any other relevant third party in connection with your presence at (or in the vicinity of) our sites, such as our customers (and their agents and contractors), our contractors and your employer. We may also share your personal data where we are under a legal obligation to do so.

How long will your personal data be stored for?

CCTV recordings will normally only be retained for such period of time as to allow an incident to come to light and for an investigation into any incident to be concluded. Where no incident has come to light, our normal practice is not to keep CCTV footage for longer than one month after it was recorded.

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 CCTV images have been sent by email 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.