



EXOLUM TERMINALS LIMITED
UK PRIVACY NOTICE FOR CCTV RECORDING

Exolum Terminals is committed to protecting and respecting your privacy and complying with data protection legislation. This privacy notice explains how Exolum Terminals 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, or who are in the vicinity of our sites, where CCTV is in operation.

Within this privacy notice 'Exolum Terminals' shall refer to Exolum Terminals Limited and its UK subsidiaries (including Exolum Immingham Limited, Exolum Seal Sands Limited, Exolum Riverside Limited, Exolum Tyneside Limited, Exolum Storage Limited, Exolum Eastham Limited and Exolum Grangemouth Limited) and 'we' 'us' and 'our' shall be interpreted accordingly. The relevant Exolum Terminals group company which owns or operates the site at which the CCTV is in operation 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.

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 and also in relation to compliance with our legal obligations.

- **Safety** – CCTV images will be used to help maintain safety at our sites. CCTV may be live monitored to assist in the prevention, detection and management 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, detection and management 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 by HMRC to operate as tax warehouses.
- **Compliance with legal obligations** – CCTV recording helps us to comply with our legal obligations. All of our UK terminals are 'upper tier' sites for the purposes of the COMAH regulations. These regulations require us to demonstrate that we take all measures necessary to prevent major accidents at our sites and limit their consequences to persons and the environment. We consider the use of CCTV to be a critical measure in minimising safety and security risks which consequently minimizes the risks to the environment and local populations.

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 compliance with legal obligations to which we are subject.

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 or otherwise at the request of law enforcement agencies.

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 35 days after it was recorded.

Notwithstanding the foregoing, all emails sent to and from any Exolum Terminals' email addresses may be kept for long periods of time in accordance with archiving protocols adopted by Exolum Terminals from time to time (which in any event will be no longer than 20 years). 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 the 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 Information Commissioners' Office if you believe that we have not complied with the requirements of the 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 UK or the European Economic Area (“EEA”)?

It is possible that your personal data will be transferred outside the UK or the EEA. If your personal data is transferred outside of the UK or the EEA then such transfer will be made in compliance with the conditions of transfer set out in data protection legislation which may include one of the following safeguards:

- The country to which the personal data is being transferred has been deemed to provide an adequate level of protection for personal data;
- Contractual obligations have been put in place to ensure that your personal data is treated in a way that is consistent with and respects laws on data protection.