



PRIVACY POLICY

Last updated: August 2024

1. INTRODUCTION

Inch Cape Offshore Limited (the 'Company') takes your privacy seriously and is committed to protecting your personal data and to being transparent about what personal data we hold, and how and why we process your personal data.

This policy explains what personal data (information) we hold about you, how we collect it, how we use it and how we may share it when you use our website or communicate with us. We are also required to notify you of this information under the UK General Data Protection Regulation and Data Protection Act 2018 (the 'Data Protection Legislation').

Please ensure that you read this policy ('Privacy Policy') and any other similar notices we may provide to you from time to time when we collect or process personal data about you.

Where in this notice we refer to 'we' or 'our' or 'us' we are referring to the Company and where we refer to 'you' or 'your' we are referring to users of our website and where you interact with us.

2. WHO COLLECTS THE PERSONAL DATA

In relation to this website, we are your controller (the party that is responsible for compliance with the Data Protection Legislation). However, if your controller is another member of our affiliated entities and group companies, we will make that information clear to you at the time your personal data is collected.

3. DATA SUBJECT RIGHTS

The Data Protection Legislation gives you a number of specific rights, depending on the circumstances, namely:

- To be informed about how, why and on what basis your personal data is processed (this information is communicated in this Privacy Policy);
- To confirm that your personal data is being processed, and to access it along with certain other information, by making a Subject Access Request;
- To have your personal data corrected if it is inaccurate or incomplete;

- To object to the processing of your personal data by us where the processing is based on our legitimate interests (unless we can demonstrate, on balance, compelling legitimate grounds for continuing to process the personal data which override your rights), or which are for the establishment, exercise or defence of legal claims;
- To object to your personal data being processed for direct marketing purposes (including profiling). You may exercise your right to prevent such processing by checking certain boxes to opt out on the forms we use to collect your personal data. You can also exercise the right at any time by contacting us using the contact details below;
- To have personal data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing (this is sometimes known as ‘the right to be forgotten’);
- To obtain your personal data from us in a format that can be easily re-used or to ask us to pass on your personal data in this format to other organisations if this is technically feasible;
- To restrict the processing of personal data where the accuracy of the personal data is contested; where you would have the right to ask us to delete the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the personal data to establish, exercise or defend a legal claim;
- To not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you; and
- To withdraw your consent, where we are relying on it to process or share your personal data.

If you wish to exercise any of these individual rights, please contact our Data Compliance Manager, who can be contacted at datacompliance@inchcapewind.co.uk.

4. ABOUT THE PERSONAL DATA WE COLLECT AND HOLD

The type of personal data that we (or third parties on our behalf) may collect from you depends on how you use our website and what you supply via email or telephone, and may include:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address(es));
- Any information you choose to provide to us when filling out: (a) the contact form; or (b) the registration form on our supplier registration database (the ‘Supply Chain Database’) on our website;
- Details of any complaints you may have submitted to us;
- Your IP address and other technical information collected using cookies, which tells us how you use our website (e.g. the pages you click on);
- Your geographic location (country/territory where you are living and/or working); and
- Personal data collected during the recruitment process when you apply for a vacancy with us on our website, recruitment page, via email or using another channel such as LinkedIn (including CV, cover letter and professional (and other) qualifications).

5. HOW WE COLLECT THE PERSONAL DATA

In order to provide you with the services you have requested (including the Supply Chain Database), we (or third parties on our behalf) need to collect and use your personal data from a number of different sources, including personal data you give to us:

- When you use the contact form on our website;
- When you apply for a vacancy with us;
- When you complete our registration form on our Supply Chain Database;
- When you talk to us on the phone;
- When you contact us on social media;
- When you write to us via email or letter; or
- When you use our website.

6. WHY WE COLLECT THE PERSONAL DATA AND HOW WE USE IT

We will typically collect and use this personal data for the following purposes:

- To communicate with you;
- To tell you about events that may be of interest to you;
- To investigate any complaint that you make;
- To enhance the security of our network and information systems;
- To analyse how our website is being used;
- To update and maintain the Supply Chain Database (for more information on how we use information on the Supply Chain Database, see section 8 (Supply Chain Database) below);
- To host, maintain and otherwise support the operation of our website;
- To comply with our legal and regulatory obligations; and
- To establish, exercise or defend our legal rights, including where we reasonably consider it is in our (or others) legitimate interests.

There are four main ways that we are permitted to use your personal data:

- To fulfil our contractual commitments to you;
- To meet our legal obligations;
- When you consent to us using your personal data; or
- When it is in our legitimate interests.

We determine the possibility of relying on our legitimate interests by conducting a balancing test to ensure that these interests do not outweigh your privacy rights. This involves processing your personal data only to the extent necessary for the intended purpose and in ways you would reasonably expect based on the information provided in this Privacy Policy.

7. HOW WE MAY SHARE THE PERSONAL DATA

With the exception of company information and personal data that you provide us to register on our Supply Chain Database (see section 8 below), we will not transfer your personal data to, or allow access to your personal data by, third parties, unless: (a) we are legally obliged to do so; or (b) the data transfer is necessary for the execution of a contractual relationship with you; or (c) you have previously consented to the disclosure of your personal data. For more information on how we use your personal data on our Supply Chain Database, please see section 8 (Supply Chain Database) below.

The purposes for which we share your personal data may include:

- Sharing your personal data within the Company for recruitment purposes where you have applied for a vacancy with us and that vacancy has already been filled, or where we believe that your skill set would be better suited to a different role;
- If you have expressed an interest in being one of our suppliers;
- Providing, reviewing and/or receiving services in relation to our website (such as suppliers of technical, support and installation services, security providers and cloud services providers); and
- As required by the law.

Through our contractual arrangements, we require all third parties to respect the security of your personal data and to treat it in accordance with the law.

Our website uses Google Analytics, which works using cookies. We use the information collected by Google Analytics cookies to find out about how visitors use our website. You can opt-out of Google Analytics by downloading and installing the browser plug-in available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>

8. SUPPLY CHAIN DATABASE

We maintain and publish the Supply Chain Database on our website. The database is a list of suppliers interested in working with us or with our key contractors. To be listed on the database, suppliers are required to submit a registration form, which contains certain information about the supplier and personal data about the supplier's contacts, including:

- company name;
- company address;
- company website address;
- company's field of expertise and the types of services/products supplied; and
- name, email address and phone number of the relevant contact person(s).

Once published on the Supply Chain Database, this information is publicly available and may be viewed by any of our website users. Our procurement team refer to the database when shortlisting for tenders and may share the information provided in the registration form with our key contractors. We may also use the information to contact the contact person(s) of registered suppliers with information about upcoming events and relevant project updates.

The information and personal data listed above will remain published on the Supply Chain Database unless and until you: (a) notify us that you wish to make a change to or update your company's information or your personal data; or (b) ask us to delete your company's information or your personal data from the Supply Chain Database.

9. WHERE PERSONAL DATA MAY BE HELD

Your personal data may be held by us and those of our affiliated entities and group companies or third-party service providers as described above. Your personal data may also be transferred internationally to China and to other countries around the world, including countries that do not have data protection laws equivalent to those

in the UK. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

We have agreements with our affiliated entities, group companies and third-party service providers (as applicable) to ensure that they will not use your personal data for any other purposes other than those we have agreed with them.

We explicitly require that any third-party service providers that use your personal data on our behalf implement adequate safeguards to protect your personal data, in accordance with the Data Protection Legislation and any other applicable local data protection laws. For example, we may put contracts in place (which are approved by the UK Information Commissioner's Office and are known as 'standard contractual clauses') with those service providers, or alternatively will ensure they have signed up to, and comply with, any other approved mechanisms that may become available to us in the future. We will also carry out an appropriate risk assessment of the laws and practices of the destination country to identify any technical and organisational measures that need to be put in place to ensure that your personal data is fully protected when in that country.

10. HOW LONG WE KEEP YOUR PERSONAL DATA

We keep your personal data for no longer than is necessary for the purposes for which the personal data was originally collected. The length of time we retain it for depends on the purposes for which we use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

Whilst we continue to process your personal data, we will ensure that it is treated in accordance with this Privacy Policy. Otherwise, we securely erase your personal data once this is no longer needed.

We store the information collected by Google Analytics for 12 months.

11. KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected personal data security breach. We will notify you and any applicable regulator of a suspected personal data security breach where we are legally required to do so.

12. HOW TO CONTACT US

If you would like to contact us in relation to your rights (see section 3 above) or if you are unhappy with how we've handled your personal data, please contact us [here: datacompliance@inchcapewind.co.uk](mailto:datacompliance@inchcapewind.co.uk)

If you're not satisfied with our response to any complaint or believe our processing of your personal data does not comply with Data Protection Legislation, you can make a complaint to the Information Commissioner at ico.org.uk/make-a-complaint or telephone: 0303 123 1113.

13. CONFIDENTIALITY

We acknowledge that the information you provide may be confidential. We do not sell, rent, distribute or otherwise make personal data commercially available to any third party except as set out in this Privacy Policy or in connection with a merger or acquisition. We will maintain the confidentiality of and protect your personal data in accordance with our Privacy Policy and the Data Protection Legislation.

14. CHANGES TO THIS PRIVACY POLICY

We may make minor changes to our Privacy Policy. When we make these changes, we will publish the updated Private Policy on our website.
