



## **Third Party Data Protection Standard**

---

General information on Seabed Geosolutions'  
Data Protection Practices

July 2018

Revision: 1

## Table of Contents

<b>WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?</b> .....	3
<b>DEFINITIONS</b> .....	3
<b>PERSONAL DATA WE COLLECT ABOUT YOU</b> .....	3
<b>HOW AND WHY WE USE YOUR PERSONAL DATA</b> .....	5
<b>YOUR RIGHTS</b> .....	6
<b>SECURITY OF YOUR PERSONAL DATA</b> .....	6
<b>FOR HOW LONG WE PROCESS YOUR PERSONAL DATA</b> .....	6
<b>COOKIES AND OTHER TRACKING TECHNOLOGIES</b> .....	7
<b>SHARING YOUR PERSONAL DATA</b> .....	7
<b>TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EU/EEA</b> .....	7
<b>CONTACT INFORMATION</b> .....	8

## WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Our Third Party Data Protection Standard (the “**Standard**”) applies to the Personal Data that Seabed Geosolutions collects and uses. References in this Standard to “SBGS”, “we”, “us” “the Company” or “our” mean Seabed Geosolutions BV (registered in the Netherlands with its registered office at Dillenburgsingel 69, 2263 HW Leidschendam, The Netherlands) and each of its subsidiaries.

SBGS controls how your Personal Data is collected and the purposes for which we process your Personal Data. SBGS is the Data Controller.

## DEFINITIONS

1. **Data Controller:** the person or organization that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with legal requirements. We are the Data Controller of all Personal Data relating to our Company and Personal Data used in our business for our own commercial purposes.
2. **Personal Data:** any information identifying a data subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person’s actions or behavior.
3. **Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.
4. **Sensitive Personal Data:** information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

## PERSONAL DATA WE COLLECT ABOUT YOU

We collect some Personal Data from you, for example when you use our services or simply contact us. We may also receive your Personal Data from our vendors who provide services to you on our behalf (for example when you provide feedback on our services).

# Third Party Data Protection Standard



## 1. Categories of data we collect

We may collect and process the following categories of information about you:

Categories of Personal Data Processed	When do we Process your Personal Data?	What legal basis do we rely on for Processing your Personal Data?
Your name and surname and contact details (email address, job title, telephone number and postal address)	<ul style="list-style-type: none"> <li>• When you interact with one of our staff</li> <li>• When you use our services</li> </ul>	<ul style="list-style-type: none"> <li>• We base the Processing on our legitimate interest in running our daily business and being able to provide you with our services.</li> <li>• When you order our services, our Processing is based on us being able to fulfill the services agreement.</li> </ul>
Your public C.V. profile.	<ul style="list-style-type: none"> <li>• When you apply for a position at SBGS</li> <li>• When hired to perform a service for SBGS</li> </ul>	<ul style="list-style-type: none"> <li>• We based the Processing on our legitimate interest in running our daily business with qualified personnel.</li> <li>• We base the Processing on our legitimate interest in being able to inform our customers/clients of your credential relevant to the services.</li> </ul>
Information about your transactions, including your payment/bank account details.	When you provide services to SBGS	We based our Processing on us being able to fulfill the service agreement with you.
Your communications with us (for example, your emails, letters, telephone calls or messages).	When you contact SBGS or you are contacted by SBGS	We base the Processing on our legitimate interest in running our daily business and being able to provide you with our services.
Passport, visa and security information	When you board an SBGS owned or chartered vessel	We base the Processing on compliance with a legal obligation where we are required to obtain this information by law.
Pictures or videos taken at SBGS events or other third party events which may include you.	When you participate in a SBGS event or a third party event of which SBGS is a part.	We based the Processing on consent, which we will ask you to provide, if relevant. In certain circumstances, we may base the

		Processing on our legitimate interest, if the pictures or videos are of a situational character and does not specifically depict you.
Your feedback	When you reply to our requests for feedback or participate in customer/client surveys	We base the Processing on our legitimate interest in running our daily business and being able to provide you with our services.

## 2. Sensitive Personal Data

In the course of providing services to you, we do not expect to collect Sensitive Personal Data, unless you have provided us with information on your need for special assistance and such information reveals health information about you. In such case, we will seek your consent before we process any such information electronically.

## HOW AND WHY WE USE YOUR PERSONAL DATA

We use your personal data for the following purposes:

- **To provide services to you**  
When you request our services or when we hire you to perform any services, we use your information to perform our services in relation to you or those products. For example, to answer an enquiry, to issue an invoice, or to determine whether a contract was executed.
- **To inform you about our news and offers that you may like**  
If you have given us your consent to receive marketing material, we may send you marketing communications, for example when you create an account on our website or show interest in a product or have been in dialogue with us. Please note that we do not share your contact details or other Personal Data with other companies. You can also choose to opt out from receiving marketing communications at any time, by clicking on the relevant unsubscribe link at the bottom of any marketing related email you may receive from us.
- **To improve our services, fulfil our administrative purposes and protect our business interests**  
The business purposes for which we will use your information include, but are not limited to, accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development of our products and services.

## YOUR RIGHTS

If you are an EU data subject, you have certain legal rights under EU data protection legislation, detailed below.

- **Right of access.** You are entitled to be informed as to whether SBGS is Processing Personal Data about you. If we are, you are entitled to information regarding, among other things, which Personal Data we are Processing, the purposes of the Processing, which external recipients have access to your Personal Data, and how long we save your Personal Data.
- **Correction of erroneous data.** You have a right to require that SBGS corrects erroneous or incomplete information about you.
- **Deletion of certain data.** You have a right to require SBGS to delete your Personal Data under certain circumstances.
- **Right to object to SBGS' processing of Personal Data.** You have the right, under certain circumstances, to object to SBGS' processing of your Personal Data.
- **Right to withdraw consent.** If our Processing is based on your consent, you have the right to withdraw your consent to our Processing of your Personal Data at any time. Such withdrawal does not affect the lawfulness of our processing based on your consent before its withdrawal.

If you have questions in relation to your personal data or would like to submit a request for an extract from the register, data portability, correction, deletion, objection, restriction or withdrawal of consent, please contact us at [privacy@sbgs.com](mailto:privacy@sbgs.com).

## SECURITY OF YOUR PERSONAL DATA

SBGS maintains commercially reasonable safeguards appropriate to our size, scope and business that comply in all material respects with applicable laws and industry standards to guard Personal Data against loss, destruction, misuse, improper disclosure, and unauthorized access or modification.

## FOR HOW LONG WE PROCESS YOUR PERSONAL DATA

We will retain your Personal Data for as long as we need it in order to fulfil our purposes set out in this Standard. We may also save your personal data for a longer period of time where necessary in order to fulfil a legal obligation which requires processing by law or in order for us to be able to establish, enforce, or defend against legal claims.

## COOKIES AND OTHER TRACKING TECHNOLOGIES

In order to improve our services and to provide you with more relevant content and to analyze how visitors use our website, we may use technologies, such as cookies or tracking software. For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website to enhance your experience when visiting our website.

## SHARING YOUR PERSONAL DATA

Your personal data may be shared within SBGS and each of its subsidiaries. We may also share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- Suppliers providing services to us in order to help us run our business. If applicable, we share the minimum Personal Data required with the companies who assist us running the services that we provide to you. These recipients are only entitled to process your Personal Data on behalf of SBGS while performing a service for SBGS.
- Authorities. We may disclose your personal data when this is required by the law of any jurisdiction to which we may be subject unless this is expressly prohibited by EU Member State law or the law of an EU country to which SBGS is subject.

## TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EU/EEA

Your personal data will be processed by staff of our subsidiaries in various countries.

The Company discloses and uses Personal Data only in connection with its normal business operations and for no purpose other than as stated herein. Personal Data may be transferred to any country in the world where the Company does business. Where personal data is transferred outside of the EU and it is to a country that does not have the same level of data protection as EU countries, to ensure that your personal information does receive an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU laws on data protection.

## CONTACT INFORMATION

**Questions, comments** and requests regarding this Privacy Policy are welcomed and should be addressed to [privacy@sbgs.com](mailto:privacy@sbgs.com). You also have the right to make a complaint at any time to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

- e-mail: [info@autoriteitpersoonsgegevens.nl](mailto:info@autoriteitpersoonsgegevens.nl)
- Website: <https://autoriteitpersoonsgegevens.nl/nl>

We would, however, appreciate the chance to address your concerns before you approach the DDPA so please contact us in the first instance.