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|  | BUSINESS MANAGEMENT SYSTEM | Doc Ref: BMS-CP-21 | Prepared by: MG |
| | Corporate Policy | Originated: 12 Mar 2024 | Reviewed by: AR |
| | DATA PROTECTION POLICY | Revised: 01 Mar 2025 | Approved by: FM |
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1 PURPOSE

This Policy relates to information from which individuals can be identified and sets out how InterOcean will manage such information.

2 SCOPE

This Data Protection Policy applies to all Personal Data InterOcean processes regardless of how that data is stored or whether it relates to past or present employees, apprentices, workers, contractors, agency workers, volunteers and interns.

This Data Protection Policy applies to all Company Personnel. You must read, understand and comply with this Data Protection Policy. You must also comply with all such Related Policies and Privacy Guidelines, including any amendments. Any employee who is found to have breached this Data Protection Policy may be subject to disciplinary action up to and including summary dismissal.

InterOcean recognises that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. It is a critical responsibility that InterOcean takes seriously at all times.

Whilst employees are required to comply with the terms of this Data Protection Policy, it does not form part of their employment contract.

Please contact the Director, Compliance & Risk with any questions about the operation of this Data Protection Policy or if you have any concerns that this Data Protection Policy is not being or has not been followed.


3 RESPONSIBILITY

The QHSE Manager is responsible for overseeing these guidelines and any questions about the operation of the guidelines should be directed to them.

4 DEFINITIONS

Throughout this Policy, the following definitions apply:

- **Company:**
InterOcean Marine Services Limited
InterOcean Marine Services (Canada) Incorporated
- **Company Personnel:**
All employees, workers, contractors, agency workers, consultants, directors, members
- **Data Controller:**
The person or organisation that determines when, why and how to process Personal Data
- **Data Protection Act 2018:**
The Data Protection Act 2018, as amended from time to time

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- **Data Subject:**

An identified or identifiable individual about whom Interocean holds Personal Data

- **Data Privacy Impact Assessment (DPIA):**

Tools and assessments used to identify and reduce risks of a data processing activity

- **Data Protection Officer (DPO):**

The person required to be appointed in specific circumstances under the GDPR; where a DPO has not been appointed, this term refers to the data protection compliance manager or refers to Interocean data protection/privacy team with responsibility for data protection compliance

- **General Data Protection Regulation (GDPR):**

The EU General Data Protection Regulation

- **Personal Data:**

Any information identifying a Data Subject or information relating to a Data Subject that Interocean can identify (directly or indirectly) from that data alone or in combination with other identifiers

- **Personal Data Breach:**

The loss, or unauthorised access, disclosure or acquisition of Personal Data

- **Privacy Guidelines:**

Interocean Privacy/GDPR and Data Protection Act 2018 related guidelines provided to assist in interpreting and implementing this Data Protection Policy and Related Policies, as amended from time to time; these are available from the Director, Compliance & Risk

- **Privacy Notices:**

Separate notices setting out information that may be provided to you that details why Interocean collects information about you and what the company does with it

- **Processing or Process:**


Any activity that involves the use of Personal Data; this includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it; processing also includes transmitting or transferring Personal Data to third parties

- **Related Policies:**

Interocean's policies, operating procedures or processes related to this Data Protection Policy and designed to protect Personal Data, as amended from time to time; these are available from: the Business Management System (BMS)

- **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.

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5 POLICY

5.1 Types of Data Interocean Holds

Personal data is kept in personnel files or within Interocean's Human Resource (HR) systems. The type of data held by Interocean includes but is not limited to the following:

- name, address, telephone numbers - for individual and next of kin
- CVs and other information gathered during recruitment
- references from former employers
- National Insurance numbers
- job title, job descriptions and pay grades
- conduct issues such as letters of concern, disciplinary proceedings
- holiday records
- internal performance information
- medical or health information
- sickness absence records
- tax codes
- terms and conditions of employment
- training details
- driving records.

Relevant individuals should refer to the appropriate Interocean Privacy Notice for more information on the reasons for its processing activities and the lawful bases it relies on for the Processing. Data retention periods are as detailed in Interocean's Data Retention Policy.

5.2 Personal Data Protection Principles


5.2.1 Lawfulness and Fairness

Data may only be collected by Interocean if the Processing is fair, lawful and for specified purposes, some of which are set out below:

- a. the Data Subject has given his or her consent
- b. the Processing is necessary for the performance of a contract with the Data Subject
- c. to meet Interocean's legal compliance obligations
- d. to protect the Data Subject's vital interests
- e. to pursue Interocean's legitimate interests.

5.2.2 Consent

In some circumstances consent may be required. Consent should be freely given, specific and informed. It may also be withdrawn at any time.

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5.2.3 Transparency

Information in relation to how and why Interocean collects data will be provided through appropriate Privacy Notices.

5.2.4 Purpose Limitation

Personal Data will be collected only for specified, explicit and legitimate purposes. It will not be further Processed in any manner incompatible with those purposes. Interocean will not Process Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained unless the Data Subject has been informed and has consented where necessary.

5.2.5 Data Minimisation

Personal Data will be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. When Personal Data is no longer needed, it is deleted or anonymised in accordance with Interocean's data retention guidelines.

5.2.6 Accuracy

Interocean will ensure that the Personal Data the company uses and holds is accurate, complete, kept up-to-date and relevant to the purpose for which it was collected. Interocean will take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

5.2.7 Storage Limitation

Personal Data will be kept in an identifiable form for no longer than is necessary for the purposes for which the data is processed.


5.3 Security Integrity and Confidentiality

5.3.1 Protecting Personal Data

Personal Data will be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

You must follow all procedures and technologies that Interocean puts in place to maintain the security of all Personal Data from the point of collection to the point of destruction as set out in our corporate policies. Where you work remotely, whether at home or at client sites, or process Personal Data on personal devices, you must follow all guidance Interocean issues in relation to this.

Failure to follow Interocean's rules on data security may be dealt with via Interocean's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

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5.3.2 Reporting a Personal Data Breach

The GDPR and Data Protection Act 2018 require Data Controllers to notify any Personal Data Breach to the applicable regulator and, in certain instances, the Data Subject. Interocean has put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where Interocean is legally required to do so within 72 hours.

If you know or suspect that a Personal Data Breach has occurred, you should contact the Director, Compliance & Risk immediately.

5.4 Transfer Limitation

If Interocean transfers data outwith the EU or UK, Interocean will comply with its guidelines on cross border data transfers that are available from QHSE Manager.

5.5 Company Procedures


Interocean has appointed the QHSE Manager with a specific responsibility for protecting the personal data of individuals in respect of processing and controlling the data. If you wish further information in relation to the steps taken please contact Interocean's QHSE Manager

5.6 Data Subject's Rights and Requests

Data Subjects have certain rights when it comes to how Interocean handles their Personal Data. These include rights to:

- withdraw consent to Processing
- receive certain information about the Data Controller's Processing activities
- request access to the Personal Data that Interocean holds
- request erasure of Personal Data if it is no longer required for the purpose for which it was collected or Processed
- request rectification of inaccurate data
- request incomplete data to be completed
- request to restrict Processing in specific circumstances
- challenge Processing which has been justified on the basis of our legitimate interests or in the public interest
- prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else
- be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms
- make a complaint to the supervisory authority.

You must immediately forward any Data Subject request you make or receive to the Director, Compliance & Risk and comply with Interocean's Data Subject response process. Data Subject requests will be responded to forty-eight working hours after the time at which the request was received by the Director, Compliance & Risk.

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5.7 Accountability

Interocean implements appropriate technical and organisational measures to ensure compliance with data protection principles. Interoccean policies and procedures are one way in which the company demonstrates compliance with the GDPR and Data Protection Act 2018.

5.8 Record Keeping

Where required by the GDPR and Data Protection Act 2018, Interocean will keep full and accurate records of all our data Processing activities. In addition, Interocean will keep records of Data Subjects' consents and procedures for obtaining consents, in accordance with Interocean's record keeping guidelines.

5.9 Training and Audit

Interocean requires all Company Personnel to read and understand the Data Protection Policy when they are inducted. In addition, you will be required to undergo training appropriate to your role to enable you to comply with the GDPR and Data Protection Act 2018.

5.10 Sharing Personal Data

Interocean will only share Personal Data with third parties where certain safeguards and contractual arrangements have been put in place.

Interocean only shares the Personal Data they hold with third parties, including but not limited to our service providers such as benefits providers, payroll providers and professional advisors if:

- Interocean has a lawful basis for doing so
- sharing the Personal Data complies with the Privacy Notices provided to the Data Subject and, if applicable, consent has been obtained, and
- the third party has agreed to comply with the required data security policies and procedures and put adequate security measures in place.


Interocean may share the Personal Data they hold with another employee, agent or representative of our group (which includes our subsidiaries and our ultimate holding company along with its subsidiaries) if the recipient has a job-related need to know the information.

It is Interocean policy that personnel files shall not be provided to potential future employers under any circumstances. Reference requests shall only be provided by the Director, Compliance & Risk who shall only confirm name, job title and dates of employment.

5.11 Changes to this Data Protection Policy

Interocean reserves the right to change this Data Protection Policy at any time without notice to you.

This Data Protection Policy does not override any applicable national data privacy laws and regulations in countries where Interocean operates.

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6 REFERENCE

Policy BMS-CP-08, Information and Data Management

Policy BMS-CP-22, Data Retention Policy

Policy BMS-CP-17, Social Media Policy

Policy BMS-HSEQ-40, Document Control

Privacy Notices

Acknowledgement of Receipt and Review

I acknowledge that I have received and read a copy of this Data Protection Policy, and understand that I am responsible for knowing and abiding by its terms. I understand that the information in this Data Protection Policy is intended to help Interocean Personnel work together effectively on assigned job responsibilities and assist in the use and protection of Personal Data.

Signed

Print Name

Date