

Privacy Policy - Ross Offshore AS

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1. Who is responsible for your data

Our Privacy Policy applies to the personal data that Ross Offshore AS and the fully-owned subsidiary Ross Offshore Well Management AS collect and use.

References in this Privacy Policy to “RO”, “we”, “us” or “our” mean Ross Offshore AS and Ross Offshore Well Management AS (both registered in Norway with registration no (org no) 979 452 314 and 990 672 970 and registered office at Jåttåvågveien 7, 4020 STAVANGER and Solheimsgaten 7E, 5058 BERGEN).

RO controls how your personal data is collected and the purposes for which we use your personal data. RO is the “data controller” (*Norwegian: behandlingsansvarlig*) for the purposes of the Norwegian Data Protection Act and the Regulation (EU) 2016/679 of 27 April 2016 (the GDPR) when the regulation comes into effect in Norway.

Our CEO and Board of Directors are responsible for RO’s and ROWM’s compliance with the new data protection regulation.

2. Personal data we collect about you

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data includes, for example, your name, your contact details or information on how you use our website, or data from when you interact with us.

We collect some personal data from you, for example when you work with RO, use our website, use our services or simply contact us. We may also receive your personal data from our suppliers who provide services to you on our behalf (for example when you provide feedback on our services).

For more information on the parties who may share your personal data with us, please see section 8 below.

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 the personal data mentioned?	Which legal basis do we rely on for processing your personal data?
<p>Your name and surname and your contact details (email address, job title, telephone number and postal address)</p> <p>Login name and password</p>	<p>When you create an account on our website When you interact with one of our staff When you create an account on our website</p>	<p>We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.</p> <p>We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.</p>
<p>Your public CV profile covering the professional part.</p>	<p>When you register your CV in our CV database</p>	<p>We base the processing on our legitimate interest in being able to seek for relevant candidates and inform our customers of your credentials relevant to the open positions.</p> <p>Insofar as we receive any sensitive information from you, e.g. information on your health, our processing will be based on consent, which we will ask you to provide upon receiving the information.</p> <p>In respect of entering into a job assignment we also process your information based on us being able to fulfil the agreement with you or your company for delivering the services.</p>

Information about your bank account number, transactions and other financial details	When you or your company is assigned for a job assignment via RO	We base the processing on us being able to fulfil the agreement with you, e.g. make payments to you or your company. We also have a legal obligation to keep records in accordance with Norwegian accounting rules.
Information about your transactions, including your payment card details	If you purchase RO products or services	We base the processing on us being able to fulfil the purchase agreement or service order with you. We also have a legal obligation to keep records in accordance with Norwegian accounting rules.
Your communications with us (for example, your emails, letters, telephone calls, or your messages)	When you contact RO or you are contacted by RO	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Pictures or videos taken at RO events which may include you.	When you participate in a RO event	<p>We will base the processing on consent, which we will ask you to provide if relevant.</p> <p>In certain circumstances, we may however base the processing on our legitimate interest, if the pictures or videos are of a situational character and does not specifically depict you.</p>
Your posts and messages on social media directed to RO	When you interact with us on social media	<p>We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.</p> <p>We ask that you do not disclose sensitive information such as health information in</p>

		messages on social media platforms. If you do so anyhow, we reserve the right to delete such information from our platform, unless we have a legal basis such as your consent to process the information.
Your feedback	When you reply to our requests for feedback or participate in our surveys	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Your notifications choices	When you choose to provide this information on your account or through managing your account in our CV database	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Information about how you use our website , from where you access it and what system you use when accessing it	When you navigate to and on our websites	We process this information based on your consent, which we ask you to provide when entering our websites.
Information that relates to your job assignment via RO (for example your citizenship, gender, title, next-of-kin)	When you obtain or renew job assignments via RO	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services. We also have a legal obligation to keep records in accordance with Norwegian accounting rules.

Sensitive personal data

In the course of providing services to you we do not collect sensitive data, unless you have provided us with information on your health (e.g. health certificate) or dietary requirements and such information reveals health information about you. In such case, we will seek your consent before we process any such information electronically.

3. How and why we use your personal data

We use your personal data for the following purposes:

To provide professional services to you

When you ask for advice, participate in events or when you use our website to insert your CV and contact data, we use your information to perform our services in relation to you. For example, to answer an enquiry, contact you regarding a relevant job assignment, to issue an invoice etc.

To communicate with you and manage our relationship with you

Occasionally we may need to contact you by email or phone for administrative or operational reasons, for example in order to send you information related to job assignments, invoices, confirmation of payments, or to notify you of disruptions to our services.

Please be aware that these communications are not made for marketing purposes and, as such, you will continue to receive them even if you opt-out of receiving marketing communications from RO.

We will also use your personal data if we contact you after you have sent us a request, registered in our CV database, applied for a job assignment, filled in a web-form through our website or contacted us on social media.

Your opinion is very important to us, so we may send you an email to seek your feedback.

We will use your communications with us and the feedback you may provide in order to manage our relationship with you as candidate, consultant or customer and to improve our services.

To personalize and improve your customer experience

We may use your personal data in order to tailor our services to your needs and preferences to provide you with a personalized customer experience.

We may also collect information on how you use our website, which pages of our website you visit most, in order to understand what you like.

We may use this information to tailor the content and offers that you see on our website and, *if you have agreed to receive marketing communications*, to send you relevant messages that we think you may like.

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.

You can request us to send you news and marketing communications by managing your preferences in our CV database.

If you are happy to receive marketing communications, we will provide you with news, such as newsletters, publications or events.

In addition, as a registered candidate in our CV database, you will receive information relevant or related directly to your CV and competence. Such information is not considered news or marketing.

Please note that we **do not** share your contact details or other personal data with other companies for marketing purposes, unless we have first obtained your written prior consent to do so.

If you do not want to receive marketing communications from us, you can simply tell us so by clicking the relevant box on our website www.rossoffshore.no

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.

If you have registered in our CV database, you can easily manage your news and marketing preferences through your account and you can at any time opt out from receiving marketing communications.

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.

4. Your rights

You have certain legal rights under EU data protection legislation, which you can enforce against RO. Set forth below is a summary of these rights. For complete information regarding your rights, please see the General Data Protection Regulation (Regulation (EU) 2016/679), sections 3–5.

Right of access. You are entitled to be informed as to whether RO 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.

Right to data portability. You have a right to receive a copy of the personal data which you have provided to RO, in a structured, commonly used, and machine-readable format. You also have the right to require that RO transfers this personal data to another controller of personal data. The right to data portability applies to personal data which is processed in an automated manner and which is based on your consent or on an agreement to which you are a party.

Correction of erroneous data. You have a right to require that RO corrects erroneous or incomplete information about you.

Deletion of certain data. You have a right to require RO to delete your personal data under certain circumstances, for example where the personal data is no longer necessary for the purpose for which we collected it.

Right to object to RO's processing of personal data. You have the right, under certain circumstances, to object to RO's processing of your personal data.

Right to object to direct marketing. You have the right at any time to object to RO processing your personal data for direct marketing purposes. If you object to such processing, RO must discontinue all direct marketing to you without undue delay.

Right to restrict the processing of your personal data. You have the right to require RO to restrict its processing of your personal data in certain circumstances. For example, if you have denied that your personal data is correct, you can request a restriction on the processing during a period of time which allows RO to verify whether the personal data is correct.

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.

Complaints. If you have any complaints regarding the RO's processing of your personal data, you are entitled to file such complaints with the Data Protection Authorities.

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@rossoffshore.no.

5. Security of your personal data

We are committed to taking appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data that we process about you. When you provide your personal data through our website or online services, this information is transmitted across the Internet securely using high-grade encryption.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. If RO discloses your personal data to a third party, we require that third party to have appropriate technical and organizational measures in place to protect your personal data.

The information that you provide to us will be held on hosted systems not owned by us, which are located in premises of an appointed third party within the EU. We may also allow access to your information by our subcontractors who act as data processors on our behalf for the purposes described in this Privacy Policy or for other purposes approved by you.

6. 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 Privacy Policy.

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.

7. Cookies or 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. A cookie is a small text file, which is stored on your computer in order to recognize your computer at recurring visits. A cookie cannot retrieve information from your computer and cannot carry any virus or other damaging files.

For example, we may 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.

The cookies and tracking technologies used on RO's websites are placed by RO itself and will not be disclosed to third parties.

RO's website has auto-login, only links to other sites you can log on to (such as job vacancies via CRM) and sites that our employees may log on to. In CRM we have another privacy policy that must be accepted in order to enter into our CRM site.

Insofar as the tracking technologies that we use collect personal data such as your IP-address, we rely on our legitimate interest as the legal basis for such processing. The legitimate interests we pursue in this regard is to help us understand how users of our website navigate on our site in order to develop the design and layout and enhance the user experience for visitors of the website.

You can at any time remove the cookie created via RO's website. To remove, follow your browser's guide to disable or delete cookies. Session cookies only live for the duration of your session.

8. Sharing your personal data

Your personal data may be shared within RO and ROWM.

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 mentioned below who assist us running the services that we provide to you. These recipients are only entitled to process your personal data on behalf of RO while performing a service for RO.

RO takes all reasonable legal, technical and organizational measures in order to ensure that your data is handled securely and with an adequate level of protection when transferring to, or sharing with, such selected third parties. The third parties assisting us with providing the above list of RO services are:

- Netscenario
- R8
- Unit4 (Current)
- Microsoft Cloud Services

The personal data that we transfer to the above suppliers varies depending on the kind of product or service we deliver to you as specified in the brackets. In most instances the above-mentioned suppliers will have their own set of Terms of Use detailing the types of personal data stored by the supplier in the respective system.

RO has entered into written data processing agreements with all of the above-mentioned suppliers, in order to protect your personal data. To the extent your data is transferred to a country outside the EU/EEA, such transfer will be based on the Commissions Standard Contractual Clauses, 2010/87/EU.

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 RO is subject.

9. Transfers of personal data outside of the EU/EEA

Your personal data will be processed within the EU/EEA.

10. Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time, including as part of the new Norwegian data protection legislation which will start to apply on 1 July 2018.

11. Contact information

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to privacy@rossoffshore.no.