
Client Privacy Policy **2024**



Introduction

1.1 IN THIS PRIVACY POLICY:

1.1.1 References to **we, us or our** means the **Petrofac entity that supplies you with services and is identified in the contract we have with you or the Client.**

The main Petrofac entities that supply services are:

1.1.2 Petrofac Facilities Management Limited a limited company registered in Scotland (company number: SC075047), whose registered office is Bridge View, 1 North Esplanade West, Aberdeen, AB11 5QF;

1.1.3 PTS BV a company registered in the Netherlands (company number: 52830993), whose registered office is Bargelaan 200, 2333 CW, Leiden, Netherlands;

1.1.4 Petrofac Services Limited a limited company registered in England (company number: 04842802), whose registered office is 117 Jermyn Street, London, SW1Y 6HH; or

1.1.5 Oilennium Limited a limited company registered in England (company number: 04342156), whose registered office is 4th Floor, 117 Jermyn Street, London, SW1Y 6HH;

1.1.6 references to **you** or **your** means any individual who we supply services to or is otherwise engaged or employed by one of our Clients;

1.1.7 references to **Client** means any organisation that we supply services to; and

1.1.8 references to the **Website** means the websites which are operated by a member of the Petrofac Group and such other of the Group's websites as we may operate from time to time.



Privacy policy

2.1 This Privacy Policy (together with the terms of engagement or contract which governs our supply of services) sets out the basis on which we collect and use personal information about you when we supply services to you or our Client.

2.2 THIS PRIVACY POLICY DESCRIBES:

2.2.1 who is responsible for the personal information that we collect about you;

2.2.2 the personal information we collect about you;

2.2.3 how we will use it;

2.2.4 who we may disclose it to; and

2.2.5 your rights and choices in relation to your personal information.

This is to make sure you have a full picture of how we collect and use your personal information.

2.3 In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and other individuals (for example, your emergency contact/next of kin) and which identifies you or those individuals.

2.4 You have the right to object to our use of your personal information in certain circumstances. A summary of your right to object (along with other rights under data protection law) and the details of who to contact if you want to exercise them can be found at paragraphs 12 and 14 below.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

3.1 We are the data controller for the purpose of data protection law in respect of your personal information collected and used in connection with the provision of services by us to you or our Client. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

Personal information

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

4.1 We collect and use personal information about you in the course of us providing services to you or our Client.
The personal information we hold includes:

4.1.1 Information that you provide to us / we collect from you.

The information that you provide to us / we collect from you may include the following:

Type of Personal Information	Examples
GENERAL	
Contact information	Name, title, address, date of birth, email address, nationality, gender and telephone number.
Log in details	Username and account number for access to Websites and systems provided under our contract with you or the Client.
FINANCIAL	
Financial information and account details.	National insurance number, bank account number or other financial account number and account details.
MARKETING	
Marketing preferences (including details of subscriptions to any newsletters).	Details of any marketing preferences that you express including any opt outs you provide.
OTHER	
Training information	etails of any training which you attend and any qualifications obtained as a result, as well as details of existing and top up qualifications.
CCTV footage	Images captured on CCTV if you visit our premises.
Surveys	Your views and opinions about our services.
Online activity information (to the extent that it constitutes personal information).	Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Information about your visit to the Websites, including the full Uniform Resource Locators (URL) clickstream to, through and from the Websites (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

This information will be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) when you fill in forms for us (including those on the Website);
- (c) via our social media pages, other social media content, tools and applications; and
- (d) when you provide personal information via our when you provide personal information via our Websites or using other systems which we provide to you or the Client.

1.1.2 Information we receive / collect from other sources

- (a) When we carry out a limited credit check on Clients, we may receive personal information from the provider of these checks such as the names of directors, their addresses and details of previous roles they have held. No credit checks will be undertaken on you individually.
- (b) We may collect personal information from publicly available sources such as LinkedIn, including your name, role and business contact details.

Sensitive personal information

5. WHAT SENSITIVE PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

5.1 We may also hold certain sensitive personal information (including any special categories of personal data) about you. This may include current or previous physical, mental or medical condition, health status, injury or disability information for the purposes of facilitating our correspondence with you or delivering services to you (including to assess your fitness to attend a training session we deliver).

5.2 If we collect criminal records data about you from the disclosure and barring service, we will provide you with further detail about this and how we will use the relevant personal information (including our legal basis for using the information) before we collect this information.

6. INFORMATION ABOUT THIRD PARTIES

6.1 In the course of us providing services to you or our Client, you may provide us with personal information relating to third parties. For example, you may provide us with the name and contact details of your emergency contact/next of kin so that we can contact them in an emergency situation.

6.2 We will use this personal information in accordance with this Privacy Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party or are otherwise entitled to share such personal information with us and that you have made the information in this Privacy Policy available to the third party.



Collecting personal information

7. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

- 7.1** We use your personal information for a variety of different purposes during the course of us providing services to you or our Client. The main purposes for which we use your personal information are set out below. Under data protection law, we can only use your personal information if we have a legal basis to do so. Examples of where we have a legal basis to process your personal information, includes when:
- 7.1.1** we have your consent;
- 7.1.2** it is **necessary to enter into or perform a contract** we have with you (or to **take steps at your request prior to entering into that contract**);
- 7.1.3** it is necessary to comply with a **legal obligation**;
- 7.1.4** it is necessary in order to **protect your vital interests**; or
- 7.1.5** it is in our **legitimate interests** to process your personal information.
- 7.2** We have set out the main purposes for using your personal information in the table below together with our Legal Basis for doing so. Where we rely on our legitimate interests, we have set out those interests in the table opposite.
- 7.3** When we process your sensitive personal information (see paragraph 5 above), we will use it for the purposes set out above and rely on one of the following legal bases; either:
- 7.3.1** your **explicit consent**; or
- 7.3.2** one or more of the other legal bases set out in the table opposite and one of the following:
- (a)** the use is **necessary for the establishment, exercise or defence of legal claims**, or whenever courts are acting in their judicial capacity (for example, when a court issues a court order requiring the processing of your sensitive personal information); and
- (b)** it is in your **vital interests**
- 7.4** We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or our Client (as applicable) or in preparation of us entering into a contract with you or our Client (as applicable). If you do not provide the relevant personal information to us, we may not be able to perform our obligations pursuant to your contract with us.

PURPOSE	LEGAL BASIS
To communicate with you and other individuals.	<p>Legitimate interests: We require your personal information in order to communicate with you or the Client in relation to the supply of services in accordance with the terms of the contract.</p> <p>Performance of a contract we have with you. This will only be applicable if you are a sole trader or part of a general partnership who we are providing services to.</p>
To carry out our obligations arising from any contracts entered into between you and us or in preparation of entering into a contract with you or the Client.	<p>Legitimate interests: It is in our legitimate interest to comply with the terms of a contract we have in place with a Client.</p> <p>Performance of a contract we have with you. This will only be applicable if you are a sole trader or part of a general partnership who we are providing services to.</p>
To send you direct marketing communications about our products/services and to share your personal information with other members of the group of companies so that they can send you direct marketing communications about their products/services.	<p>Legitimate interests: It is in our legitimate interest to contact you about services that we offer.</p> <p>Consent: In some circumstances, we may rely on your consent to send direct marketing communications to you.</p>
To manage any service or quality related issues, complaints, feedback and queries in relation to the supply of services in accordance with the terms of the supply contract.	<p>Legitimate interests: We require your personal information in order to ensure the services we supply are fit for purpose.</p> <p>Performance of a contract we have with you. This will only be applicable if you are a sole trader or part of a general partnership who we are providing services to.</p>
To analyse the services we provide to you and improve the quality/performance of our services.	Legitimate interests: We require your personal information in order to improve the services we provide.
To comply with any legal or regulatory obligations (including in connection with a court order).	Necessary for compliance with a legal obligation to which we are subject.
To carry out credit reference checks on the Client.	Legitimate interests: We undertake these checks to certify and assess your financial standing to ensure we receive payment for the provision of our goods and services.

Disclosing information

8. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

- 8.1** We may share your personal information with:
- 8.1.1** our business partners, service providers and sub-contractors for the performance of any contract we enter into with you (for example, our IT providers, marketing service providers, security service providers, insurance providers and document storage providers);
- 8.1.2** our professional advisors (including accountants, lawyers and auditors) that assist us in carrying out our business activities (for example EY); and
- 8.1.3** other companies and entities within the Petrofac group (which we are a member of). For a list of these companies please contact us using the details at paragraph 14 below.
- 8.2** For a full list of the third parties with whom your particular personal information may be shared, please contact us using the details at paragraph 14 below.
- 8.3** We will also disclose your personal information to other third parties, for example:
- 8.3.1** in the event that we sell or buy any business or assets, we will disclose your personal information to the prospective seller or buyer of such business or assets;
- 8.3.2** if we or substantially all of our assets are acquired by a third party, personal information held by us will be one of the transferred assets; and
- 8.3.3** if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

9. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

- 9.1** Due to the international nature of our business, we process your personal information both nationally and internationally for the purposes set out above. This will include transferring your personal information outside either the United Kingdom (UK) or the European Economic Area (EEA) (including to other members of our group of companies) depending on where we are located.
- 9.2** The countries outside of the UK and the EEA which we may transfer your personal information to include Australia, India, Malaysia, Mexico, New Zealand, Thailand, Tunisia, UAE and the United States of America (USA).
- 9.3** When we (being an entity located in the EEA) transfer your personal information outside the EEA, we will take steps to ensure that such information will be adequately protected, including by:

- 9.3.1** relying on the fact that a country has been approved by the European Commission as providing adequate protection (such as New Zealand); or
- 9.3.2** using standard data protection clauses which have been adopted by the European Commission and can be accessed [here](#)
- 9.4** When we (being an entity located in the UK) transfer your personal information outside the UK to a non-EEA country, we will take steps to ensure that such information will be adequately protected, including by:
- 9.4.1** relying on the fact that a country has been approved by the UK Information Commissioner's Office as providing adequate protection; or
- 9.4.2** using standard data protection clauses which have been adopted by the European Commission (and approved for use by the UK Information Commissioner's Office) and can be accessed [here](#).
- 9.5** This approach is compliant with applicable data protection law (being Articles 45 or 46.2 of the General Data Protection Regulation). For further information about these transfers and the safeguards in place (including to obtain a copy of any documents in place), please contact us using the details at paragraph 14 below.

Storing information

10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

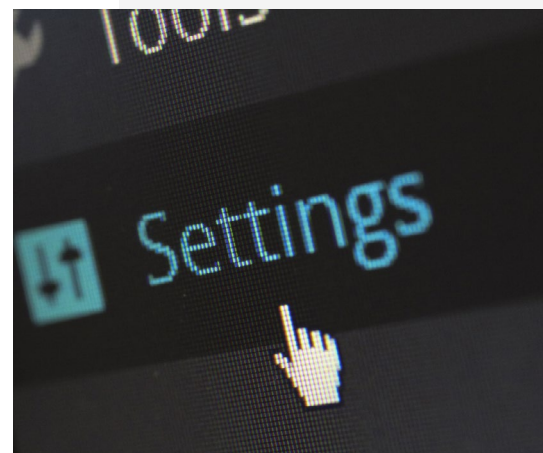
10.1 We will retain your personal information for no longer than is necessary for the purposes for which the personal information are processed. The length of time we hold on to your personal information will vary according to what that information is and the reason for which it is being processed.

10.2 For further information about how long we keep your personal information, please contact us using the details at paragraph 14 below.

11. DATA SECURITY

11.1 We have put in place appropriate security measures to guard against your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For further information about these measures, please contact us using the details at paragraph 14 below.

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



Your rights

You have certain rights with respect to your personal information. The rights will only apply in certain circumstances and are subject to certain exemptions.

Please see the table below for a summary of your rights. Details of who to contact to exercise these rights can be found in paragraph 14.

SUMMARY OF YOUR RIGHTS	
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you and information about how we use it, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information	<p>You have the right to ask that your personal information be deleted in certain circumstances.</p> <p>For example:</p> <ul style="list-style-type: none">> where your personal information is no longer necessary in relation to the purposes for which it was collected or otherwise used;> if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information;> if you object to the use of your personal information (as set out below);> if we have used your personal information unlawfully; or> if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	<p>You have the right to suspend our use of your personal information in certain circumstances.</p> <p>For example:</p> <ul style="list-style-type: none">> where you think your personal information is inaccurate but only for so long as is required for us to verify the accuracy of your personal information;> the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead;> we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or> you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	<p>You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.</p> <p>The right only applies:</p> <ul style="list-style-type: none">> to personal information you provided to us;> where we rely on the following legal bases:> consent; or> for the performance of a contract; and> when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	<p>You have the right to object to the use of your personal information in certain circumstances and subject to certain exemptions.</p> <p>For example:</p> <ul style="list-style-type: none">> where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and> if you object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	<p>If you think that we have processed your personal information in a manner that is not in accordance with data protection law, you can make a complaint to the relevant data protection regulator.</p> <p>In the UK this is the Information Commissioner's Office (ICO) and they can be contacted on 0303 123 1113 or please see www.ico.org.uk. If you live or work in an EEA member state, you may complain to the regulator in that state.</p>

Extra information

13. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy in the future will be posted on this page and, where appropriate, we will give you reasonable notice of any changes.

14. QUERIES

14.1 If you have any questions regarding this Privacy Policy or the way we use your personal information, please contact us by:

14.1.1 email at dataprivacy@petrofac.com; or

14.1.2 post at FAO Group Legal, 117 Jermyn Street, London, SW1 6HH.