

SPIRIT ENERGY PRIVACY POLICY

Updated 20 September 2022

Spirit Energy Limited and its affiliates* believe it is important to protect your privacy, and so we are committed to giving you a service that meets your needs in a way that also protects your privacy. This notice explains how we may collect information about you and then use it to meet your needs. It also explains some of the security measures we take to protect your privacy and tells you certain things we will not do.

1. Spirit Energy and your personal data

For Spirit Energy's oil and gas exploration and production activity, the data controller is Spirit Energy Limited.

This privacy notice explains your statutory rights and how we collect and use your personal data. It describes the processing activities that are carried out by Spirit Energy in relation to this website, the purposes for which these activities are performed and the legal bases that Spirit Energy relies upon for these processing activities.

This notice applies to personal data we hold. It does not apply to information which we hold about companies and other legal organisations. In the vast majority of cases, the data which Spirit Energy processes is not personal data.

2. Personal data we may collect

We do not collect any personal information about individuals unless it is specifically and knowingly provided by them. If you decide to contact us or send us an email enquiry or we collect your personal information and use that information as required for us to handle your query. Examples of the private information we may collect include your name, email address, occupation, and country. We may use that information to tell you about the company's latest news, to communicate with you or share information that you have asked for.

If you exercise any of your statutory rights under Data Protection Law, we will keep a record of this and how we respond.

When you apply to become part of the Spirit Energy team via our career's website and online application form, your information will be processed solely for the purposes in which it is provided and will be retained for a period necessary to comply with our legal and administrative requirements.

When you visit the site, we also, through the use of cookies and/or other similar technologies, gather information automatically about your browser type, IP address and details of how you accessed the website and the pages you visited. We use this analytical information to help us understand how visitors use the website and make improvements to the layout, content and/or performance of the site. For more information on cookies, please see our Cookies Policy.

3. Sources we collect your personal data from

We will collect personal data from the following sources:

- **Directly from you:** When you communicate with us directly or in some other way e.g., by submitting information via our website, applying for a job, make a claim or complaint, exercise your statutory rights, contact us by phone or email.
- **Our website:** We collect information about how you use our website.

4. Who we share your personal data with

We may store or transfer your personal data to our other Group companies around the world. We transfer and store your personal data with security measures in place. In certain circumstances, we may share your information with selected service providers who perform functions on our behalf such as providing IT and other support and maintenance services that help us run the website. Our service providers will only use your information to the extent necessary to perform their functions.

We have the right to share your information with law enforcement or public authorities if legally required to do so, or to prevent security, fraud, or technical issues.

5. Transferring your personal data internationally

Spirit Energy is part of a multi-national organisation, and in common with other organisations, we may use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our counterparties are located. This may include countries outside the European Economic Area ("EEA") and to countries that do not have laws that provide specific protection for personal data. In such cases we take steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully. Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

6. How long we keep personal data for

We will only keep your personal data for as long as necessary to achieve the processing purposes for which it was collected, before making it non-identifiable or deleting it in accordance with our retention schedule.

7. Your rights in relation to your personal data

You may have the following rights in relation to your personal data:

- Right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources.
- Right to access – you have the right to ask us for copies of the personal information we hold about you.
- Right of rectification – you have the right to ask us to rectify personal information that we hold about you that you think is inaccurate or incomplete.
- Right to be forgotten/erasure – you have the right to ask us to erase your personal information in some circumstances
- Right to restriction of processing – you have the right to ask us to restrict the processing of your personal information in certain circumstances.



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- Right of portability – you have the right to ask that we transfer the personal information you gave us to another organisation, or to you in certain circumstances.
- Right to object – you have the right to object to processing of your personal information in certain circumstances.
- Right to object to automated processing, including profiling where this processing results in a decision with a legal or similarly significant effect on you. This right does not apply if decisions resulting from the automated processing:
 - Are necessary for entering into or the performance of a contract between you and Spirit Energy
 - Are authorised by UK or EU Law
 - Are based on your explicit consent
- Right to judicial review – If Spirit Energy refuses your request under rights of access, we will provide you with a reason as to why.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us using the details set out below.

8. Get in touch

If you have any privacy-related questions or comments, please contact Spirit Energy's data protection officer by writing to:

The Data Protection Officer,
Spirit Energy Limited,
IQ Building,
15 Justice Mill Lane,
Aberdeen AB11 6EQ.

You can also contact our data protection officer at compliance@spirit-energy.com

If you are unhappy with the way, we are using your personal data you can also complain to the UK Information Commissioner's Office. We are here to help and encourage you to contact us first to resolve your complaint.

9. Policy updates

We regularly review and update our privacy policies in line with regulatory recommendations. This privacy notice was last updated on 20 September 2022.

**Affiliate being the ultimate holding company and any subsidiary (other than Spirit Energy Limited) of Spirit Energy Limited's ultimate holding company (as the terms "holding company" and "subsidiary" are defined in Section 1159 of the Companies Act 2006*



LEGAL INFORMATION

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