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ESS&SA Privacy Policy



1. INTRODUCTION

At ESS&SA safety and security is upfront at all that we do. We deliver security in an easy and accessible way. Understanding how and why we use your information should be just as easy and accessible. Our Privacy Policy provides you with transparent information on who and why we collect, use and (occasionally) distribute your data.

This Privacy Policy describes the type of information we collect from you in order to successfully deliver our services. It also explains how we may process, transfer, store and disclose the collected information. Finally, you will find explanation on how to control certain use of the collected information.

ESS&SA is the data controller in respect of certain processing activities as outlined below. Occasionally we may distribute this data to third parties being processor of your data. ESS&SA is registered in Amsterdam, The Netherlands under registration number 34372894.

Personal information or personal data: in this Policy, personal information or personal data is defined as 'information that refers or is related to or is associated with an identified or identifiable individual or as otherwise may be defined by the applicable law'.

2. PRIVACY POLICY SUMMARY

Below key points summarize our Privacy Policy. For detailed explanation please access below.

a. Personal information we collect

ESS&SA collects personal information such as name, surname, birthdate, address, passport copy, certificates, training, background checks, bank details, next of kin, e-mail address. If you contact us for questions of complaints, we collect the information related to your inquiry. When working for ESS&SA, we collect information with regard to your performance. We collect your name and e-mail address for internal marketing purposes, such as promotions, to be sent to you upon your consent.

b. Basis for processing your information

Processing your information is necessary for the execution of ESS&SA's services and in order to improve such services or measure our performance. Additionally, your information is collected in order to allow our service providers to aid ESS&SA in its service delivery (e.g. agents). Your personal information is collected for communication purposes for ESS&SA to be able to reach you. In limited occasions your information is processed for internal service improvement purposes and for measurements of ESS&SA's service delivery. Finally, your information might be used as prescribed by the applicable legislation or as required by certifying bodies for the purpose of legitimate interests we pursue.

c. How we use the information we collect

We use the information we collect mainly in order for ESS&SA to allow to perform her services, to contact you with administrative and operational information and to improve our service delivery.

d. Sharing the personal information we collect

We may share your personal information with our subcontractors and our service providers who assist us with our operational delivery, and process your information on our behalf and under our instructions in order to allow the execution of the services. We might be required to share (some) of your personal information with legislative bodies or for incident management purposes.

e. International transfer

ESS&SA uses service providers and subcontractors and business relations and business partners located in countries outside yours. We also might be required to send them your information. We guarantee to have agreements in place with these parties ensuring same level of privacy and data protection we offer you in this Privacy Policy. You hereby consent to such international transfer.

f. Your rights

Subject to applicable law, and other rights set out in this Privacy Policy, you may have the right to access, update and or delete your Personal Information, or request a copy of the information we collect about you. Subject to applicable law, you may have the right to object to processing our

personal data in certain circumstances. Please do bear in mind that certain objection might force ESS&SA to terminate your agreement as such data is required for the project agreement.

g. Changed to Privacy Policy

ESS&SA regularly updates its policies and processes and we, therefore, might change this Policy from time to time. You will be notified on such changes.

3. PERSONAL INFORMATION WE COLLECT

We collect information from you when you chose to use our services or when you permit to collect your information for the purpose of working for ESS&SA, and/ or when you visit or use our website. In order to use our services, you will be required to provide ESS&SA information in order to be able to execute the services, or when you register to receive ESS&SA's promotions or service related information. We also collect personal information when you sign up for newsletters, or our email lists, complete online enquiry form, or contact us for any other reason. We also collect any materials including service performance images, text, documents, video recordings, comments, reviews, you may provide, as required by our policies and procedures, however only for reason of ESS&SA service execution or improvement. It is your voluntary decision to provide us with such information, however if you refuse, we might be unable to assign you for service delivery or mobilize you to your dis/embarkation point.

4. HOW WE USE YOUR PERSONAL DATA

a. General

ESS&SA or any of our reliable third party service providers may use the personal information we collect from you and about you, for any of the following purposes:

- a. To allow ESS&SA to execute services;
- b. To mobilize you to your point of dis/embarkation;
- c. To be able to act in case of emergency or crisis for your own safety and security;
- d. To be able to draft service related documents;
- e. Financial data for payment purposes;
- f. To respond to your enquiries, requests, contact and communication with you;
- g. To develop new services or perform analysis of the current services for improvement or measurements;
- h. To contact you with newsletters or promotions on ESS&SA services;

- i. To review our website;
- j. To provide you with ESS&SA performance reports;
- k. To respond to request to certifying bodies;
- l. To respond to request from legislative bodies;
- m. As might be required by local/ international regulation.

b. Analysis

Within ESS&SA, perseverance is measured in order to improve services or enter new markets. Statistical information helps ESS&SA to understand trends within its performance and monitor development of the industry. This also helps to map client needs so new services match the market request. Further, the information is presented to internal stakeholder such as Top Management of certifying bodies as dictated by the licencing.

Statistical information is always anonymous and there is no link to the personal data used. ESS&SA may share this information to limited number of stakeholder, for example financial institutions, on commercial terms determined within the Company.

c. LinkedIn

ESS&SA holds a Company Profile at LinkedIn. No personal information or data is disclosed here or provided to the platform for any reason. The information shared on the website is strictly in relation to ESS&SA as a Company.

d. Social Media

ESS&SA does not use any of the personal data collected on any social media platform (exception point c). ESS&SA and its contractors, subcontractors, clients, third parties follow a strong policy regarding the non-disclosure of any personal information related to ESS&SA or services on social media platforms.

Any personal information that you may find on social media platforms, that you have provided to ESS&SA, has at all times, been published by other party than ESS&SA.

e. Legal Use

ESS&SA may use your personal information as required or permitted by any applicable law.

f. Certifying bodies

ESS&SA may use your information anonymously as required by the certifying bodies ESS&SA is licenced by. ESS&SA strictly follows the applicable privacy policy of the certifying bodies, within the rules set out in the General Data Protection Regulation (GDPR).

5. DISCLOSURE OF INFORMATION

ESS&SA may, in certain occasions, share your information to other parties, as follows.

a. Service Providers, Subcontractors and Business Partners

ESS&SA may disclose information, including your personal data we collect from and about you, to our reliable business partners, or subcontractors, or service providers. These parties may use such information to:

- a. Allow ESS&SA to perform its services;
- b. Allow third parties to perform services on behalf of ESS&SA;
- c. Aid in their service provision for ESS&SA.

b. International transfer to third parties

ESS&SA has third parties and service providers located outside the countries other than your own, or outside the European Union, and send them your personal data. ESS&SA ensures that these parties are subject to written agreements ensuring the same level of privacy and data protection as by ESS&SA. You hereby provide consent to such international transfers.

c. Business transfers

ESS&SA might occasionally be required to transfer information, including your personal data, to third parties if ESS&SA sells (part of its) business, including case of liquidation or other type of business termination. Information disclosed during these types of transfers and negotiations will remain subject to this privacy policy.

d. Law enforcement disclosure

ESS&SA operates internationally in multiple countries and is subject to a great number or (local) legislation. ESS&SA will always collaborate with any law enforcement authorities or body, requesting ESS&SA to disclose identity, behaviour or other information of an individual, including

in the event of any suspicion in the illegal activity. In addition, ESS&SA might consider to disclose information in the case when:

- a. ESS&SA believes in good faith that disclosure is necessary to protect our rights and safety;
- b. To protect rights and safety of others;
- c. When required so by law;
- d. When necessary to comply with any legal or regulatory obligation of the Company.

You can request such information via email on qhse@ess-sa.eu.

6. DATA PROTECTION

ESS&SA always makes great effort to protect your personal information submitted to ESS&SA or once we have receive it. Please do bear in mind that no method of transmission over the Internet is 100% secure. Therefore ESS&SA will use all best effort available and follow industry standards to protect your personal information to the highest extend possible. ESS&A, however, cannot guarantee its absolutely security.

7. YOUR RIGHTS

You have rights in relation to your personal information you will find below. ESS&SA reserves the right to verify your identity prior to enclosing any type of information requested.

a. Right to access

You have the right to know which information is collected about you and in some cases, you have the right to request ESS&SA to communicate this information to you.

Subject to the limitation of the applicable law, you may be entitled to request a copy of personal information provided to ESS&SA, in a digital format. You also may request to transmit such personal information to ESS&SA.

If you wish to exercise your rights, please get in touch and letting ESS&SA know which exact information you would like to receive. Please be informed that we will not be able to disclose information that contains information of other individual, or in cases of limitations by law. In these cases, ESS&SA will do it outmost best to explain you why we cannot comply with your request.

ESS&SA Compliance Department will respond to your enquiry as soon as possible.

b. Right to correct

Subject to limitation of the applicable legislation, you have the right to update, correct, delete or change inaccurate or outdated information we possess. You are entitled to request ESS&SA to temporarily terminate the use of incorrect or outdated personal data.

ESS&SA will correct your personal data within reasonable time from the receipt of your written request to do so.

c. Right to delete

In some cases, you have the right to request ESS&SA to delete your personal data. Should you wish your personal information to be deleted, please contact ESS&SA on qhse@ess-sa.eu with your written request.

Subject to any applicable law, ESS&SA will delete your personal data within a reasonable time from the receipt of your request. Please be advised that deleted information cannot be restored. ESS&SA reserves the right to retain certain information of record – keeping, audit and performance measurement purposes, or as dictated by any applicable law. This information will be kept as anonymized as practically possible.

d. Marketing

May with wish to unsubscribe from any commercial mailing by ESS&SA regarding company news, promotions or industry updates, please send ESS&SA written request on qhse@ess-sa.eu.

ESS&SA does not transfer any of your information to third parties with any type of marketing or commercial purposes. All information collected is strictly used for internal performance improvement.

ESS&SA will process your request as soon as possible, however you might accidentally receive one last marketing email in case the mailing has been activated prior to your request.

8. DATA RETENTION

ESS&SA retains information as necessary for the purposes set out in this policy. ESS&SA reserves the right to delete information, without informing you, if the information is no longer needed for the purposes set forth in this policy.

9. CHANGES

ESS&SA may update the Privacy Policy form time to time and you will be notified of such changes. Please access the Privacy Policy on your own discretion to stay updated with the changes.

10. QUESTIONS

If you have any question or comments on our Privacy Policy, ESS&SA is available to assist you on qhse@ess-sa.eu.

11. CONTACT US

ESS&SA can be contacted for any question or comment on:

info@ess-sa.eu (General Enquiries)

qhse@ess-sa.eu (Compliance Enquiries)

+3120 303 02 01

