



## INTRODUCTION

Welcome to the Trident Energy website privacy notice.

Trident Energy respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Trident Energy collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

**Trident Energy Management Limited** is the controller and responsible for your personal data (collectively referred to as Trident Energy, “we”, “us” or “our” in this privacy notice).

The role of data privacy manager is undertaken by the General Counsel of Trident Energy, who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### CONTACT DETAILS

Full name of legal entity: Trident Energy Management Limited

Name or title of data privacy manager: General Counsel

Email address: [trident.gdpr@trident-energy.com](mailto:trident.gdpr@trident-energy.com)

Postal address: 129 Wilton Road, London, SW1V 1JZ

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 24 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website.
- **Communications Data** includes your preferences in receiving communications from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by



post, phone, email or otherwise. This includes personal data you provide when you:

- apply for a job with Trident Energy;
- create an account on our website;
- make an enquiry;
- request communications to be sent to you; or
- give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We do not currently use cookies on our website.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. If we do request your consent to process certain personal data, you have the right to withdraw consent in respect of such data at any time by contacting us.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|                                 |   |
|---------------------------------|---|
| <b>Name of data controller</b>  | <b>Trident Energy Management Limited (“TEML”)</b> |
| Automated decisions we may take | None  |
| Purposes for                    | TEML will process the personal data for:          |

|   |   |
|---|---|
| <b>Name of data controller</b>                | <b>Trident Energy Management Limited (“TEML”)</b>   |
| which we process personal data                | <ul style="list-style-type: none"> <li>• Evaluating applications for employment</li> <li>• Verifying you have the right to work for TEML</li> <li>• Managing and supporting employees and contractors</li> <li>• Paying employees and contractors</li> </ul>  |
| Who we will disclose your personal data to    | <ul style="list-style-type: none"> <li>• Trident Energy L.P. – TEML’s parent company</li> <li>• Any TEML group companies</li> </ul> <p>If you are unsure if your data has or will be disclosed to any company on this list please contact us at the email address below.</p>  |
| Legal basis for processing your personal data | <p>The legal basis for the collection and processing of your personal data is:</p> <ul style="list-style-type: none"> <li>• to meet our legal obligations to:             <ul style="list-style-type: none"> <li>○ ensure you have the right to work for TEML</li> <li>○ discharge our duty of care towards employees and contractors</li> </ul> </li> <li>• to meet our contractual obligations to:             <ul style="list-style-type: none"> <li>○ fulfil the contract of employment employees have with TEML</li> <li>○ fulfil the service contracts contractors have with TEML</li> </ul> </li> <li>• you have given your explicit consent in respect of any medical or other sensitive data you provide to us</li> <li>• you have given your explicit consent in respect of sending you communications</li> <li>• in all other cases: that it is necessary for our legitimate interest which is to legally and efficiently manage an oil and gas exploration and production business in the UK and our countries of operation.</li> </ul> |
| Your right to withdraw consent                | <p>Where you have given your consent to any processing of personal data, you have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of any processing for which we had consent prior to your withdrawing it.</p>   |
| Location of your personal data                | <p>TEML will keep most of your personal data within the European Economic Area (“EEA”) Some TEML group companies are outside of the EEA but adhere to the same standards of data privacy as TEML to protect your data.</p>  |
| How long we will keep your personal data for  | <p>If you apply for a job with TEML we will keep your personal data on file for one year. After this time period we will delete your data. If you become an employee we will normally keep your personal data as long as you an employee. After the end of your employment contract we will keep certain key personal data for 6 years to meet our company’s audit obligations. After this time period we will delete your data.</p>  |



|  |   |
|--|---|
| <b>Name of data controller</b>               | <b>Trident Energy Management Limited (“TEML”)</b>   |
| Your rights in respect of your personal data | You have the right of access to your personal data and, in some cases, to require us to restrict, erase or rectify it or to object to our processing it, and the right of data portability. |

## 5. COOKIES

The only cookies on our website are used for Google Analytics. Please see our cookie policy for further details.

## 6. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We may share your personal data within the Trident Energy Group. This will involve transferring your data outside the European Economic Area (EEA), but these group companies are expected to adhere to the same levels of data privacy as Trident Energy.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal



requirements.

Details of retention periods for different aspects of your personal data are set out in the table in paragraph 4 above.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- *Request access to your personal data.*

Commonly known as a “data subject access request”. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- *Request correction of your personal data.*

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- *Request erasure of your personal data.*

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- *Object to processing of your personal data.*

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- *Request restriction of processing your personal data.*

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- *Request transfer of your personal data.*

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- *Right to withdraw consent.*

Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.



#### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **10. GLOSSARY**

#### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to operate a safe and efficient oil and gas exploration and production business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us