



# FLINT SUBSEA LIMITED

## Privacy Policy

### 1 Introduction

As one of our customers, suppliers or someone else with whom Flint Subsea Limited (“FSL”) engage in business activities with, you understand and agree that we collect, use and disclose your personal information in accordance with this Privacy Policy (this “Policy”).

We use your personal information in order to fulfil our commitment to providing our products to you and with added services to improve your experience in connection with all of your interactions with Flint Subsea (the “Purpose”). As part of that undertaking, we are committed to safeguarding the privacy of the personal information that we gather.

### 2 The application of this policy

This policy applies to personal information regarding Companies, Suppliers and all other individuals with whom we engage in business activities with and to the use of that personal information in any form - whether oral, electronic or written.

This policy gives effect to our commitment to protect your personal information and has been adopted by all of the separate and distinct legal entities that manage, operate, franchise, license, own and/or provide services to the FSL.

References to “FSL”, “we” and “our” throughout this Policy, depending upon the context, collectively refer to the Flint Subsea Limited legal entity.

While this Policy is intended to describe the broadest range of our personal information processing activities globally, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws. For example, the laws of a particular country may limit the types of personal information we can collect or the manner in which we process that personal information. In those instances, we adjust our internal policies and/or practices to reflect the requirements of local law.

### 3 Types of personal information we collect

The term “personal information” in this policy refers to information that does or is capable of identifying you as an individual. The types of personal information that we process (which may vary by jurisdiction based on applicable law) include:

- your name, gender, personal and work contact details, date and place of birth, image/photos, nationality;
- your bank account details, and your account details such as customer reference number or customer ID and credentials;
- information, feedback or content you provide regarding your marketing preferences, or to our websites or apps and those of third parties;
- information collected whilst you access a website (we describe this in more detail in Sections 6 and 7 below).



Much of the personal information we process is information that you or someone acting on your behalf knowingly provides to us. However, in other instances, we process personal information that we are able to infer about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party. This Policy also applies to the personal information about you that we receive from a third party, unless specifically covered by such third party's privacy policy.

There may be very rare instances in which the personal information that you provide to us or that we collect is considered Sensitive Personal Information under the privacy laws of some countries. Those laws define "Sensitive Personal Information" to mean personal information from which we can determine or infer an individual's racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership in a trade union or professional association, physical or mental health or condition, medical treatment, genetic data, or judicial data (including information concerning the commission or alleged commission of a criminal offence). In some very rare instances, financial records may form part of Sensitive Personal Information where you are located. We only process Sensitive Personal Information in your jurisdiction if and to the extent permitted or required by applicable law.

When you agree to this policy you are, to the extent required under your local law, you are granting your express and written consent to the processing of any personal information that you provide to FSL that is considered to be Sensitive Personal Information or financial information. Save to the extent required by law, you are not obliged to provide FSL with any of your Sensitive Personal Information, and should you chose not to, this will not prevent you from purchasing any products or services from FSL.

#### **4 How we use personal information**

Subject to applicable laws, we may collect, use and disclose relevant portions of your personal information in order to:

- provide and charge for products and related services;
- provide you with a better or more personalised level of product, service, and/or experience including information and services from a third party (such as other products, or offers related to your preference for a given product);
- respond to requests for information and services, including services from a third party (such as a companies who make and transport products, provide services, and research product buyers);
- administer the FSL Marketing News and Product/Services Updates;
- fulfil contractual obligations to you, anyone involved in the process of making your access to products the best possible;
- conduct market research, customer satisfaction and quality assurance surveys, and direct marketing and sales promotions;
- provide for the safety and security of staff, or others;
- administer general record keeping;



- meet legal and regulatory requirements;
- test and evaluate new products and services.

FSL uses and retains your personal information for as long as is necessary to fulfil the purpose, however we will delete all data held where no business activity has taken place for 10-years.

## **5 Disclosures of your personal information**

From time to time, we may disclose your personal information. We would always make that disclosure in agreement with applicable law. In some jurisdictions, data privacy laws may require us to obtain your consent before we transfer your information from your originating country to other countries. When you agree to this policy, you are, to the extent required and permitted under your local law, granting your consent to the transfer of your personal information to such other countries for the Purpose and to the extent stated in this section and as described in Section 4 above.

Circumstances where we might make such disclosure (in addition to those described in Section 4 above) include:

### **5.1 Our agents, service providers and suppliers**

Like most Businesses, we may outsource the processing of certain functions and/or information to third parties. When we do outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information in accordance with the terms and conditions of this policy, with appropriate security measures.

### **5.2 Consumer insights**

Where we hold personal information about you, we may disclose this personal information to other companies that also hold information about you. These companies may combine the information in order to better understand your preferences and interests, thereby enabling them and us to serve you better. If your personal information is used for direct marketing purposes, you have the right to object to that by contacting us using the contact information provided under Section 10 below.

### **5.3 Business transfers**

In the unlikely event that we, or substantially all of our assets, are acquired, personal information collected about you, or control of such information, may be one of the transferred assets.

### **5.4 Legal requirements**

We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or lawfully requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting and tax rules and regulations and any specific record retention laws.

## **6 Information we collect when you visit us online**

If you access the FSL website, you may wish to know the following:

### **6.1 You can browse without revealing who you are**

You can always visit our websites without logging in or otherwise revealing who you are.



## **6.2 Usage information**

When you visit our websites, we collect information about how you use those websites. Examples of such information include the Internet Protocol address automatically assigned to your computer each time you browse the Internet, the date and time of your visit, the pages you access and the amount of time you spend on each page, the type of Internet browser you use, your device's operating system and the URL of any websites that you visited before and after visiting our website. That information is not linked to you as an individual unless you create a user profile, but we may keep records of the device being used.

## **6.3 Cookies and other similar technology**

We may use cookie technology on our websites to allow us to evaluate and improve the functionality of our websites. Cookies by themselves cannot be used to reveal your identity. They identify your browser, but not you, to our servers when you visit our websites. If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. However, if you block them, you may not be able to use all of the features of our websites.

## **6.4 Social media**

Our websites may also contain plug-ins and other features that integrate third party social media platforms into our websites. You will be able to activate them manually. If you do so, the third parties who operate these platforms may be able to identify you, they may be able to determine how you use this website and they may link and store this information with your social media profile. Please consult the data protection policies of these social media platforms to understand what they will be doing with your personal data. If you activate these plug-ins and other features, you will be doing so at your own risk.

## **6.5 Security**

Because the security of your personal information is important to us, the personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you so that you can take the appropriate actions for the due protection of your rights.

## **6.6 Minor children**

We do not sell products or services for purchase by children and we do not knowingly solicit or collect personal information from children. If you are under the age of 18 (or a minor in the jurisdiction in which you are accessing our websites), you may only use our websites with the involvement of a parent or guardian.

## **6.7 Targeted advertising**

This may include advertisements displayed on our own websites or apps, or advertisements from us displayed on other companies' websites. The advertisements you see may be based on information collected by us or third parties and/or may be based on your activities on our websites or third-party websites.



## **7 Choice**

You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected (for example, we cannot deliver a product without an address).

If you provide us with your contact details (e.g. postal address, email address, telephone number or fax number), we may contact you to let you know about the products, services, promotions and events offered that we think you may be interested in. We may also share your personal information with carefully-selected third parties, who may communicate directly with you. In some jurisdictions, data privacy laws may require us to obtain a separate consent before we do so. You can always choose whether or not to receive any or all of these communications by contacting us as described in Section 10 below or following the “unsubscribe” instructions contained in the communications.

In some jurisdictions, in addition to you agreeing to this Policy, data privacy laws may require us to obtain a separate consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g. where communications are required in order to fulfil your requests and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g. where the information collected is regarded to be Sensitive Personal Information under local regulations).

We will abide by any request from you not to send you direct marketing materials. When such a request is received, your contact details will be “suppressed” rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

## **8 Updating or Accessing Your Personal Information**

With some limited exceptions, you have rights to access and update personal information held about you. If you want to inquire about any personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out in Section 10 below. Please be sure to include your full name, address, and/or email address and phone number so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information we may require to make that determination.

You may request that we correct, cancel, and/or stop processing or using personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

## **9 Changes to this policy**

Just as our business changes constantly, this policy may also change. To assist you, this Policy has an effective date set out at the end of this document.

## **10 Request for access to personal information/questions or complaints**

According to applicable law, you have a right of access to a copy of the information comprised in your personal data; a right to object to processing that is likely to cause or is causing damage or distress;



A right to prevent processing for direct marketing; a right to object to decisions being taken by automated means; a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and a right to claim compensation for damages caused by a breach of the Data Protection Act.

If you have any questions about this Policy, about the processing of your data described, or any concerns or complaints with regard to the administration of the Policy, or if you would like to submit a request (in the manner described in Section 9 above) for access to or deletion of the personal information that we maintain about you, please contact us by any of the following means:

- by mail Flint Subsea Limited, Unit A8, Stanlaw Abbey, Dover Drive, Ellesmere Port, CH65 9BF, UK
- by contacting the front desk at Flint Subsea Limited +44 1244 886 090

If you are not satisfied with the response that you receive, you can escalate your concern to management who are responsible for Data Protection Compliance by sending an email to [info@flintsubsea.com](mailto:info@flintsubsea.com).

You may request that we correct, cancel, and/or stop processing or using personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

All requests for access to your personal information must be submitted in writing by letter to Senior Management (Data Compliance), Flint Subsea limited, Unit A8, Stanlaw Abbey Business Centre, Ellesmere Port, CH65 9BF. We may respond to your request by letter, email, telephone or any other suitable method.

Effective date: May 1, 2018

Revision	Date	Description	Author
1	01/05/2018	Initial Release	GB
2	22/10/2020	Address updated	GB
3	23/04/2021	Address updated / renumbered	GB