

# **Privacy Statement**

This Personal Data Privacy Statement explains what Personal Data Geoex MCG Limited collects from you, how we use the data, and how you may exercise your rights.

Geoex MCG Limited and its subsidiaries process Personal Data from external individuals, such as representatives of our customers, suppliers and business partners, and other persons who contact us, for example by participation at events or by newsletter signup.

Personal Data means any information relating to an identified or identifiable natural person ("Data Subject").

This Privacy Statement explains which Personal Data Geoex MCG collects from you, how we use the data and how you may exercise your rights pursuant to applicable data protection legislation.

#### **Contact Us**

If you have any questions or concerns about our collection of and processing of your Personal Data, please do not hesitate to contact Geoex MCG Limited by the following methods

E: info@geoexmcg.com

T: +44 (0) 1372 742 170

Geoex MCG Limited is to be regarded the Controller for the use of the data mentioned in this Privacy Statement.

### **Purpose and Legal Basis**

Geoex MCG collects data to operate effectively, optimize your experience of our products, prepare and deliver our services to our customers, receive services from our suppliers, collaborate with our business partners, and share information about our work and participation in events.

Personal Data we collect may be combined with data obtained from other services of Geoex MCG and other companies. Subject to the section below on 'Reasons We Share Personal Data', access to your Personal Data is strictly limited to Geoex MCG employees who have appropriate authorization and a clear business need for that data.

The legal basis for our collection and processing of Personal Data is the EU Regulation 2016/679 ("GDPR"). More specifically, we base our processing on Article 6.1

- (a) consent
- (b) necessary for the performance of a contract
- (f) necessary for the legitimate interests pursued by us, which are not overridden by the interests of you as a Data Subject.



#### **How We Use Personal Data**

This Privacy Statement tells you what to expect when Geoex MCG collects your Personal Data.

#### 1. Visitors to our Website

When someone visits www.geoexmcg.com we collect standard website traffic information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. Our processing of this information does not identify anyone.

Visitors to www.geoexmcg.com who seek information about our products or services, or submit other information to us, may be asked to provide Personal Data, typically email address, postal address, name, and how an email received from Geoex MCG is used by you. Further, the Personal Data we collect may also include company name, phone number, fax number, title, and department name.

#### 2. Customers

To provide our customers with the services they require from us, Geoex MCG collects and stores business-to-business contact information, such as name, company name, phone number, fax number, title and department name. We also store exchanged communication, preferences or feedback that is important to fulfil your order.

# 3. Suppliers and Business Partners

Geoex MCG stores business contact information, such as name, address, telephone and email, necessary to process invoices, payments or other commitments with suppliers, agents or other business partners. In connection with the selection process, we collect due diligence information, which may include company structure, credit checks, references, interviews and other background checks. We also conduct integrity due diligence checks to comply with applicable anti-bribery and corruption legislation. This process will in some instances include collecting and processing of Personal Data of directors, officers and contact persons such as name, nationality, residence, existing position, former positions, ownership participation, appointments, status as public official and CVs.

### 4. Recipients and Providers of Gifts and Entertainment

To abide by anti-corruption laws and regulations, Geoex MCG will generally collect the names of company representatives that have provided or received gifts and entertainment from Geoex MCG.

# 5. Applicants for Sponsorships

When individuals apply for sponsorship they submit their information in an application form, provide details of their proposal and an outline of the potential cost. Those who are awarded grants are asked to provide progress reports and expenses. Any Personal Data that is provided in the application and during sponsorship are used only for reviewing the sponsorship and the ongoing administration and management of any sponsorship awarded. We may also publish information about projects on our own website, including the amounts of the sponsorship awarded and the recipient of the grant.



# 6. Reporters of Compliance Telephone Cases

Individuals making contact via the Geoex MCG telephone line may choose to do so anonymously. If you wish to be identified, we will store your contact information together with the telephone report.

# 7. People who Email Us

We use Transport Layer Security (TLS) to encrypt and protect our office email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit. We also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

#### 8. Visitors to our Offices

Visitors to Geoex MCG are required to log their presence for security and administration reasons. We collect name, company name and telephone number.

#### 9. Candidates for Recruitment

We collect data necessary to assess the suitability of candidates for employment at Geoex MCG, such as personal contact details and ID, previous experience, education, and references. If you are shortlisted, we may further collect interviews, tests, and results of background checks. If Geoex MCG makes a final offer, we will also ask for other details needed to administer your employment with us such as bank details and emergency contact details.

### Reasons We Share Personal Data

From time to time, Geoex MCG enters into agreements with other companies to perform services to us, such as for operation and provision of systems, provision of customer support, hosting of websites, processing transactions or performing statistical analysis of our services. In these cases, we deem it necessary to share information. To the extent Personal Data is transferred to such external companies (acting as data processors), we will implement necessary security measures in accordance with applicable data protection legislation, e.g. by entering into data processor agreements.

Such service providers will only be permitted to obtain Personal Data to the extent necessary to provide their services to Geoex MCG. We will not disclose your Personal Data to any third parties for allowing them to market their products or services to you, and neither they nor we will sell or pass them to anyone other than Geoex MCG without your prior written permission.

Please note that our website may contain links to other, non-Geoex MCG websites. Geoex MCG is not responsible for the content of or the privacy practices of such other sites.



#### **Cookies**

Geoex MCG uses cookies (small text files placed on your device) to provide our website www.geoexmcg.com to help collect data. Cookies allow us, among other things, to store your preferences and settings; and analyse how our website is performing. Geoex MCG also uses cookies to ensure you get the best user experience. Our cookies do not contain information that can identify you. Geoex MCG gives an explicit notice when entering the website www.geoexmcg.com that we use cookies. You can set your browser not to accept cookies. However, in a few cases, some of our website features may not function as a result. Emails sent to you may also attach cookies, these are used to see how Geoex MCG best can optimize its service offering to you.

# **Data Security in Processing of Personal Data**

We will process your Personal Data in accordance with the requirements set forth in the applicable data privacy laws, including GDPR. Such processing will be done securely, and we will apply and maintain appropriate technical and organizational measures to protect your Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, where the processing involves the transmission of data over a network, and against all other unlawful forms of processing.

# **Duration of the Processing**

Personal Data is never retained for a longer period than is necessary for the purposes for which it was collected. We will either permanently anonymize it or in a secure manner delete Personal Data that we no longer need or are under an obligation to retain.

# Your Rights in Relation to your Personal Data

All Data Subjects in the EU/EEA whose Personal Data is processed by Geoex MCG within the scope of the GDPR and transferred to a Geoex MCG company outside of the EU/EEA have the following rights:

- 1. Withdraw consent: you have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us via e-mail (info@geoexmcg.com). If Geoex MCG's processing is based on your consent, you are entitled to at any time withdraw this consent. However, please note that if we are not provided with your consent to process your Personal Data we may not be able to deliver our services to you or receive services from you.
- 2. Access and information: to be granted access to your Personal Data and without undue delay receive (and as a rule no later than one (1) month from Geoex MCG's receipt of the request) in writing any information relating to your Personal Data in a concise, transparent, intelligible and easily accessible manner.
- 3. Rectification and restriction: to require without undue delay the rectification of any inaccurate Personal Data and restrict such data's usage.



- 4. Erasure: to require erasure without undue delay of Personal Data that it is no longer necessary to process in relation to the purposes for which they were collected or processed or where the consent is withdrawn
- 5. Portability: to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to transfer this to another controller without hindrance from Geoex MCG.
- 6. Complain: to lodge a complaint with a competent supervisory authority (in UK: Information Commissioners Office (www.ico.org.uk)

To help us keep your Personal Data updated, we advise you to inform us of any changes or discrepancies. To view and/or edit your Personal Data, or if you want information on how long we intend to retain your Personal Data or have any other questions about your right of access and how to use it, please contact the <u>Geoex MCG Global Data Protection Officer</u>.

# Personal Data Transfers Out of the EU/EEA

For Geoex MCG to be able to transfer Personal Data outside of the EU/EEA-area, Geoex MCG has adopted a set of Binding Corporate Rules ("BCR") as incorporated in the Geoex MCG Data Protection Policy. The BCR and the Geoex MCG Data Protection Policy includes a set of legally binding Processing rules which grants rights to certain Data Subjects.

Geoex MCG has also implemented standard data protection clauses adopted by the EU Commission, cf. GDPR Art 93(2) by entering into an intercompany agreement governing transfers outside of the EU/EEA-area within Geoex MCG Group.

Your Personal Information may be transferred outside of EU/EEA for storage and further processing, including to Canada and the United States. Data transfers may take place to process your data for the correct functioning of our business and to facilitate our departmental functions, whether that be via internal servers or using third-party cloud applications. We adhere to security protocols when handling, storing, and processing your data including, but not limited to, encryptions at rest and in transit, and end-to-end encryptions.

# **Choice of Law and Legal Venue**

Any dispute arising from your use of this website and/or our processing of your Personal Data shall be governed by and construed in accordance with the laws of Norway, and with the exclusive jurisdiction of the Oslo District Court.

# **Modification of our Privacy Statement**

This Privacy Statement was last updated 2<sup>nd</sup> December 2021. We reserve the right to modify the Privacy Statement from time to time and encourage you to familiarize yourself with the content of the Privacy Statement on a regular basis.