

Management System Policy and Procedure Module 4: Administration, Human Resources, and Training

Policy No. 4-1-12

Sub-module 4-1: Employment

Privacy Policy

Geoquip Marine Company Privacy Policy

Geoquip Marine Holding AG (including its subsidiaries in all countries) ("Geoquip Marine") is committed to the safety and security of your personal information and data. When you provide personal information to us, we have chosen to only use it in line with the EU General Data Protection Regulation 2018 and all other relevant data privacy laws. This privacy notice is to inform our customers how we process and look after your personal data. The data we collect is limited to information you provide to us that is necessary for entering in to a contract with us. We will always give you a choice in relation to how you prefer to be contacted by us, and you have a clear and simple option to withdraw your consent at any time.

It is important that you read this policy, together with any updates we may make on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Our core beliefs regarding your privacy and data protection:

- The customers within our data are covered by our duty of care.
- We use and protect your data in line with the EU 2018 General Data Protection Regulation.
- We dislike spam as much as you do!
- We will never make your personal information public, whether by selling or otherwise making available.
- We will only use your personal information in the line of our contract with you in order to improve our service to you.

Relevant legislation

Along with our computer systems, our business processes, our website (www.geoquip-marine.com) has been designed to comply with the following national and international legislation with regards to data protection and user privacy:

- EU General Data Protection Regulation 2018 (GDPR)
- Swiss Federal Act on Data Protection 1992 and Ordinance 1993
- UK Data Protection Act 1988 (DPA)

If you are not sure about whether our site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our Data Protection Officer for further information. Details can be found below.

Who we are:

Geoquip Marine is situated in Multergasse 1-3, 9000 Sankt Gallen in Switzerland.

How to contact us:

Telephone our head office: +41 71 227 4000 Send us an email on: info@geoquip-marine.com Writing to us at our registered office: As above



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Our Data Protection Officer is:

Johan Deschuyter Tel: +41 71 227 4000

Email: johan.deschuyter@geoquip-marine.com

Our Services:

We offer offshore geotechnical investigation surveys around the world.

We will comply with data protection law when it comes to the processing of your data. This says that the personal information we hold about you must be:

- 1) Used lawfully, fairly and in a transparent way.
- 2) Collected only to improve our services we have to render to you under our contract with you and that we have clearly explained to you and not be used in any way that is incompatible with those purposes.
- 3) Relevant to the purposes we have told you about and limited to those purposes.
- 4) Accurate and kept up to date.
- 5) Kept only as long as necessary for the purposes we have told you about.
- 6) Kept securely.

The categories of information we collect and hold about you:

We may collect, store and use the following categories of personal information about you:

- Personal contact details, such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Emergency contact numbers.
- Bank account details.
- Contract start date and end date.
- Copy of driving licence or Passport (if applicable)
- Copy of any HSE or other training certificates necessary for the execution of our services to you.
- Call recordings to and from the business if these would be introduced.
- National Insurance Number, Passport Numbers, Personal Identification Numbers....

How your personal information is collected:

We collect personal information about our customers either through an enquiry form, over the telephone, or in person.

Why we collect your personal data and our lawful basis for doing so:

Why?	Lawful Basis?
To allow us to perform our contract with you	Performance of a contract



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To enable us with our legal obligations Compliance with a legal obligation

To contact your emergency contact in the case of an emergency Protection of vital interests

To speak with a potential customer following a new enquiry Legitimate interest

Any personal data that we collect is used solely by Geoquip Marine. Data is only collected for the purpose of serving our customers and contacting them in relation to the contract they have entered, or the request for information they have made. Personal data is only processed for the purpose that it was originally collected. Before entering any personal information in to our online enquiry form, all customers are made aware of this privacy policy.

Third party data processors:

Geoquip Marine will never share any personal information with any third party that is not deemed essential by us for the provision of our services to you and the performance of our contract with you. Any third party processor that we do use is compliant with the GDPR, and has a trusted relationship with Geoquip Marine.

Contact forms and email links:

Should our customers choose to get in touch using the enquiry form on our website, none of the data that is supplied will be stored by our website. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). Our SMTP servers are protected by Transport Layer Security (TLS), meaning that the email content is encrypted before being sent across the internet. The email content is decrypted by our local computers and devices. Personal identifiable Information collected may include your name, email address and contact phone number. We may use your email address or phone number to contact you in response to your enquiry for any further information needed.

This is how Geoquip Marine will use your data:

The data we collect is used solely for the performance of the contract you have entered in to. We may check the personal information you give us against the records of several sources to confirm your identity. Geoquip Marine will never share your information for marketing purposes with any other company.

Below are some examples of the purposes for which we collect your data:

- For administering the contract we have entered into with you, including accounting and auditing.
- To confirm your identity, for the purpose of fraud prevention, counter terrorism and customer safety.
- To process payments for invoices relating to your contract with us.
- For statistical analysis.

How we use particularly sensitive information:

Geoquip Marine will only collect such information that is necessary to execute our duties to you under the contract we enter with you.



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Personal information about other individuals:

If you give us information on behalf of someone else as an authorised user or emergency contact, you confirm that the other person has agreed that you can:

- give consent on their behalf to the processing of their personal data; and
- receive on their behalf any data protection notices.

The data collected is limited to name, contact phone number and email address.

When will we contact any other person about you?

If you provide Geoquip Marine with details of an authorised user, we may contact that person to discuss and share the details of your account with that person and deal with that person in relation to your account as if that person was you. We may particularly want to do this if we are unable to get in touch with you for any reason or for emergency reasons. If you change your mind, you can email or write to us and have this person taken off your account as an authorised user. In the case of an emergency contact, we may contact them only if we are unable to get in touch with you for any reason. No personal information or details of your account will be revealed in this instance.

Change of Purpose:

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

How long we retain your data:

Geoquip Marine retains personal data for as long as necessary to provide our services, or for other essential purposes such as complying with our legal obligations and resolving disputes and enforcing our agreements. Actual periods of retention can vary significantly for different types of data, given the circumstances. If you have only enquired with us, your personal data will be retained for a period of no longer than 6 months.

How Geoquip Marine protects your information:

Your personal information is only filed on a secure server that we host offsite with a GDPR compliant company. The secure server software encrypts the information. In addition, we have strict security and confidentiality procedures covering the storage and disclosure of your information in order to safeguard it, to prevent unauthorised access and to comply with the General Data Protection Regulation 2018. Specifically, we shall permit only authorised employees, who are trained in the proper handling of personal information, to have access to that information. Employees who violate our Privacy Policy are subject to our usual disciplinary procedures.

Your rights:

Because the data we hold about you is your data, you have the following rights in respect of the personal data we hold about you:



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- 1) Right to be Informed Your right to be informed is carried out through this notice.
- 2) Right to Access This means that you can ask us for a copy of all personal data we hold about you. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. There will not be a charge for this request, unless requests are deemed excessive in nature.
- 3) Right to Rectification Given the nature of the information, it is commonplace that our customers contact details change during the length of a contract with us. if you believe that any of the information we hold about you is incorrect or out of date, you have the right/obligation to correct such information by providing us with the correct up to date information. In addition, you can ask us to delete the incorrect or out of date information and we will be happy to do so unless we are prevented from doing so by law or regulation.
- 4) Right to be Forgotten This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Please note that where we are obliged to keep your personal data because of a regulatory or legal requirement, we will not be able to delete such data and must continue to retain it.
- 5) Right to Restrict Processing In some limited circumstances you have the right to restrict the processing of your data.
- 6) Right of Objection You have the right to object to us using your data for direct marketing purposes and to profiling.
- 7) Right of Data Portability You have the right to request a copy of the personal data we hold about you in a commonly used and machine readable format. We can provide your data either to you or to a third party as you specify in your request.
- 8) Automated Decision Making Objection Right Automated decision making is where a decision is made entirely by technological means without human intervention. Geoquip Marine doesn't use or rely on automated decision-making system.

If you would like to exercise any of the above rights, please contact (preferably in writing) our Data Protection Officer using the contact details above.

Right to complain:

If you have any concerns about our handling of your personal data, you have the right to lodge a complaint with the relevant date protection authorities.

Changes to this privacy policy:

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This privacy policy was last updated in May 2020.