

# PRIVACY NOTICE

## 1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Superior Energy Services (“**Superior**”) is committed to protecting the privacy and security of individuals’ personal information, in compliance with applicable data privacy laws including the General Data Protection Regulation (“**GDPR**”) and legislation adopted to implement GDPR (as may be amended from time to time), and our Shared Core Values.

You may be transferring personal information to us and we may be processing such information, for the purposes of our customer / supplier relationship.

This Privacy Notice ensures that you are aware of the legitimate interests being pursued by Superior when such personal information is collected and processed. It provides information on the type of personal information we collect and use, and the lawful basis for its processing and retention. It also provides information on how we manage personal data security, data sharing within our organisation and/or to third parties, international transfers of personal data, and explains individuals’ rights as data subjects and how those rights can be exercised.

We may update this notice at any time.

## 2. THE KIND OF INFORMATION WE HOLD

We will collect, store, and use the following categories of personal data belonging to individual representatives of current, former and prospective customers and suppliers, including visitors to Superior premises or events hosted by Superior (“**Data Subjects**”):

- full name;
- title;
- role;
- department;
- employing company
- work contact details (telephone, mobile phone, email address, postal address and other business card information);
- personal contact details (telephone, mobile phone, email address);
- contact preferences;
- interests / marketing preferences;
- professional opinions and judgements;
- log-in details for user accounts (if any);
- passport numbers or other forms of identification (in the context of site / asset visits); and
- religion (in the context of dietary requirements for events).

Data Subjects’ personal information is referred to as “**Personally Identifiable Information**” or “**PII**” throughout this Privacy Notice.

### **3. HOW IS PERSONALLY IDENTIFIABLE INFORMATION COLLECTED?**

We collect PII either directly from the Data Subject, from our customer or supplier organisation and sometimes from an introduction via a third party, in the course of our business relationship and work related activities. We may sometimes collect additional information from third parties in the context of compliance due diligence and background checks.

### **4. HOW WE WILL USE PII**

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

- For work and social communications pursuant to the customer / supplier relationship.
- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- 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.

We may also use PII in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

#### **Change of purpose**

We will only use PII 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 we need to use such personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so and/or request your explicit consent.

### **5. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We typically do not collect sensitive personal information categorised as special data under GDPR, such as political opinions, religion or other beliefs, biometrics or genetic characteristics, and ask that no sensitive information is provided to Superior unless absolutely necessary. In the limited situations where we collect and process sensitive personal information, we do so for the legitimate interests of the business, in accordance with our Data Protection Policy, or to carry out our legal obligation. In all cases, we undertake to satisfy the legal and regulatory requirements to which we are subject.

### **6. AUTOMATED DECISION-MAKING**

We do not envisage that any decisions will be taken about Data Subjects using automated means, however we will notify you in writing if this position changes.

### **7. DATA SHARING**

We may have to share PII with third parties, including (but not limited to) other customers, suppliers and/or entities within the Superior group, pursuant to our contract, business relationship or work-

related activity, where required by law or where we have another legitimate interest in doing so. We require third parties to respect the security of this data and to treat it in accordance with the law.

#### **How secure is PII with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the Superior group are required to take appropriate security measures to protect PII in line with our policies. We do not allow our third-party service providers to use PII for their own purposes. We only permit them to process PII specified purposes and in accordance with our instructions.

#### **Transferring information outside the European Economic Area (“EEA”)**

We may transfer the PII we collect to countries outside the EEA, including the United States of America, in order to perform our contract with you.

In addition to any adequacy decision taken by the European Commission in respect of that country or countries where your data is transferred, and to ensure that PII does receive an adequate level of protection, Superior has put in place an Inter-Group Data Transfer Agreement containing standard contractual clauses approved by the European Commission as providing an adequate level of data protection where data is transferred outside of the EEA for legitimate purposes within the Superior group.

We ensure that PII is treated by any third parties outside the EEA in a way that is consistent with and which respects the GDPR. We have a contract in place with each service provider to govern our requirements and enforce the appropriate limitations and security measures.

### **8. DATA SECURITY**

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

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

### **9. DATA RETENTION**

We will retain PII for as long as it is needed or permitted in light of the purpose(s) for which it was collected.

Examples of the criteria used by Superior to determine how long information is held include consideration of legal, accounting, or reporting requirements such as applicable statutes of limitation, regulatory investigations and/or litigation.

## 10. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### Your duty to inform us of changes

It is important that the PII we hold is accurate and current. Please keep us informed if the PII changes during our business relationship.

### Rights in connection with personal information

Under certain circumstances, by law Data Subjects have the right to:

- **Request access** commonly known as a “data subject access request”. This enables you to receive a copy of the PII we hold.
- **Request correction.** This enables you to have any incomplete or inaccurate information we hold duly corrected.
- **Request erasure.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it or where you have exercised your right to object to processing.
- **Object to processing.** Where we are relying on a legitimate interest (or those of a third party) and there is something which makes you want to object to processing on this ground.
- **Request the restriction of processing.** This allows you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of personal information to another party when the information is stored and processed automatically.**

If you want to exercise any of the above rights, please contact the Data Protection Task Force at [dataprotection@superiorenergy.com](mailto:dataprotection@superiorenergy.com) in writing or access the requests forms on Superior’s website.

### No fee usually required

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

### What we may need from you

We may need to request specific information to help us confirm your identity and ensure your right to access the information (or to exercise any of the other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **11. RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided explicit consent to the collection, processing and transfer of personal information for a specific purpose, you have the right to withdraw consent for that specific processing at any time.

To withdraw consent, please contact the Data Protection Task Force at [dataprotection@superiorenergy.com](mailto:dataprotection@superiorenergy.com)

## **12. DATA PROTECTION OFFICER/COMPLIANCE MANAGER**

We have appointed representatives from Superior's Legal/Compliance, HR and IT departments to a Data Protection Taskforce to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or how we handle personal information, please contact the Data Protection Task Force at [dataprotection@superiorenergy.com](mailto:dataprotection@superiorenergy.com)

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.

## **13. CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice 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.

## **14. INTERFACE WITH EXISTING AGREEMENTS**

This Privacy Notice is in addition to and supplements Superior's obligations in respect of PII contained in any existing contract between you and Superior ("**Contract**"). However, for the avoidance of doubt, nothing in this Privacy Notice shall alter, derogate from or affect in any way, the allocation and extent of liability relative to a data protection breach set out in any Contract.

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## **ACKNOWLEDGEMENT**

If we do not receive any communication from you regarding this Privacy Notice within 30 days of receipt, we will consider this notice to be received and understood without objection.

We greatly appreciate your assistance with this important compliance matter.