

PRIVACY NOTICE

We take your privacy seriously

Premier Oilfield Group LLC (“Premier”) is committed to safeguarding the privacy of personal information entrusted to us. The privacy principles and procedures set forth below are intended to tell you how we collect and use personal information received from you either via our primary public website (www.pofg.com), or other websites operated by Premier (“Website”).

This Privacy Notice (“Notice”) also covers personal information collected by Premier from sources other than the Website such as by phone, e-mail, SMS or through social media (Facebook, LinkedIn, Twitter, Instagram, and other similar channels) or from third parties.

This Notice provides information about how we will use and otherwise process information capable of identifying individuals (“Personal Data”) including current, past, and prospective clients, customers and suppliers.

This Notice, together with our Website Terms of Use and any other documents that we may provide about a particular use of Personal Data, sets out the basis on which we will process any Personal Data Premier collects or receives about you. If there is any conflict between our Website Terms of Use and this Notice, the provisions of this Notice will prevail.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) (“GDPR”) is a new regulation that replaces the Data Protection Directive (Directive 95/46/EC). GDPR aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Your rights under GDPR as they pertain to our business are set out in this Notice and apply from 25 May 2018.

Please read the Notice carefully to understand our views and practices regarding your Personal Data. Where we refer in this Notice to “processing” Personal Data, we mean any operation we perform on it, such as collecting, organising, storing, updating, using, disclosing and erasing it.

Who we are and How to Contact Us

For the purposes of data protection legislation, the Data Controllers are the relevant subsidiaries within the Premier Oilfield Group. These include Corex UK Ltd, a UK registered Company Registration No.2973383, (“Corex”). Where we refer in this Notice to Premier, we mean Corex and all other companies in the Premier Oilfield Group.

Premier’s nominated GDPR Implementation Officer is our UK IT Administrator who can be contacted at gdpr@pofg.com if you have any questions or concerns about our processing of your Personal Data.

Purposes of our Collection, Use and Processing of Personal Data

Premier offers a range of products and services (the “Services”) to the oil & gas industry and operates around the world and through a number of offices and websites. In general Premier collects the Personal Data of people in the following categories in the course of and for the purposes of offering and delivering Services:

- Individuals who are or are employed or engaged by active and prospective clients
- Supplier contacts to support our Services
- Premier [employees,] consultants, contractors and their personnel.
- Prospective [and placed] candidates for permanent or temporary roles

We collect and process your Personal Data when you or a third party knowingly provides it to us, such as your:

- Name
- Job Title
- Postal address (including billing and shipping addresses)
- Country of operation (may be different than office location)
- Telephone number
- Email address
- Company name and type of business
- Affiliation:
 - a. Customer
 - b. Student
 - c. Job seeker
 - d. Vendor or supplier
 - e. Investor or financial analyst
 - f. Teacher, professor, or academic researcher
 - g. Other

We may need to collect and process these types of Personal Data in order to provide the Services to you, or because we are legally required to do so or for any of the following purposes

- To contact you:
 - To respond to your inquiries and fulfil your requests. For example, to confirm your attendance at an event we organize.
 - To send administrative information to you, for example, information regarding the Services and changes to our terms, conditions and policies.
 - To interact with you via social media.
 - To process an application for employment including checking references and verifying your qualifications and experience and your right to work in a particular jurisdiction, curriculum vitae (or career profile), photograph, and other data that may be available in the public domain e.g. LinkedIn, Twitter, business Facebook, or on a corporate website.
- To execute any agreement(s) we may enter into with you.
- To tailor our Website in a way that is most relevant to you based on your preferences (e.g. information you have voluntarily provided to us, or your previous visits to our Website).
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- For assessment and acceptance of a customer.
- To inform you about our products and services, including by direct marketing;

- Operate, evaluate and improve our business and Services;
- Maintain network security, protect against, identify, investigate, and respond to fraud, illegal activity, claims and other liabilities;
- For our internal administration;
- For our proposed corporate activities, such as a sale or merger.
- To operate a database of client personal data containing historical information as well as current resourcing requirements.
- To record the personal data of prospective client contacts.

If you are working for Premier as an employee, a consultant or contractor, we may also collect and process additional Personal Data that you knowingly provide to us, such as:

- Identification numbers such as passports, driver's licences, National Insurance or Social Security for yourself or your spouse or dependents
- Your spouse's or dependents' personal information
- Other information required to satisfy regulatory and benefit program sign-up requirements
- Background information as part of a pre-hire background check.

Information Premier collects about you when you visit our Website

When you visit our Website, Premier may also automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, operating system and platform.
- Information about your visit, including the full Uniform Resource Locators (URL) of each page visited, clickstream to and through our Website including date and time, subjects visited and searched for, download errors, length of visits to pages, and any information submitted through forms.
- Cookies: our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a beneficial experience when you browse our Website and also allows us to improve our Website. By using our Website, you are agreeing to the use of cookies as described.

Premier does not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

Information Premier obtains from other sources

This is information Premier obtains about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and social media sites. Premier will (unless you already have the information or providing it is impossible or would provide disproportionate effort or would breach an obligation of professional secrecy) inform you, by sending you this Notice, within a maximum of 30 days of collecting any such data, of the fact that Premier is holding such personal data about you, the source from which the personal data was obtained, whether it came from a publicly accessible source, and for what purposes we intend to retain and process your Personal Data.

We work closely with third parties, including business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search

information providers, credit reference agencies, and professional advisors. We may receive information about you from them for the purposes of providing services and ancillary support services.

Legal basis for the processing of Personal Data

Our legal basis for the processing of Personal Information is usually our legitimate business interest, as described above, where this does not override your interests, fundamental rights or freedoms. Depending on the precise purpose, the other legal bases for processing your Personal Data which Premier relies on are contract, legal obligation, and consent for specific uses of data, as detailed below:

- Premier will rely on any existing contract if Premier is negotiating or has entered into a placement agreement with you or your organisation or any other contract to provide Services to you or receive services from you or your organisation.
- Premier will rely on legal obligation if Premier is legally required to process information about you to fulfil our legal obligations, such as verifying identity, complying with AML and anti-bribery laws and preventing fraud and as set out below under the heading “Other uses and disclosures”.
- Premier will in some circumstances rely on your consent for particular uses of your data and you will be asked for your express consent, if legally required, e.g. obtaining your permission to introduce you to a client as a reference.

We will also ensure to the best of our ability that other businesses with which we work who process your Personal Data for us are just as careful with your data as we are. We will request that any Personal Data we pass to such a third party during any business process is deleted by the recipient at the end of that process, unless such information must be retained by the third party to satisfy a legal, accounting, regulatory or reporting requirement.

Consent

Should Premier want or need to rely on your consent to lawfully process your data, we will request your consent orally, by email, by SMS or by asking you to complete an online process for the specific activity requiring such consent (e.g. when registering an interest in our Services or when you apply for a job) and to record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Disclosure of your information inside and outside of the EEA

Premier will share your Personal Data with selected third parties, including:

- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract Premier enters into with them or you
- Subcontractors including payment and other financial service providers
- Service providers that make use of your Personal Data to display our adverts to an appropriately targeted audience
- Analytics and search engine providers that assist us in the improvement and optimisation of our Website
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability where this is a condition of us entering into a contract with you.
- When Premier sells or buys any business or assets, in which case Premier may disclose your Personal Data to the prospective seller or buyer of such business or assets

- If Premier is acquired, or substantially all of its assets are acquired, by a third party, in which case Personal Data held by it about its staff and customers will be one of the transferred assets
- If Premier is under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or to enforce or apply our Website Terms of Use and other such agreements; or to protect the rights, property, or safety of Premier, its customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Other uses and disclosures

Premier may use or disclose Personal Data as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions or in response to activities that are unlawful or a violation of Premier rules for use of the Website; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Where Premier Oilfield Group stores and process your Personal Data

The data that Premier collects from you may be transferred to, and stored at, a destination outside the European Union ("EU"). It may be transferred to third parties outside of the EU for the purpose of our business services. It may also be processed by staff operating outside the EU who work for us or for one of our suppliers. This may include staff engaged in, among other things, recruitment and the provision of support services. Premier will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Notice. Many countries outside the EU do not have the same data protection laws as the EU. On occasion, such transfer is necessary to perform a contract. In other cases, we will ensure at least one of the following safeguards is implemented:

- we will only transfer the Personal Data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- where we transfer the data to third parties, we will use specific contracts between us and the recipient in a form approved by the European Commission; or
- where the transfer is to the USA, the recipient is within the EU-US Privacy Shield; or
- where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

If you would like a copy of a relevant safeguard, please contact us using the contact details set out above.

All information you provide to us is stored on a secure server. Where Premier has given you (or where you have chosen) a password that enables you to access certain parts of our Website, you are responsible for keeping this password confidential. Premier asks you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although Premier will do its best to protect your Personal Data, Premier cannot guarantee the security of your data transmitted to our Website. Any such transmission is at your own risk. Once Premier has received

your information, Premier will follow strict procedures and deploy security features to try to prevent unauthorised access.

Retention of your data

Premier will retain your Personal Data for no longer than necessary in order to (i) provide our Services to you, (ii) fulfil the purpose(s) for which the Personal Data was obtained, and (iii) satisfy any legal, accounting, regulatory or reporting requirements.

Premier segregates data so that we retain different types of data for different time periods. The criteria used to determine our retention periods include: (i) the nature of the Personal Data and its perceived accuracy; (ii) the length of time we have an ongoing relationship with you; (iii) whether there is a legal obligation to which we are subject; or (iv) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations). Based on the above, our policy is to retain Personal Data about you if we have had no contact with you for more than two (2) years save where it relates to transactions or financial data in which case we retain it for seven (7) years or where it includes health and safety information where we will retain it for forty (40) years.

Premier will take the following steps to try to ensure the data we retain is accurate:

- Prior to making a data entry, Premier will check that we have accurate information about you.
- We will maintain contact with you so that you can inform us of changes to your Personal Data.

We will make use of external websites (e.g. LinkedIn) to verify the information we have retained about you.

Premier may archive part or all of your Personal Data, retain it only in our financial systems, or delete all or part of it from our systems. We may use pseudonyms for parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your Personal Data into our database, unless requested to do so.

The GDPR provides you with the following rights

You have the right to obtain confirmation as to whether we process your Personal Data and to access a copy of your Personal Data which we process. If you would like to request access to your Personal Data, you may contact us by sending inquiries to the Contact Information below. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

You have the right to ask us not to process your Personal Data for marketing purposes. Premier will usually inform you (before collecting your data) if we intend to use your data for such purposes or if Premier intends to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your Personal Data for marketing purposes.

You also have the right to:

- Request correction of the personal information that Premier holds about you. This enables you to have any incomplete or inaccurate information holds about you corrected
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below)

- Object to processing of your personal information where Premier is relying on a legitimate interest (or that of a third party) but there is something about your particular situation that makes you want to object to processing on specific grounds. You also have the right to object when Premier is processing your personal information for direct marketing purposes
- Request the restriction of processing of your personal information. This enables 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 it being processed
- in any specific case where we have obtained your consent for the purposes of the processing, the right to withdraw such consent, without affecting the lawfulness of processing before such withdrawal
- Request the transfer of your personal information to another party in certain formats, if practicable
- Make a complaint to a supervisory body, which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase or promotion).

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Premier does not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

Changes to our Notice

Any changes Premier may make to our Notice will be posted on this page and, where appropriate, sent to you by e-mail. Please check back frequently to see any updates or changes to our Notice.

Contact

Questions, comments and requests regarding this Notice are welcomed and should be addressed to The GDPR Implementation Officer, Premier Oilfield Group (Corex UK Ltd), Units B1-B3, Howe Moss Drive, Aberdeen, AB21 0G or GDPR@pofg.com