ELDORADO DRILLING LIMITED

PRIVACY POLICY

1.0 Purpose of Privacy Policy

1.1. This Privacy Policy explains our approach to any personal information that we collect from you and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information.

1.2. This Privacy Policy will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

1.3. This Privacy Policy is intended to assist you in making informed decisions and to understand how your personal information may be processed by us. Please take a moment to read and understand this policy.

1.4. This Privacy Policy applies to all current and former employees, workers, contractors and candidates.

1.5. Eldorado Drilling Limited ("Eldorado") is a data controller which means we are responsible for deciding how we hold and use personal information about you.

1.6. It is important that you read and retain this notice, together with any other privacy notice we may provide 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 information and what your rights are.

2.0 Information we may collect about you

2.1 Name, gender, date of birth (excluding US), marital status, nationality and employee identification number.

2.2 Contact information including home address, email address, phone number.

2.3 Recruitment information including copies of right to work documentation, references, CV/Resume including your education and employment history.

2.4 Passport/ Immigration Documents.

2.5 Residency and work permit status, military status, nationality and passport information.

2.6 Social security or other taxpayer/government identification number.

2.7 Payroll information, banking details.

2.8 Wage and benefit information.

2.9 Employment records including job titles, work history, working hours, holidays, training records and performance, disciplinary and grievance information.

2.10 CCTV footage and other information obtained throughout electronic means such as swipe cards.

2.11 Photographs.

2.12 Beneficiary and emergency contact information.

2.13 Professional certifications and registrations.

2.14 Other information relevant to potential recruitment/employment with Eldorado.

2.15 We may also collect, store and use the following more sensitive types of personal information:

- 2.15.1 Health Data, including information about your sickness absence records;
- 2.15.2 Information about your race or ethnicity; and/or
- 2.15.3 Information about criminal convictions and offences.

3.0 How do we use your personal information

3.1 We will only use your personal information when the law allows us to do so and most commonly in the following circumstance:

- 3.1.1 Where we need to perform the contract we have entered into with you.
- 3.1.2 Where we need to comply with a legal obligation.

3.1.3 Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

3.2 In respect of your sensitive personal information as listed above we may process your sensitive personal data in the following circumstances:

3.2.1 In limited circumstances, with your explicit consent;

3.2.2 Where we need to carry out our legal obligations or exercise rights in connection with employment; and/or

3.2.3 Where it is needed in the public interest, such as for equal opportunities monitoring.

3.3 Less commonly we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

3.4 We may also use your personal information in the following situations, which are likely to be rare:

3.4.1 Where we need to protect your interests (or someone else's interests).

3.4.2 Where it is needed in the public interest or for an official purpose.

4.0 Situations in which we will use your personal information

4.1 Recruitment

4.1.1 To assess your suitability for any position for which you may apply at Eldorado whether such application has been received by us online or via email.

4.1.2 To review Eldorado's equal opportunity profile in accordance with applicable legislation to ensure that Eldorado does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

4.1.3 For the purposes of recruitment, personal data regarding health data may be processed only as strictly required and as permitted or required by local law for the purposes of making adjustments to the recruitment process, for assessing eligibility for positions and fitness to work and provision of facilities in the workplace to accommodate health problems.

4.2 Employees

4.2.1 To manage all aspects of an employee's employment relationship, including, but not limited to the establishment, maintenance, and termination of employment relationships. Examples of activities related to this include: pay and benefit administration; corporate travel and other reimbursable expenses; development and training; absence monitoring; employee communications; performance evaluation; disciplinary actions; grievance and internal investigation activities; competency; succession planning; relocation assistance; obtaining and maintaining insurance and other general operations, administrative, financial, and human resources related purposes.

4.2.2 Assisting you with obtaining an immigration visa or work permit where required.

4.2.3 For use in marketing and safety videos.

4.2.4 Maintain directories of employees.

4.2.5 To protect the safety and security of our workforce, guests, property, and assets.

4.2.6 To investigate and respond to claims against us.

4.2.7 To maintain emergency contact and beneficiary details.

4.2.8 To comply with applicable laws (e.g. health and safety, employment laws, office of foreign asset controls regulations, tax laws), including judicial or administrative orders regarding individual employees.

4.2.9 Carry out other purposes as part of our business activities when reasonably required by us such as, but not limited to, submission of your CV/Resume to clients under tenders or drilling contracts to substantiate your experience in working on a drilling rig.

5.0 What is our legal basis?

5.1 Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Eldorado. We will not process any special category data except where we are able to do so under applicable legislation or with your explicit consent.

5.2 It is our obligation to use your personal information to comply with any legal obligations imposed upon us. 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 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.

6.0 If you fail to provide personal information

6.1. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workforce).

7.0 Why and who do we share your personal information with

7.1 To facilitate our efficient use of your information, to enable us to administer the working relationship with you and to provide you with the content and/or resources, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

7.1.1 To clients and agents: we may engage or employ other companies and individuals to perform functions on our behalf such as payroll, pension administration, benefits provision and administration and IT Services Such recipients will only have access to your personal information as required by them to perform their functions, and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual obligations relating to confidentiality and security and will only be able to use your personal information for the specified purposes you have provided the information to us for and in accordance with our instructions;

7.1.2 To other entities belonging to Eldorado;

7.1.3 To government or law enforcement authorities if we determine in our sole discretion that we are under a legal obligation to do so; and/or

7.1.4 Other third parties in the context of the possible sale or restructuring of the business.

8.0 Where we store your personal data

8.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by agents operating outside the EEA who work for us or for one of our business partners.

8.2 By submitting your personal data and/or accepting the employment offer you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and the law.

9.0 How long do we hold your personal data for?

9.1 We hold personal data of unsuccessful Applicants for no longer than one year after the recruitment process to ensure compliance with local legal requirements.

9.2 In all cases information may be held for:

9.2.1 a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose); and/or

9.2.2 a shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate purpose to retain it.

9.3 If you are successful in your application, the personal data will be retained in line with the local law regulations, only for as long as we believe it is necessary to fulfill the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

10.0 Your rights and access to information

10.1 We aim to keep our information about you as accurate as possible. It is important that you keep us advised of any changes to your personal information during your working relationship with us.

10.1.1 You have right to:

10.1.2 Access and obtain a copy of your personal information once per annum, more frequent requests may require a charge to you.

10.1.3 Correct your personal information.

10.1.4 Be forgotten/have data deleted (only where it is not required for a legitimate business purpose).

10.1.5 Object to the processing of your personal information where we are relying on a legitimate interest and there is something about your situation which makes you want to object to processing on this ground.

10.1.6 Request the restriction of processing of your personal information. This enables you to suspend the processing of personal information about you e.g. if you want us to establish its accuracy or the reason for processing it.

10.1.7 Request the transfer of personal information to another party.

10.1.8 In limited circumstances where you have provided our consent to processing for a specific purpose you have the right to withdraw your consent.

10.2 If you wish to take any of the above steps or have any questions about this privacy notice or how we handle your personal information please contact: dataprotection@eldoradodrilling.com

11.0 Changes to our privacy policy

11.1 We may make changes to this Privacy Policy to ensure that you are always aware of how we use your personal information. Please check back frequently to see any updates or changes to our privacy policy.