SHEARWATER PRIVACY POLICY

HOW TO CONTACT US
Questions, comments, and requests regarding this Privacy Policy should be addressed via email at privacy@shearwatergeo.com or regular mail at:

Shearwater GeoServices Holdings AS
Legal Department
Damsgårdsveien 135
5160 Laksevåg
Bergen
Norway

Shearwater GeoServices Holdings AS (“Shearwater”) and its affiliates are committed to protecting your information. Please read this Privacy Policy (“Policy”) carefully as it sets out important information relating to how we handle your personal information.

SHEARWATER COMPANIES ISSUING THE POLICY
In this Policy, references to "we," "us," or "Shearwater" are references to Shearwater GeoServices Holdings AS and all its group companies doing business under the Shearwater name.

Shearwater and all its group companies will have access to information on individuals covered by this Policy.

INTRODUCTION
This Policy sets out how we collect and use personal information and your choices and rights regarding our use of your personal information.

This Policy describes our practices when using your information when you:

- Express an interest in or have signed up for our conferences or services/products including newsletters, press releases, software trials, user group meetings, careers, webinars and brochures, or activate/use any Shearwater account and/or license.
- Attend a Shearwater conference or stand at conference/trade show.
- Visit our websites (including our public and/or member-based websites):
  - www.shearwatergeo.com
  - reveal.shearwatergeo.com
  - clientfeedback.shearwatergeo.com
  - supervision.shearwatergeo.com

This Policy also applies to information we collect from you via a survey or client feedback tools as outlined in more detail below. You may be shown an additional confidentiality notice before participating in a survey or client feedback report. Please note that in cases where the
terms of any such survey or diagnostic specific confidentiality notice conflict with any terms in this Policy, the terms of that notice will take precedence over the terms in this Policy.

This Policy will apply whether you have provided the information directly to us or we have obtained it from a different source, such as a third-party.

A list of the third-party platforms used by Shearwater and its group companies:
- Vimeo
- Pardot
- Google Analytics
- Facebook
- ADRoll
- IPTrack
- Zendesk
- LinkedIn

1. INFORMATION THAT WE COLLECT ABOUT YOU

Data collection and use
Information you provide when posting content on social media sites.
- Facebook
- Instagram
- LinkedIn

We use this information for certain activities, including:
- Facilitating the business through communication with corporate clients and other business contacts for example, to communicate about vendor briefings or details of conferences or webinars.
- For internal analysis and research to help us improve our services.
- To send marketing to business contacts regarding our services and products which may be of interest and to promote our business and brand.
- Administering our website, investigating any complaints, and providing customer service.
- Monitoring social media content to manage relations with our clients and promote our business and brand.

We use this information because:
- It is necessary to perform our obligations or exercise our contractual rights.
- It is necessary to comply with applicable laws or regulations.
- Shearwater GeoServices AS is a global company, with its Headquarter in Norway, and must comply with EU legislation (e.g., GDPR). We have a legitimate business interest to:

Manage and promote our business and brand;
Provide and improve our services; and
Operate our business.
1.1 INFORMATION WE COLLECT WHEN YOU ATTEND ONE OF OUR CLIENT EVENTS (SEMINARS/CONFERENCES/USER GROUP MEETINGS/EXHIBITION STANDS):

Categories of information we collect about you include:

- Information you provide during registration, such as name, business email address, profile photograph, job title, professional interests and requested accommodation.
- Pictures and video of the event.

We use this information for certain activities, including:

- Enabling you to attend our client events.
- Conducting our client events.
- Analysing attendee interests in and interactions with the client event.
- Marketing our client events using video and images.
- Providing recordings of certain conference sessions to interested business contacts, attendees and online through our website or Shearwater social media sites.

We use this information because:

- It is necessary to perform our obligations or exercise our contractual rights.
- It is necessary to comply with applicable laws or regulations.

We have a legitimate business interest to:

- Manage and promote our business and brand.
- Operate our client events.
- Provide and improve our services.
- Collect relevant information for hospitality and health and safety purposes.

1.2. INFORMATION WE COLLECT FROM USERS OF OUR PUBLIC AND MEMBER-BASED WEBSITES

Categories of information we collect about you include:

- Information you provide when you enter information on our website, such as when you provide contact details, answer online questionnaires, or feedback forms.
- IP Address, Web Browser software, Date, Duration of your visit and tracking of your activities on our websites.
- Information you provide when you subscribe to email newsletters such as name, email address and job title.
- Information you provide when registering for an online or member account, including name, business or personal email address, job title, organisation, organisation’s physical address, direct telephone number, photograph and biographical details.
- Where you have an online or member account, log in credentials and information about your use of and preferences for these services.
We use this information for certain activities, including:
- Enabling you to access your Shearwater information and projects.
- Personalising your experience of our website, extension and apps.
- Administering our website, extension, and apps.
- Providing more customised client service, including follow up contact from sales.
- Investigating complaints.

We use this information because:
- It is necessary to perform our obligations or exercise our contractual rights.
- It is necessary to comply with applicable laws or regulations.

We have a legitimate business interest to:
- Promote our brand and business through our website and through social media tools;
- Monitor, investigate and report any attempts to breach the security of our website;
- Provide and improve our services and products;
- Operate our business;
- We have your consent (where required under applicable law) to use your information for marketing. Where we rely on your consent, you have the right to withdraw consent by contacting us.

1.3. INFORMATION WE COLLECT DIRECTLY FROM THIRD PARTY OR FROM PUBLIC SOURCES

Categories of information we collect about you include:
- Name, title, email addresses and phone numbers.
- We use this information for certain activities, including:
  - Marketing and sales.

We use this information to:
- Promote our brand and business.
- We have a legitimate business interest to:
  - Manage and promote our business and brand.

1.4. SPECIAL CATEGORIES OF INFORMATION
Certain types of personal information are more sensitive than others. This includes information about health, disability, race, ethnicity, criminal offences (or alleged offences), political opinions, biometric information or religion. It is voluntary for you to disclose this information, but where we collect and receive these types of information about you, we have identified the type of special information, how we will use it and why we will use it.

Categories of information we collect about you include:
- Dietary requirements that may imply specific religious beliefs or medical conditions.
- Any physical or mental disability or impairment you may disclose to us.
We use this information for certain activities, including:
Providing hospitality that is suitable for attendees of our conferences.

We use this information because:
You have consented by providing us with the information. Where we rely on your consent, you have the right to withdraw your consent by contacting us.

1.5. FURTHER INFORMATION
Where we collect and use information for our legitimate interests as mentioned above. A legitimate interest will only apply when we consider that your interests or rights requiring protection of your personal information do not override our legitimate interests. For more information regarding our legitimate interests as applied to your personal information, please contact us.

In certain circumstances, if you do not provide personal information which is required (for example, in relation to activating your Shearwater license), we will not be able to perform our contractual obligations or provide you with products and services. When this is the case, we will make it clear.

Recorded Communications with Shearwater
We may ask to record calls for training, quality, and research purposes. All recordings will be treated as confidential. If you do not want us to record your call, you will be given a chance to opt out. If your call is already in progress, you may ask us to turn off the recording at the start of the call.

Communication with Colleagues
We may, while fulfilling our legitimate business interests, communicate with you or your colleagues. Please be aware that your name and email address may be included in the communication sent to your colleague(s).

Third Party
Shearwater websites rely on several tools managed by third parties.

A complete list of the third parties we are using, the information gathered, and the privacy policies attached to those providers is available here:

- Vimeo
- Pardot
- Google Analytics
- Facebook
- AdRoll
- IPTrack
- Zendesk
- LinkedIn
2. WHEN WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information to third parties as follows:

- To Shearwater group companies to process the data for the above-mentioned purposes.
- When we have your consent to do so, e.g., when you or your company have requested a service that involves third parties.
- To third parties who work on our behalf to service or maintain business contact databases and other IT systems, e.g., suppliers of the IT systems which we use to process personal information, or who provide other technical services, such as printing.
- To third parties providing services to us or on our behalf who have a need to access your information, e.g., our professional advisors (e.g., auditors and lawyers) or venues for our conferences.
- To comply with applicable laws, protect rights, safety and property, and respond to lawful requests from public authorities (e.g., disclosing data in appropriate situations for national security or law enforcement purposes).
- Subject to applicable law, if Shearwater is merged, sold, or in the event of a transfer of some or all of our assets (including in bankruptcy), or in the event of another corporate change, in connection with such a transaction, or for pre-transaction review in relation to such transactions.
- Your personal information may be shared if we anonymise and/or aggregate it, as in these circumstances the information will cease to be personal information.

Utilisation Information
We may share information with our organisational clients about how their employees use the sites and the resources available to them through the sites (e.g., how employees used certain features of the sites, utilisation trends, which features were most popular with the client's employees).

3. DATA SUBJECT RIGHTS

In certain circumstances, you have certain rights regarding your personal information. A summary of each right and how you can exercise it is set out below. To exercise any of these rights, please contact us. Such requests should include information to allow us to verify your identity (e.g., your name, address, email address or other information reasonably required).

When we receive your request to exercise one of these rights, we will respond without undue delay and in any event within one month of receipt of the request. This may be extended by a further two months in certain circumstances e.g., where requests are complex or numerous.

We will provide the information free of charge, except where requests are manifestly unfounded or excessive e.g., because of their repetitive character. In these circumstances we may charge a reasonable fee or may refuse to act on the request. We will advise you of any fees prior to proceeding with a request.
You have the right to access personal information we hold about you and to be provided with a copy of the information (in most circumstances). You also have the right to correct any information we may hold about you that is inaccurate.

Right to restrict use of your personal information
You have the right to ask us to restrict processing of your personal information where one of the following applies:

- The processing is unlawful, but you want us to restrict use of the data instead of deleting it.
- Where you contest the accuracy of your personal information, the restriction will apply until we have verified the accuracy or corrected your personal information.
- We no longer require the personal information for the purposes of processing but are required to keep it in connection with a legal claim.
- You have exercised your right to object to the processing. The restriction will apply until we have taken steps to verify whether we have compelling legitimate grounds to continue processing.

Right to request deletion of your personal information

- You have the right to ask us to delete your personal information in certain circumstances. If you want to opt out from receiving marketing communications, the best way to do so is to allow us to retain your information with a “do not contact” tag so we know not to contact you in the future.

There are also certain exceptions where we may refuse a request for erasure, for example, where the personal information is required to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

Right to object to processing of your personal information

- You may object to our use of your personal information for marketing purposes.

You may also object to processing of your personal information in cases where we have used legitimate interests as the basis for processing. In such cases, we will stop processing your personal information until we verify that we have compelling legitimate grounds for processing that outweigh your interests, rights, and freedoms in asking us to stop processing the data, or in limited cases where we need to continue processing the data for the establishment, exercise, or defence of legal claims.

Right to data portability

- In most cases, you have the right to receive all personal information you have provided to us in a structured, commonly used, and machine-readable format and to transmit this data to another data controller, where technically feasible.
- Right to lodge a complaint with a supervisory authority
- If you object to our processing of your personal information, you have the right to complain to the data protection authority in the country where you reside, where you work, or where the alleged infringement of data protection laws has taken place.
4. INTERNATIONAL TRANSFERS
Shearwater is a global company, and we may transfer personal information to other Shearwater group companies or suppliers outside your country. Shearwater will take reasonable steps to ensure that personal information is protected and any such transfers comply with applicable law.

Shearwater may transfer and maintain the personal information of individuals covered by this Policy on servers or databases outside the European Economic Area (“EEA”). Some of these countries may not have the equivalent level of protection under their data protection laws as in the EEA.

The countries to which we transfer data outside of the EEA may include any of the countries in which Shearwater does business.

Retention periods
We will retain your personal information for as long as required to perform the purposes for which the data was collected, depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations require us to retain it.

In general terms, this will mean that your personal information will be kept for the duration of our relationship with you and:
- the period when we might reasonably expect you to be active in the industries we serve;
- the period required by tax and company laws and regulations; and
- if it is necessary for you to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under local laws.

5. CHOICES ABOUT YOUR INFORMATION
We believe it is important to give you choices about the use of your information. We will use your information as described in this Policy (or any other conference or service specific privacy policy). If we want to use your information for a purpose not described in this Policy, we will first get your consent to do so.

Marketing Communications
We will respect your wishes not to receive marketing communications. You can change your marketing preferences by contacting us at the address here. If you gave us your email address to receive marketing communications, you can opt out at any time by using the unsubscribe links or instructions included at the bottom of our emails. Please note that we will continue to send you service-related communications regardless of any opt out request. We will not sell or share your information or information with third parties (other than our subsidiaries or affiliates) for their own promotional or marketing purposes unless you give us consent to do so and where permitted by applicable law.
6. SECURITY

We have implemented administrative, technical, and physical security measures to help prevent unauthorised access. Despite these measures, no data transmission over the Internet can be entirely secure and we cannot guarantee or warrant the security of any information you transmit via our websites or apps. Please note that you are responsible for maintaining the security of your credentials used to access any Shearwater service or account, and you must report suspected unauthorised activity to us.

We make reasonable efforts to restrict access to information to only those employees, contractors, and agents who need such access to operate, develop, improve, or deliver our programs, products, and services.

7. COOKIES AND SIMILAR TECHNOLOGIES

What are cookies?
A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first party cookies. We also use third party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts.

How do we use cookies?
More specifically, we use cookies and other tracking technologies for the following purposes:

- Assisting you in navigation;
- Assisting in registration to our events, login, and your ability to provide feedback;
- Analyzing your use of our products, services or applications;
- Assisting with our promotional and marketing efforts. (including behavioral advertising)

Below is a detailed list of the cookies we use on our Website. Our Website is scanned with our cookie scanning tool regularly to maintain a list as accurate as possible. We classify cookies in the following categories:

- Strictly Necessary Cookies
- Performance Cookies
- Functional Cookies
- Targeting Cookies

Shearwater utilises a Cookie Consent management service provided by www.onetrust.com. You can opt-out of each cookie category (except strictly necessary cookies) by clicking on the "cookie settings" button below:

<table>
<thead>
<tr>
<th>Cookie Type</th>
<th>What these cookies do</th>
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</thead>
<tbody>
<tr>
<td>Essential cookies</td>
<td>These cookies are necessary for the website to function and</td>
</tr>
</tbody>
</table>
cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site may not work then.

| Targeting cookies | Targeting cookies are used to analyse the use of our website(s), to build a profile of your interests, to show you relevant adverts and to understand the urgency and nature of the need of our website visitors. We generate information about the use of our website(s) by means of cookies and other web-tracking technology. The information generated relating to our website(s) is used to identify our customers' visits and to determine their interests mainly for sales and marketing purposes. |
| Social media cookies | These cookies allow users to share our websites on social media such as LinkedIn, Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies of the social media provider for how their cookies work. |
| Analytics cookies | These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site. |
| Functionality cookies | These cookies allow the provision of enhance functionality and personalization, such as videos and live chats. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these functionalities may not function properly. |

**Cookie List**

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the following purposes:

**Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.
### Social Media Cookies
These cookies are set by a range of social media services that we have added to the site to enable you to share our content with your friends and networks. They are capable of tracking your browser across other sites and building up a profile of your interests. This may impact the content and messages you see on other websites you visit. If you do not allow these cookies you may not be able to use or see these sharing tools.

### Targeting Cookies
These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.
Performance Cookies
These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

<table>
<thead>
<tr>
<th>Cookie Subgroup</th>
<th>Cookies</th>
<th>Cookies used</th>
</tr>
</thead>
<tbody>
<tr>
<td>shearwatergeo.com</td>
<td>__ga_V8T96Z30T7 , __ga , __gid , __ga_3ERDLFLMGB</td>
<td>First Party</td>
</tr>
</tbody>
</table>

If you have any questions regarding cookies which are deployed on our website, you can contact us.

You can find more information about cookies, behavioural advertising and online privacy at www.allaboutcookies.org or www.youronlinechoices.eu.

**How do I accept or reject cookies?**
Shearwater utilises a Cookie Consent management service provided by www.onetrust.com. You can opt-out of each cookie category (except strictly necessary cookies) by clicking on the “cookie settings” button.

If you do not want to be tracked by Google Analytics cookies you can opt-out by installing a browser plug-in here: https://tools.google.com/dlpage/gaoptout/
At any time, you can prevent cookies from being set on your browser. For instructions on how to block, delete or disable any cookies, please consult your browser’s ‘Help’ or ‘Support’ section. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our website.

Please consult the following links for information on cookie management and blocking according to your browser:

- Chrome: https://support.google.com/chrome/answer/95647?hl=en
- Safari: https://support.apple.com/kb/PH19214?locale=en_GB

You can also find more information and manage cookie storage at: www.youronlinechoices.eu.

8. MISCELLANEOUS

Links
We provide links to other websites or resources that are not part of the products, programs, or services run by Shearwater. We do not control these websites or their privacy practices, and any information you provide to these sites is subject to the Privacy Policies of those sites and not this Policy.

Changes to this Policy
From time to time, we may change and/or update this Policy. If this Policy changes in any way, we will post an updated version on this website. We recommend you regularly review this website to ensure that you are always aware of our information practices and any changes to such. Any changes to this Policy will go into effect on posting to this page.