

Privacy Policy for Northern Ocean Group Limited

This privacy policy cover Northern Ocean Group Limited (“Northern Ocean” or “the Company”) and all subsidiaries owned by Northern Ocean. The policy provides general information about how Northern Ocean processes personal data.

We adhere to the requirements of the General Data Protection Regulation (GDPR)¹ when processing your personal data, and safeguard your privacy in a lawful and secure way. Below you can read about what personal information we collect from you, how we process your personal information and what rights you have as a data subject.

Northern Ocean Management AS is the controller of the personal data collected and processed as described in this privacy policy.

1. What personal data does Northern Ocean process about you?

What kind of personal information Northern Ocean process about you, depends on how you have contacted us.

The personal data we process are typically:

- ✓ Contact information such as name, phone number, address and email address
- ✓ Employer and occupation
- ✓ Information provided in connection with applications, including application letter, CV, certificates and diplomas

2. Why and on which basis does Northern Ocean process personal data about you.

Northern Ocean only process personal data to the extent that we have a legal basis pursuant to the GDPR for such processing.

We process your personal data because:

- ✓ You have subscribed to our press releases: If you have subscribed to our press releases, we will process the personal data you provided us in connection with signing up. The legal basis for this processing is our legitimate interest in providing you with the press releases you have subscribed. At any time, you can unsubscribe from this service.
- ✓ You are the contact person of a third party with whom we have an agreement: Northern Ocean process personal contact information in relation to contracts with service and administration providers, customers and other similar third parties. The legal basis for

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC

this processing is that processing is necessary for the performance of the relevant contract.

- ✓ You have applied for a job with us: Northern Ocean treats personal data about you in the event you choose to apply for a position with us. This will be personal data that you have provided in order for us to process your application, and necessary information we will obtain from references. The legal basis for this processing is that processing is necessary in order to establish whether we will enter into an employment contract with you.
- ✓ You use a Webcast-link on our website: If you use a Webcast-link on our website in order to follow financial reports, we will process the personal data you provided us in connection with registering. The legal basis for this processing is our legitimate interest in obtaining information about the individuals that will follow the report and who to provide the Webcast-link.
- ✓ You visit our website: If you visit our website, we will passively track navigational data by assigning Internet tags. The legal basis for this processing is our legitimate interest in obtaining knowledge that enables us to analyze trends and to administer our website.
- ✓ We are legally obliged to do so: In other instances we may process your personal data because we are obliged to do so by law, for example pursuant to bookkeeping or tax regulations.

Sometimes we ask others for your personal data. If we do, we will ensure that we have a legal basis to do so and safeguard your rights under the GDPR and this privacy policy.

3. How does Northern Ocean protect your personal data?

We protect your personal data in various ways, such as through firewalls, passwords, and by controlling who has access to our buildings. Only authorized persons can access your personal data and we ensure that our employees only process personal data in a lawful and confidential manner.

In the case of a personal data breach, we will notify you in accordance with the GDPR, if the breach is likely to result in a high risk to your rights and freedoms.

4. To whom do we disclose your personal data?

As a main rule, we do not disclose your personal data to other parties without your consent. However, transfer of personal data from Northern Ocean to third parties will occur if it is necessary to fulfil legal requirements and the purposes described above under Section 2. Hence, personal data may be transferred to public authorities such as tax authorities, accountants, suppliers of IT systems and other service providers.

Northern Ocean has an office in Singapore, and in some instances, your personal data will be transferred between the Oslo office and the Singapore office. Northern Ocean will ensure that such transfer of personal data, in accordance with GDPR Chapter V to ensure an adequate level of protection, is carried out.

5. Northern Ocean's use of Data Processors

In some situations, Northern Ocean uses other entities to collect, store or otherwise process personal data on our behalf – i.e. we use Data Processors.

Use of Data Processors are not considered disclosure of personal data to third parties.

Since the Data Processors processes personal data on our behalf, we ensure that we have entered into data processor agreements in accordance with the GDPR and our requirements for processing personal data.

6. How long do we keep your personal data?

Northern Ocean stores your personal data as long as necessary in order to fulfil the purpose for which the data are processed and we have legal basis to process the data. Personal data we process to fulfill an agreement with you is deleted when the agreement has been terminated and all obligations arising from the agreement are fulfilled, unless we have other legitimate reasons for storing the information further.

If we process personal data to fulfill a legal obligation, the information will when the obligations are met be erased. This applies unless we have other legitimate reasons for processing the information.

Personal data processed to safeguard a legitimate interest in Northern Ocean shall be deleted when it is no longer possible to document a legitimate interest, which weighs heavier than the data subject's interest. For example, this may be because the need for the information is no longer legitimate or because the information eventually becomes outdated.

7. What rights do you have when we process personal data about you?

The GDPR shall ensure that your personal data are processed in a lawful and secure manner. Furthermore, the GDPR provides you with a set of rights that Northern Ocean as controller must adhere to when processing your personal data.

You can at any time request access to, rectification or erasure of personal data. Additionally, you can object to or request restriction of processing, and request that your data are being transmitted to another entity.

You can read more about your rights on www.datatilsynet.no or <https://ico.org.uk>.

You can make use of these rights by using the contact details in Section 10. You will receive a reply without undue delay and at the latest within 30 days.

If you experience that Northern Ocean does not process your data in accordance with the GDPR, or that Northern Ocean does not fulfil your rights, you can lodge a complaint. Questions and complaints can be addressed to us by using the contact details mentioned in Section 10. Alternatively, you can lodge a complaint with the Norwegian Data Protection Authority. See information about this on www.datatilsynet.no.

Data subjects located in another EU/EEA state may lodge a complaint with the relevant supervisory authority. See information about this on <https://ec.europa.eu>.

8. Use of cookies

In order to properly maintain our website, we passively track navigational information using cookies and by assigning Internet tags. These passive information-tracking mechanisms are used to create log files, in which we record IP addresses, browser types, referring and exit pages,

platform type, and other non-personally identifiable information that is useful for administering our website.

We also use the information we collect from you passively during your visit to analyze trends and to administer our website. For example, we use this information to determine fluctuation of visitor numbers from week to week, to diagnose problems with our server, and to improve your web experience.

If you do not wish for us to collect cookies, you may set your browser to refuse cookies, or to alert you when cookies are being sent. If you do so, please note that some parts of this website may not be accessible or function properly. You should be aware that we cannot control the use of cookies (or the resulting information) by third parties, and use of third party cookies is not covered by this privacy policy.

9. Changes

In the event of changes to our services or the GDPR, it may result in changes of this privacy policy. Updated information will always be available on our website.

10. Contact details

You may direct any questions or comments you may have about Northern Ocean's processing of personal data, for further information, or to use your rights, by contacting us.

The contact details of Northern Drilling Management AS are:

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0125 Oslo
Norway

Tlf: +47 22017340

E-mail: gdpr@northernocean.no