



## SEAPEAK PRIVACY NOTICE

This is the global privacy notice (“**Privacy Notice**”) of the Seapeak group of companies, which currently comprises, Seapeak LLC and its subsidiaries (together, “**Seapeak**”).

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### 1. SCOPE

This Privacy Notice explains how we collect and use personal information from you or about you on our websites, social media presence, via written or verbal communications with us, mobile applications, or from other sources. While this Privacy Notice broadly describes the practices, we have adopted across Seapeak globally, local laws vary, and some jurisdictions may place restrictions on our processing activities. Therefore, our actual practices in such jurisdictions may be more limited than those described herein to enable us to comply with local privacy requirements.

### 2. PERSONAL INFORMATION

In general, the types of personal information, that we may collect from you, will depend on the nature of your relationship with Seapeak. In this respect, we may collect, use and store different types of personal information about you, which we have grouped together as follows:



Types of Personal information	Description
Identifying information	Personal identification information, such as your name, contact details, email, date of birth, nationality, gender, photograph and phone numbers.
Financial	Your financial position, status and history.
Social-demographic	Details about your work or profession, nationality, education, employment details, qualifications, awards and where you fit in to various social or income groupings.
Contractual	Details about the services we provide to you.
Internet use	Information about how you interact with us, including technical information such as the Internet protocol (IP) address used to connect your computer to the internet.
Special Category Personal Data (if any)	Information concerning your health in the event that you are involved in an accident whilst on a Seapeak vessel or premises

**'Your personal information'** does not include data where your identity has been removed (e.g., anonymous information).

### 3. WHERE WE COLLECT YOUR PERSONAL INFORMATION FROM

We collect personal information that you provide to us in the ways described in How we use your personal information immediately below. We may also collect personal information about you or your business through our websites or by other means (such as email, fax, mail, phone, mobile applications, third-party applications, our parent, subsidiary, or affiliate companies, business partners, and other third-parties such as shipping or port authorities, insurance companies, and public databases).

### 4. HOW WE USE YOUR PERSONAL INFORMATION

In general terms, we collect and use personal information to:

- deliver our shipping services
- meet our legal and contractual responsibilities
- verify your identity where this is required
- contact you by post, email or telephone
- understand your needs and how they may be met



- maintain our records
- process financial transactions
- prevent and detect crime, fraud or corruption

More specifically, the principal ways in which we use your personal information and the legal reasons we rely on are stated below:

## Contact

You may contact us with questions, requests or comments through the “Contact” link on our websites (such as [www.Seapeak.com](http://www.Seapeak.com)) or via the contact information provided in the “How to Contact Us” section of this Privacy Notice. When you do so, we may ask you for your personal information to verify your identity or to track the inquiry internally to ensure we respond to your questions, requests or comments.

## News Releases, Newsletters and Other Communications

You may provide personal information such as your name and contact details to receive our news releases (such as, Seapeak Corp News Releases and Press Releases), business alerts, newsletters and other communications (including emails). Where we have an existing relationship with you or you have otherwise consented to do so, we will use the information you provide to send you the communications and information you have requested and to communicate with you about our shipping services. If you no longer want us to send these communications, you can choose to unsubscribe from our mailing list by selecting the unsubscribe button found at the bottom of every email sending this business communication or contacting us via the contact information provided in the “How to Contact Us” section of this Privacy Notice.

## Social Media

You may also choose to connect to us via social media platform where Seapeak has a presence including, but not limited to: Facebook, LinkedIn, Twitter, YouTube, Flickr, Instagram, SlideShare, RSS Feeds. When you connect to us via a social media platform we may collect personal information that you have provided to that service in accordance with the service’s applicable terms of use and your privacy settings within that social media platform service.

## Shore and Sea Careers

Individuals from all over the world apply for jobs with Seapeak through the “Sea Careers” or similar websites, third-party job posting sites, or directly to the business locations. The information submitted by job candidates, such as name, contact details and any other information relevant to the application is used to evaluate their qualifications for employment and to contact them regarding possible employment opportunities.

## Contractual Obligations



If you are a customer, client, service supplier, vendor or a contractor, we may ask you to provide personal information such as your name, photo (to access vessels, installations, or shipyard facilities), contact details or business and, for individuals, financial details to establish and administer your account, process payments, and for compliance with internal and legal requirements (which may include medical testing and monitoring requirements, where applicable). We use your information for this purpose so that we can comply with our contractual obligations to you and also because we have a legitimate interest in performing and managing our contracts efficiently. We will also use information, that you may give to us when you talk to us over the phone, and or email us, in connection with our contractual relationship with you or your employer (agreements such as Time Charter Parties, Bareboat Charter Parties, Shipbuilding Contracts, etc.) for the same purposes and relying on the same reasons.

## Incidents

When you provide information about an incident on board of our vessels, installations or other assets, detailed personal information including your name, contact details and any relevant information about the incident or allegation may be collected. We use these details to investigate and comply with any applicable company or legal requirement. We may transfer and disclose your information to third-parties as required in the course of the investigation or to comply with any legal obligation related to the information you provide.

## Feedback

You may be able to submit feedback over the phone, by email or mail. If you choose to give us your feedback, we may ask you for your personal information. We may also ask you about your experience using our websites. It is in our legitimate business interests to use the information you provide to enhance our websites, evaluate the quality of our products, or to communicate with you about products and services.

## Information Technology Security

We may collect personal information when detecting and protecting against security threats in accordance with our legitimate business interests and our legal obligations. We use various IT tools to detect and protect against online security threats (e.g., attacks, viruses, malware, spam, phishing, malicious web content), to promote business continuity of our information systems and assets, and to maintain optimal performance of our IT systems. To ensure physical security of our vessels, installations, facilities or offices we may, where permitted under local law, utilize surveillance systems and/or location tracking while you are on Seapeak property.

## Other Uses of Information

We may use the personal information you provide to us for internal general business purposes in accordance with our legitimate business interests. These purposes include administration of our websites, fraud prevention, stock exchange requirements, corporate/asset transactions and restructuring and compliance with our legal obligations, standards, policies and procedures (i.e., due diligence checks and sanction screening where applicable).



## Sea-training, Awards

You may provide personal information such as your name, contact details, education details, employment details, qualifications, awards, etc. when applying for sea-training, grants or awards offered by Seapeak. It is in our legitimate business interests to use the information you provide in the selection process, to communicate with you and to publish a list of the recipients. It is necessary for you to provide us with the information requested so that we can assess your application.

## Data from third parties that we work with

Such as publicly available resources, companies that introduce you to us, business partners.

## Accidents or illness

In the event that you are involved in an accident in which you are injured or hurt or fall ill on board of a vessel or installation, we may process information about your health in order that you may receive appropriate medical care or treatment. We may collect and use certain types of personal information when we are required to do so by law or with your explicit consent (for example, when we process special category personal information). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this Privacy Notice.

## 5. INFORMATION WE COLLECT BY AUTOMATED MEANS

When you visit and interact with our websites and applications, we may collect other information that does not inherently reveal your specific identity, in order to learn how to best tailor our websites for our visitors. Examples of what other information we may collect and how we and third-party service providers may collect this information include:

### Cookies

A cookie is a small text file that is placed on your computer or mobile device when you visit certain websites. It is stored in your browser while the website is being viewed. For more information on cookies, Seapeak invites you to visit the following link: [www.allaboutcookies.org](http://www.allaboutcookies.org). Cookies allow us to collect information such as browser type, time spent on the online services, pages visited, referring URL, and other aggregated website traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, to collect statistical information, and to personalize your experience while online.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You can choose whether to accept cookies by changing the settings on your browser or, depending on your jurisdiction, by managing your tracking preferences as



noted in a separately posted cookie Notice or via a posted cookie manager. If, however, you do not accept cookies, you may experience some inconvenience in your use of the online services. For example, we may not be able to recognize your computer, and you may need to log in every time you visit.

## Browser and Device Information

Certain information is collected by most browsers or automatically through your device, such as your computer type, operating system name and version, device manufacturer and model, Internet browser type and version and the name and version of the online services (such as the Apps) you are using. We use this information to ensure that the online services function properly.

## IP Address

Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files whenever a user accesses the online services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering our online services. We may also derive your approximate location from your IP address to understand from what regions of the world our website visitors come.

## 6. WHO DO WE SHARE YOUR INFORMATION WITH?

We will not sell your personal information, nor will we otherwise disclose it except as described in this Privacy Notice. We may also share your information in the following circumstances:

### Within Seapeak

In general terms, we restrict access to your information to those persons who need to use it for the relevant purpose. Your information may be shared with Seapeak staff responsible for the processing activities outlined above on a business need-to-know basis and only to the extent reasonably necessary to perform their functions or comply with applicable legal requirements.

### Outside of Seapeak

In some instances, we utilise third parties to provide support for the activities outlined in this privacy Notice. Third parties with whom we share some personal information may include customers, agents, business partners, attorneys, advisors, and service companies.

### Business Transfers



We may disclose your personal information, usage information, and other information about you to parties acquiring part or all of our vessels, installations and/or other assets, as well as to attorneys and consultants. If we transfer your information to an acquirer, we will use reasonable efforts to direct the acquirer to use your information in a manner that is consistent with this Privacy Notice. Also, if any bankruptcy or reorganization proceeding is brought by or against us, your information may be considered a company asset that may be sold or transferred to third parties.

## Port or Shipping Authorities, Courts, Regulators, Government Authorities or other Third Parties

We may transfer and disclose your information to third parties including (but not limited to) Port or Shipping Authorities, Courts, Regulators, Government Authorities and hospitals and emergency services

- when we believe in good faith that the law requires us to do so;
- at the request of governmental authorities or shipping/port authorities conducting an investigation;
- to verify compliance with, or enforce, our policies, general conditions and other agreements;
- to protect the rights, property, safety, security or health of Seapeak, our customers, users of our services or others or safety at sea;
- to respond to an emergency;
- when we believe disclosure is necessary or appropriate to prevent physical harm, vessel/installation loss or financial loss; and/or
- in connection with an investigation of suspected or actual illegal activity.

## 7. AUTOMATED PROCESSING

Currently, Seapeak does not take decisions about individuals based solely on automated processing (i.e., without human involvement) which have a legal or similarly significant effect on them.

## 8. LINK TO OTHER SITES

Our websites and communications may provide links to other websites, including to social medias or partners that may use our logos as part of a co-branding agreement. To the extent that any linked services are not provided by Seapeak, we are not responsible for the services, or any of the content found on these websites. If you provide information on and use third-party services or websites, the privacy notices and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.



## 9. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Because Seapeak is a global organisation that does business in many countries. We may share your personal information among Seapeak, its affiliates, our service providers, and other third parties that may be located in countries outside of your own country. Although the data protection laws of these various countries may differ from those in your own country, we will take appropriate measures to ensure that your personal information is handled as described in this Privacy Notice and in accordance with the law.

For individuals located in the European Economic Area (EEA) or in the United Kingdom (UK), your information may be accessible outside the EEA/UK subject to suitable safeguards. In this respect, your personal information may be accessed by a restricted number of individuals of our staff, agents or contractors from a country outside the EEA/UK for any of the purposes set out above, in which data protection laws may be of a lower standard than in the EEA or the UK. We will ensure that any of your information that is accessible outside the EEA/UK is handled subject to appropriate safeguards.

Certain countries outside the EEA, such as Andorra, Argentina, Canada (limited to companies), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland, and Uruguay have been confirmed by the European Commission as providing adequate level of protection for the data subjects' rights and freedoms. In countries which have not had such adequacy confirmation, we will either ask for your consent to the transfer your personal information or transfer it in accordance with the requirements of relevant data protection law, which may include standard contractual clauses approved by the European Commission.

## 10. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

In general terms, we will only retain your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will keep your personal information for a period of time that enables us to:

- Maintain business records for analysis, compliance and/or audit purposes
- Comply with record retention requirements under the relevant law
- Defend prosecute or make existing or potential legal claims against you, us or a third party.
- Address any queries or complaints you may have regarding our services

If your personal information is used for more than one purposes, we will retain it until the purpose with the latest period expires; however, we will stop using it for the other purposes with a shorter period once these shorter periods expire.

Your information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely erased/destroyed.





## 11. PROTECTING YOUR PERSONAL INFORMATION

In proportion to the sensitivity of the personal information, we maintain reasonable administrative, technical and/or physical safeguards and appropriate security measures to protect personal information from loss, misuse or unauthorized access, disclosure, alteration, or destruction. However, we cannot guarantee the security of your personal information because no electronic data transmission or storage of information is completely secure. If an incident is reported affecting your personal information, we will investigate and comply with all required reporting obligations.

## 12. APPLICABLE DATA PROTECTIONS LAWS

The EU General Data Protection Regulation 2016/679 (the "**GDPR**") is a European Union data protection law which came into force on 25 May 2018. In the context of this Privacy Notice, the GDPR applies to the processing of personal information:

- in the context of activities of establishments within the European Economic Area (i.e., the member states of the European Union (EU) together with Iceland, Liechtenstein and Norway);
- of individuals within the EEA by non-EEA establishments where the processing activity relates to the offering of goods and services to those individuals or to the monitoring of their behaviour within the EEA; and
- on vessels which are flagged under a flag of a state of the EEA.

The GDPR has been retained in UK law as the UK GDPR, and will continue to be read alongside the (UK) Data Protection Act 2018,

Clearly, the GDPR or UK GDPR does **not** apply to all processing of personal information carried out by Seapeak.

### Individual Rights under the GDPR

In circumstances where the GDPR does apply to particular personal information processing in accordance with these rules, the individuals whose personal information is being processed have the following rights under the GDPR:

- **Access to personal information:** Individuals have the right to request a copy of the personal information about them that we hold.
- **Correcting personal information:** Individuals may ask us to correct any personal information about them that is inaccurate, incomplete or out of date.
- **Deletion of personal information:** Individuals have the right to ask us to delete personal information about them where:
  - They consider that we no longer require the information for the purposes for which it was obtained.
  - We are using that information with their consent and that consent has been withdrawn (see below - [Withdrawing consent to using your information](#)).



- They have validly objected to our use of their personal information (see below - Objecting to how we may use personal information below)
- Our use of the individual personal information is contrary to law or our other legal obligations.
- **Objecting to how personal information is used:** Individuals have the right at any time to require us to stop using their personal information for direct marketing purposes.

In addition, where we use personal information of an individual to perform tasks carried out in the public interest or on the basis of legitimate interest then, if the individual asks us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

- **Restricting how we may use personal information:** In some cases, individuals may ask us to restrict how we use their personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold or assessing the validity of any objection made by an individual to our use of their information. The right might also apply where there is no longer a basis for using an individual's personal information, but they don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with the individual's consent, for legal claims or where there are other public interest grounds to do so.
- **Portability:** If we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.
- **Withdrawing consent to using personal information:** Where we use personal information with individual consent the individual may withdraw that consent at any time and we will stop using that personal information for the purpose(s) for which consent was given.
- **Complaint:** You may have the right to lodge a complaint about the processing of your personal information with a local data protection supervisory authority having jurisdiction over the processing.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate. Please note that we will likely require additional information from you in order to verify your identity and respond to your requests. If you would like to discuss or exercise your applicable rights, subject to limitations established under local law, please contact us via the contact information provided in the *"How to Contact Us"* section of this Privacy Notice.

## Additional Notice for California Residents

This part of our Privacy Notice applies to consumers who reside in the State of California. If you are a California resident and have provided us with your personal information, you may ask us to refrain from sharing your personal information with third parties, including our affiliates, for direct marketing purposes. In this respect, we have not disclosed to other businesses or third parties any personal information for monetary or other valuable consideration within the twelve (12) months preceding the effective date of this Privacy Notice.



With respect to California residents, references to "personal information" in this Privacy Notice means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, subject to certain exceptions set forth in the California Consumer Privacy Act (the "CCPA").

If you are a California resident, you have certain rights, subject to certain exceptions as set forth in the CCPA:

- **Right to Access and Information regarding Personal Information:** You may request that we disclose to you: the categories of California Personal Information we have collected about you in the twelve (12) months preceding your request.
- **Right to Data Portability:** You have the right to receive a copy of your electronic personal information in a readily usable format.
- **Right to Know:** You have the right to receive information from us regarding the categories of personal information we collected, the sources from which we collect personal information, the purposes for which we collected and shared personal information, the categories of any personal information we sold as well as the categories of third parties to whom such personal information was sold, and the categories of personal information that we disclosed for a business purpose in the 12 months preceding your request.
- **Right to Deletion of Personal Information:** You have the right to request that we delete personal information about you which we have collected from you. Please note that, in certain instances, we may not be able to process your request, such as due to the existence of a legal obligation, to detect or contain security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities, or in order to complete an action or a transaction for which your personal information was collected.
- **Right to Opt Out:** You have the right to opt out of the disclosure of personal information about you for monetary or other valuable consideration.
- **Right to Non-Discrimination:** We may not discriminate against you in response to your exercise of the above rights.

Note that certain of the rights set forth above do not apply until January 1, 2021 for job applicants, employees, partners, and contractors, and when personal information is transmitted in business-to-business written or verbal communications or transactions relating to due diligence, or providing or receiving a product or service to or from another business, and the personal information concerns an employee, owner, director, officer or contractor of that business.

You may exercise these rights free of charge except as otherwise permitted under applicable law. As required or permitted under applicable law, please note that we may take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may limit our response to your exercise of the above rights as permitted under applicable law. We may not discriminate against you in response to your exercise of the above rights.

You may request to exercise these rights by contacting us via the contact information in the "How To Contact Us" section of this Privacy Policy.



## 13. CHANGES TO OUR PRIVACY NOTICE

We keep this Privacy Notice under regular review and will place any updates on our company website.

This Privacy Notice was last updated on January 2022.

## 14. HOW TO CONTACT US

### To opt out of future communications

At any point in time you may opt out from receiving future communications from us by:

- Clicking the link at the bottom of our communication indicating your desire to “opt-out” or “unsubscribe,” or;
- By sending an email to [media@Seapeak.com](mailto:media@Seapeak.com) together with the Seapeak email address or phone number from where you received the communication and specifying that you would like to unsubscribe from future communications.

### Questions regarding personal information privacy

If you have any questions, comments or are seeking further information about the matters referred to in this Privacy Notice or if you would like us to remove or update information, we have about you, please email us at [michel.nielsen@seapeak.com](mailto:michel.nielsen@seapeak.com).

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