



SEAPEAK RECRUITMENT PRIVACY NOTICE

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

Click on one of the links below to jump to a specific section:

1. [Purpose and scope](#)
2. [What is your personal information?](#)
3. [Where does your personal information come from?](#)
4. [What types of information do we collect about you?](#)
5. [How do we use your information?](#)
6. [Automated Processing](#)
7. [Who do we share your information with?](#)
8. [International Transfers of Personal Information](#)
9. [How Long Do We Keep Your Personal Information?](#)
10. [Protecting Your Personal Information](#)
11. [Applicable Data Protection Laws](#)
12. [Contact Information](#)
13. [Appendix to Recruitment Privacy Notice of Seapeak group of companies](#)

1. Purpose and scope

This Privacy Notice explains how we will collect and use your personal information in the context of the recruitment process and your rights in relation to your personal information. We may amend this notice at any time.

The corresponding Seapeak entity in charge of your recruitment process is a data ‘controller’, which means it is responsible for deciding how we hold and use your personal information.

This Privacy Notice applies to individuals applying to work with us, including prospective employees onshore, offshore and at sea, and contractors, except to the extent that a Seapeak affiliate has implemented its own employee/contractor privacy Notice or other governing local policy that applies to you due to personal information protection restrictions in your local jurisdiction. 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. What is your personal information?

In this Privacy Notice, '**your personal information**' means your personal data; i.e., information about you from which you can be identified. 'Your personal information' does not include data where your identity has been removed (e.g., anonymous information).

'**Special categories of personal information**' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

It is important that your personal information is accurate and up to date. Please inform us if your personal information changes during the recruitment process.

3. Where does your personal information come from?

Your personal information will come from you or us, and may also come from the following sources:

- directly from you
- recruitment agencies may provide us with information about you, your qualifications and your work history as well as the curriculum vitae you provided to them
- former employers or other referees, whom you have given us permission to contact, may provide us with a reference for you which will normally include your dates of employment and most recent position held but may also detail past performance information from assessments and feedback of your work performance
- medical professionals may provide us with information regarding your health
- other third parties who provide services to or work with us
- other Seapeak affiliates and joint ventures
- education and training providers who may give us information about course and program completion
- publicly available sources, such as Companies Registries or Commercial Registries.

If you would like more information on the source of your personal information, please contact our Human Resources (HR) department.

4. What type of information do we collect about you?

In general terms, categories of information we may collect from you and the sources indicated above include:

- Identifying information (such as your name, contact details, nationality, address, date of birth).
- Education, employment, and work information (such as qualifications, work record, assessments).



- Family information related to benefits administration, accompanying travel, vessel access and for emergency contact (such as family composition, emergency contact details, leave arrangements).
- Financial information (such as bank details for administering payroll, benefits).
- Government issued information (such as tax identifiers, residence status and travel/immigration documents) confirming your right to work in a specific country or on board of specific vessel. If you don't provide this, we may not be able to enter into a contract with you.
- Responses to qualitative interview questions.

We will process this information to enter a contract with you, to comply with a legal obligation, for our legitimate interests (in selecting suitable employees onshore, offshore and at sea, workers and contractors), to exercise or perform employment law rights or obligations and for the purposes of preventative or occupational medicine or for the assessment of your working capacity.

Special Category Personal Information

As explained above, some types of information may be defined as special category personal information. These special categories have additional protection under local data protection laws. In this respect, we do not collect or otherwise process special categories personal information about job applicants except where the processing is permitted or required by applicable law or we have obtained the applicant's explicit consent for the processing of such information, where such consent may be required.

For candidates applying to seafarer roles, positions offshore, or for positions that may require you to travel offshore, we may collect health related information, including medical fitness examination results, to ensure personal and operational safety at sea.

To optionally enable future trade union dues to be deducted from payroll or have other related benefits, candidates may elect to share trade union membership information. This information is not a condition of consideration for employment or necessary to enter into a contract with you.

5. How do we use your information?

We may process your personal information during and after the recruitment process. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

In general, we process your personal information for the reasons, and on the legal grounds set out in the below appendix, and also to:

- Retain records relating to the recruitment process
- Assess qualifications and certifications
- Establish, exercise or defend legal claims
- Comply with the law or requirements of a regulator or flag authority
- Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency).



Additional detail regarding how we use your information

The appendix to this Privacy Notice provides more information on the types of information we collect and also our legal grounds for processing your personal information.

6. 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.

7. Who do we share your information with?

We may share your personal information with the following third parties if this is required by law; necessary to enter a contract with you; where there is another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- Other entities in the Seapeak group of companies for the purposes of evaluating and assessing your candidature.
- Health professionals and occupational health providers involved in your care, for the purposes of establishing whether you can undergo an assessment which forms part of the application process; considering reasonable adjustments to the recruitment process for disabled applicants; establishing whether you will be able to carry out a function that is intrinsic to the particular work; establishing whether you are eligible for our guaranteed interview scheme for disabled applicants; and /or assessing your fitness to work if you have accepted an offer of work from us that is subject to health checks.
- If required, travel agencies to make flight, hotel and other travel arrangements
- Our professional advisors to prepare your contract, to assist with travel/work visa and immigration applications and to register you for certain benefits
- Other third parties as necessary to comply with the law

Additionally, we may share your information with government authorities as required by local law (e.g., port state control, flag authorities, courts, regulators, public authorities, and other regulatory reporting).

A limited number of third parties manage hosted (e.g., “cloud based”) solutions where Seapeak maintains some of its employee/contractor personal information.

8. International Transfers of Personal Information

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. 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 candidates located in the European Economic Area (EEA) or 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 HR staff for any of the purposes set out above, in which data protection laws may be of a lower standard than in the EEA/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, UK, 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 or transfer in accordance with data protection laws, which may include standard contractual clauses approved by the European Commission.

9. How Long Do We Keep Your Personal Information?

If you don't start work with us following the recruitment process, we will, in principle, retain your personal information for twelve months thereafter to allow us to establish, exercise or defend legal claims.

If you would like that we retain your personal information so that we can contact you to discuss future work opportunities, we will ask that, on that basis, you provide your consent to us retaining your personal information for a fixed period in accordance with the relevant local law.

If you start work with us following the recruitment process, we will give you a copy of our Global Privacy Notice for employees/contractors and will retain your personal information as detailed in that Notice.

10. 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. In this respect, Seapeak practices a variety of technical and organisational measures meant to safeguard personal and confidential information. These measures include appropriate use and business conduct policies, cybersecurity training, risk assessment, system access controls, and a variety of network and endpoint technical security technologies and practices.

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.

11. Applicable Data Protections Laws

Seapeak is a global business operating in many jurisdictions and we are committed to complying with all data protection laws that apply to the processing of personal information that we carry out.



European Economic Area and UK

The EU (and UK) General Data Protection Regulation 2016/679 (the "**GDPR**") is a European Union data protection law which will come 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) and the UK;
- 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/UK.

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

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 have the right to lodge a complaint about the processing of your personal information with an EEA member state data protection supervisory authority having jurisdiction over the processing.

For queries as to whether the GDPR applies to the processing of your personal information or, if the GDPR does apply, and you wish to exercise any of these rights then please contact us - see below the Section: *Contact information*.

12. Contact information

Job application questions and updates

If you have a question regarding your application and have been contacted by a Seapeak recruiter, please direct your inquiries to that person. For shore positions posted online, you may update a saved candidate profile or resubmit a new application.

For applicants to sea positions, if you have updates to your personal information, such as address changes, sea experience, or certification updates please resubmit your application to the appropriate email address as listed on our Sea Careers website.

Questions regarding personal information privacy

If you have a question regarding this privacy notice or the handling of your personal information, you may contact the privacy group by emailing Legal@Seapeak.com.



13. Appendix to Recruitment Privacy Notice

Reason for processing your personal information	Legal basis for processing	Legitimate interests (where applicable)
Contact you regarding the recruitment process and any offer of work	To enter a contract	
Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work	To enter a contract To comply with a legal obligation For our legitimate interests	<ul style="list-style-type: none"> To select suitable employees, workers and contractors
<p>If you have accepted an offer of work from us that is subject to such checks:</p> <ul style="list-style-type: none"> Take up references (from referees whom you have given us permission to contact); Carry out background checks; and/or Confirm your professional memberships, registrations and / or qualifications. 	To enter a contract To comply with a legal obligation For our legitimate interests	<ul style="list-style-type: none"> To select suitable employees, workers and contractors
Comply with health and safety obligations	To comply with a legal obligation <u>*For special categories of information:</u> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations For the purposes of preventive or occupational medicine, or for the assessment of your working capacity 	
Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency)	To protect your vital interests or those of another person <u>*For special categories of information:</u> <ul style="list-style-type: none"> To protect the vital interests of you or another 	



Reason for processing your personal information	Legal basis for processing	Legitimate interests (where applicable)
	person, if you are incapable of giving consent	
<p>Check you are legally entitled to work in the country in which you are being employed to work</p> <p>Apply for required authorizations or permits for vessel trade route and jurisdiction including, but not limited to, port pre-arrival information</p>	<p>To enter a contract</p> <p>To comply with a legal obligation</p>	
<p>Determine the terms of any potential contract between you and us</p>	<p>To enter a contract</p> <p>To comply with a legal obligation</p>	
<p>If you have accepted an offer of work, check you are legally entitled to work in a specific country, vessel or installation.</p>	<p>To enter a contract</p> <p>To comply with a legal obligation</p>	
<p>Establish whether you can undergo an assessment which forms part of the application process</p> <p>Consider reasonable adjustments to the recruitment process for disabled applicants</p>	<p>To enter a contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests</p> <p>*For special categories of information:</p> <p>To exercise or perform employment law rights or obligations</p>	<ul style="list-style-type: none"> To select suitable employees, workers and contractors
<p>Establish whether you will be able to carry out a function that is intrinsic to the particular work</p> <p>If you have accepted an offer of work from us that is subject to such a check: assess your fitness to work via a health questionnaire or medical report</p>	<p>To enter a contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests</p> <p>*For special categories of information:</p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations <p>For the purposes of preventive or occupational medicine, or for the</p>	<ul style="list-style-type: none"> To select suitable employees, workers and contractors



Reason for processing your personal information	Legal basis for processing	Legitimate interests (where applicable)
	assessment of your working capacity	
Carry out equal opportunities monitoring	For our legitimate interests <u>*For special categories of information:</u> <ul style="list-style-type: none"> • To review equality of opportunity or treatment • To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> • To review equality of opportunity or treatment
To identify behavioural drives, self-management and leadership styles	For our legitimate interests	<ul style="list-style-type: none"> • Effectively communicate with and integrate new employees • Understand team dynamics • Establish individual development programs and succession plans