

## PRIVACY POLICY

This privacy policy ("**Privacy Policy**") explains how we, Cyprus Hydrocarbons Company (C.H.C) Ltd, a limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE312877, registered office address at 53, Victory Building, 2018, Strovolos, Cyprus ("**we**" "**us**" or "**our**") handle and treat personal information of the following persons ("**you**", "**your**" or "**yours**"): (i) persons that access our website at [www.chc.com.cy](http://www.chc.com.cy) ("**Website**") and use the "Contact Us" section of the Website to get in touch with us; (ii) persons that access our Website and respond to a vacancy published thereon; (iii) to the extent applicable, persons that respond to a vacancy published by us on LinkedIn at [www.linkedin.com/company/cyprus-hydrocarbons-company](http://www.linkedin.com/company/cyprus-hydrocarbons-company); (iv) persons employed by and/or representing and/or acting on behalf of entities that have tendered for and/or have been awarded by us a professional services contract; and (v) persons that register with us for participation to any events and/or activities that we may organise.

### Who we are – Mission

The Cyprus Hydrocarbons Company (C.H.C) Ltd was prescribed by the Council of Ministers of Cyprus as the legal entity responsible for the management of the Republic of Cyprus' participation in the activities of prospecting, exploring and exploiting hydrocarbons, based on Article 16 of the Hydrocarbons (Prospection, Exploration and Exploitation) Law of 2007, as amended. In particular, the Cyprus Hydrocarbons Company (C.H.C) Ltd is responsible for the commercial management of the hydrocarbons ownership rights of the Republic of Cyprus that arise from the Production Sharing Contracts (PSCs) and the management of any commercial participation by the Republic of Cyprus in midstream infrastructure projects such as land based LNG or pipelines.

We value your privacy and we only request personal information which is necessary for the implementation of our mission. We seek to keep you informed about the way we use your personal information, as well as your rights under the relevant European and national legislation.

### What personal information we collect and process

We collect and process the following personal information:

- (a) when you visit the Website and get in touch with us using the details provided at the "Contact Us" section of the Website we may, depending on the manner of your communication with us (i.e. whether by post, by phone or by e-mail), collect and process the following personal information about you:
  - Your name and surname.
  - Contact information including your e-mail address, telephone number and residential address.
  - Any other information that constitutes personal data under applicable law that you may supply us with.
- (b) when you visit the Website and respond to a vacancy published thereon we may, inter alia, collect and process the following personal information about you:
  - Name and surname.
  - Job title.

- Contact information including your e-mail address, telephone number and residential address.
  - Social Insurances Number.
  - Copy of your passport or ID card.
  - Bank account details (for instance IBAN number, branch etc).
  - CV, including, without limitation, your date of birth and/or gender if you provide it to us, your education, employment history and similar matters and similar information that you may provide to us.
  - Information relating to previous criminal convictions.
  - Information relating to any health problems that you may have.
  - Other information relevant to potential recruitment by us.
- (c) to the extent applicable, when you respond to a vacancy published by us on LinkedIn at [www.linkedin.com/company/cyprus-hydrocarbons-company](http://www.linkedin.com/company/cyprus-hydrocarbons-company), we may collect and process the personal information referred to under the immediately preceding paragraph (b) above.
- (d) persons employed by and/or representing and/or acting on behalf of entities that have tendered for and/or have been awarded by us a professional services contract:
- Your name and surname.
  - Contact information including your e-mail address, telephone number and residential address.
  - Any other information that constitutes personal data under applicable law that you or your employer or entity you represent or principal supplies us with.
- (e) when you register for participation to any events and/or activities that we may organise, we may collect and process the following personal information about you:
- Your name and surname.
  - Contact information including your e-mail address, telephone number and residential address.
  - Any other information that constitutes personal data under applicable law that you may supply us with.

### **Legal bases to process your personal information**

We collect and process your personal information on the following legal basis(-es):

- (a) in order to perform our obligations in accordance with any contract that we may have with you or in order to take steps to enter into a contract with you; and/or
- (b) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data; and/or
- (c) you have given consent to the processing of your personal data for one or more specific purposes; and/or
- (d) processing is necessary for compliance with a legal obligation to which we are subject to; and/or

- (e) in reliance on any other applicable legal basis provided under applicable laws and regulations.

### **How do we process your personal information**

We process your personal information as follows:

- (a) We collect and process personal information that you voluntarily submit to us when you get in touch with us using the details provided at the “Contact Us” section of the Website in order to enable us to carry out and perform any request or enquiry of yours;
- (b) We collect and process personal information that you voluntarily submit to us when you respond to a vacancy published on the Website or through the LinkedIn in order to enable us to carry out and perform a request made by you to us, and/or for recruitment purposes, and/or to assess your suitability for any position for which you may have submitted an application for employment with us and/or to ensure that we provide equal opportunities to all of our prospective employees.
- (c) We collect and process personal information that you or your employer or principal or entity that you represent supplies us with in order to perform our obligations and exercise our rights against your employer or principal or entity you represent. (d) We collect and process personal information that you voluntarily submit to us when you register for participation to any events and/or activities that may be organised by us in order to enable us to facilitate your participation to such event and/or activity.

We do not use your personal information for any commercial purposes and, unless expressly herein provided, we will not transfer your personal information to third parties for any other purpose without your explicit consent.

### **Retention period**

All personal information collected and processed by us is retained as follows:

- (a) *When you get in touch with us using the details provided at the “Contact Us” section of the Website*

Subject to any further lawful processing (including, without limitation, your consent to us to retain such information, and/or requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of persons that have gotten in touch with us using the details provided at the “Contact Us” section of the Website will be securely deleted or destroyed following completion or fulfilment of any request that you submit to us or, if no such request is submitted, with the end of the relevant communication between us and you.

- (b) *When you respond to a vacancy and apply for employment with us*

Subject to any further lawful processing (including, without limitation, your consent to us to retain such information, and/or requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of prospective

employees will be securely deleted or destroyed following an unsuccessful application for employment.

- (c) *When you are employed by and/or represent and/or act on behalf of entities that have tendered for and/or have been awarded by us a professional services contract*

Subject to any further lawful processing (including, without limitation, your consent to us to retain such information, and/or requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of persons employed by and/or representing and/or acting on behalf of entities that have tendered for or have been awarded by us a professional services contract will be retained for at least six years from the date of our last interaction with such employer or entity you represent or principal.

- (d) *When you register for participation to any events and/or activities that we may organise*

Personal information of persons that have registered for participation to any events and/or activities that we may organise will be securely deleted or destroyed once we receive a request to unsubscribe/opt-out from such processing by a person who has registered with us through e-mail at [info@chc.com.cy](mailto:info@chc.com.cy)

Retention of your information and subsequent deletion, destruction or storing (if and to the extent applicable) in a manner that we no longer can use such information, will be in compliance with applicable laws and regulations.

### **Your rights**

You have the following rights with regard to processing by us of your personal information and can exercise the same in accordance with applicable law:

- You can request access to your personal information and details thereof (including, without limitation, what type of personal information is processed and how).
- You can request rectification of inaccurate personal information concerning you.
- You can request deletion of your personal information. We are not required to comply with your request to delete your personal information if the processing of such information is necessary for us to comply with a legal obligation; or for us to establish, exercise or defend a legal claim. There are certain other circumstances in which we are not required to comply with your deletion request, although these two are the most likely circumstances in which we would deny that request.
- You can request the restriction of processing of your personal information unless such processing is required for us to comply with a legal obligation or for us to establish, exercise or defend a legal claim or unless we are required to do so by law.
- You can object to the processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.
- You can request to receive your personal data in a portable format where processing is based on your consent or on the performance of a contract with you; and such processing is carried out by automated means, you have the right to ask us to provide your personal information in

a structured, commonly used and machine readable format and to transmit, where technically feasible, such information to another controller without hindrance.

- In those cases where processing is based on your consent only and no other legal basis applies e.g. legitimate interests or necessary for the performance of a contract, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

In case your contact with us did not sufficiently address your request or would like to file a complaint with regard to how we handle your personal information, you may report such issue with the Office of the Commissioner for the Protection of Personal Data.

### **Confidentiality and security**

We are committed to ensuring that your personal information is and remains secure and confidential. In order to prevent unauthorised access, use or disclosure of your personal information, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that we collect. Our security technologies and procedures are regularly reviewed to ensure that they are up to date and effective. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and applicable law and regulations.

Information you provide to us is stored on our secure servers that are protected through access codes and a firewall. Unfortunately, the transmission of information via the internet is not completely secure. While we will take reasonable steps to protect all information submitted to us and/or received by us in accordance with this Privacy Policy, we cannot, in any event, guarantee the security of any information transmitted to us via e-mail and as such any transmission is at your own risk.

Certain other information you provide to us in paper form is stored in designated secure spaces within our premises where no unauthorised access is permitted.

All of our partners, employees, consultants, workers and data processors, who have access to, and are associated with the processing of your personal information, are obliged to respect the confidentiality and security of such personal information.

### **Who do we share your personal information with**

Generally, any personal information that we collect or that you provide us with will not be shared with any third party. However, there may be instances where we may need to share such personal information with a third party, including, without limitation, as follows:

- (a) Third parties to whom we outsource certain services, including, without limitation, document processing and translation services, IT systems or software providers, IT support service providers, document and information storage providers.
- (b) Third party postal or courier providers who assist us in delivering our documents related to a matter that concerns you.
- (c) Third parties that are involved with or are otherwise engaged by us for the purposes of evaluating and/or awarding a contract for the provision of professional services and/or



negotiating such contract and/or performing and/or facilitating such contract, including, without limitation, legal advisors, financial advisors, banks etc.

- (d) Third parties that may be hosting or co-organising or assisting us with setting up, organising and running events and/or activities that you have register with us to participate in.

The above is a non-exhaustive list of persons and entities with whom we may share your personal information.

When doing any of the above, we will comply with our legal and regulatory obligations in relation to your personal information, including, without limitation, maintaining appropriate safeguards in place.

### **Changes to the Privacy Policy**

We may make changes to the Privacy Policy from time to time. To ensure that you are always aware of how we use your personal information we will update the Privacy Policy from time to time to reflect any changes to our processing of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements.

We encourage you to review the Privacy Policy periodically to be informed and stay up to date on how we use your personal information.

### **Contact**

If you have further questions regarding the use of your personal information by us or if you would like to receive additional information regarding this Privacy Policy or if you would like to exercise your rights set out in this Privacy Policy you may contact us at:

Address: 53 Strovolou Avenue, Victory Building, CY-2018 Strovolos, Nicosia, Cyprus

Tel: + 357 22 203880

Email: [info@chc.com.cy](mailto:info@chc.com.cy)

Contact Person: When contacting us, please ensure that you address your e-mail to or request that you speak to Mr Demetris Fessas.