

Privacy Notice - Business Customers, Suppliers and Business Partners

What does this Privacy Notice cover?

This notice sets out what personal data we collect, for what purposes and your rights in this respect.

This Privacy Notice provides information regarding the personal data which are processed by a company or companies within EcoOils that includes EcoOils Sdn Bhd, EcoOils (Negeri Sembilan)Sdn Bhd and PT EcoOils Jaya Indonesia ('EcoOils' or 'we') in relation to (i) individuals who work for, or on behalf of, or who are shareholders of our business customers ('Business Customers'), (ii) suppliers or vendors ('Suppliers'), (iii) business partners, , as well as investors and shareholders ('Business Partners'). Eco Group is part of the Shell Group of companies. You can find further information about how the Shell group protects personal data here: <https://www.shell.com.my/privacy.html>.

For individuals who require access to a EcoOils site on behalf of a Business Customer, Supplier or Business Partner you will be asked to provide additional information to enable you to be identified for health, safety and security purposes and to manage the relationship between EcoOils and the relevant Business Customer, Supplier or Business Partner. For further information please contact us at hr@ecooils.com.my.

For individuals who apply to work for EcoOils, or who attend a recruitment event or undertake an assessment please refer to the Privacy Notice available via hr@ecooils.com.my.

As well as this Privacy Notice, bespoke privacy notices and supplementary privacy statements may contain further information about how EcoOils is processing your personal data. In those instances, such privacy notices will be communicated to you separately. These privacy notices may vary among the countries in which we operate to reflect local practices and applicable law requirements.

This Privacy Notice explains **what** personal data are processed about you, **why** we are processing your personal data and for which purposes, **how long** we hold your personal data for, **how to access and update** your personal data, as well as the options you have regarding your personal data and **where to go for further information**.

Special Notice - if you are under 18 years old. Processing children's personal data

If personal data of children is gathered this requires consent of the parent or guardian.

Except in those cases where EcoOils organizes educational events specifically designed for children, we do not intentionally collect personal data of individuals under 18 years old. If you are under 18 years old (or a different age to reflect local legal requirement as communicated on the EcoOils website in your location) please do not send us your personal data for example, your name, address and email address. If you wish to contact EcoOils in a way which requires you to submit your personal data (such as for education or innovation events) please get your parent or guardian to do so on your behalf.

What personal data do we process about you? Collection of information

The categories of personal data we collect about you.

We process personal data from and in relation to individuals who are, or who work for or on behalf of or who are shareholders in our Business Customers, Suppliers, Business Partners in the following categories:

- Private contact information (such as name, postal or e-mail address, and phone number) only if necessary; or
- Business contact and other information (such as job title, department, name of organization and your dealings with EcoOils on behalf of yourself or the relevant Business Customer, Supplier, Business Partner).

Screening

In addition, in order to comply with legal and regulatory obligations, to protect the Shell Group assets and employees/contractors and specifically to ensure that the Shell Group, which includes EcoOils, can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening (pre-contract and on a periodic basis post-contract) on owners, shareholders and directors of our Business Customers, Suppliers and Business Partners. This screening takes place against publicly available, or government issued sanctions lists and media sources.

The screening does not involve profiling or automated decision making in relation to the counterparties or potential counterparties.

Who is responsible for any personal data collected?

PT EcoOils Jaya Indonesia, whose address is PT EcoOils Jaya Indonesia, Jl. Beta III, Kawasan Industri Maspion, Manyarsidomukti, Manyar, Kab. Gresik, Jawa Timur, Indonesia will be responsible for processing your personal data, either solely or jointly with its affiliates within the Shell group of companies.

For what purposes do we process your personal data?

We process personal data covered by this Privacy Notice for the following purposes:

- **Business execution** - including providing, researching, developing and improving products or services; concluding and executing agreements with Business Customers, Suppliers and Business Partners; recording and settling services, products and materials to and from an EcoOils company; managing relationships and marketing such as maintaining and promoting contact with existing and prospective customers, account management, customer service, and development, execution and analysis of market surveys and marketing strategies;
- **Organisation and management of the business** - including financial management, asset management, mergers, demergers, acquisitions and divestitures, implementation of controls, management reporting, analysis, internal audits and investigations;
- **Health, safety and security** - including protection of an individual's life or health, occupational health and safety, protection of EcoOils companies and staff, authentication of individual status and access rights; or
- **Legal and/or regulatory compliance** - including compliance with legal or regulatory requirements.

We may also process your personal data for a secondary purpose where it is closely related, such as:

- storing, deleting or anonymising personal data;
- fraud prevention, audits, investigations, dispute resolution or insurance purposes, litigation and defence of claims; or
- statistical, historical or scientific research.

Communication and marketing

You may receive offers on behalf of the relevant Business Customer, Supplier or Business Partner. On all occasions you will be given the opportunity to use the unsubscribe functionality through the different digital channels we use to interact with you.

Why do we process your personal data?

We will only process your personal data where we have a lawful basis to do so.

The personal data covered by this Privacy Notice are only processed:

- in order to take steps at the request of an individual prior to entering into a contract;
- where it is necessary to comply with a legal or regulatory obligation to which the relevant EcoOils company and/or Shell company/companies is subject to;
- where it is necessary for the purposes of the legitimate interests pursued by the relevant EcoOils company/companies, except where such interests are overridden by the interests or fundamental rights and freedoms of the individual/s; or
- (only if legally required) with the explicit consent of the individual.

In those cases where processing is based on consent, and subject to applicable local law which provides otherwise, you have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of consent.

Security of your personal data

EcoOils is committed to safeguarding your personal data.

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use. In particular, we may use encryption for some of our services, we apply authentication and verification process for access to EcoOils services and we regularly test, assess and evaluate the effectiveness of our security measures.

Who will we share your personal data with?

The personal data covered by this Privacy Notice are exclusively processed for the purposes referred to above and will only be shared on a strict need to know basis with:

- Other companies within the Shell group of companies;
- Authorized third party agents, service providers, external auditors and/or subcontractors of EcoOils and/or Shell; or
- A competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which the relevant EcoOils and/or Shell company/companies is subject to or as permitted by applicable local law.

Transfers of your personal data to other countries

Your personal data may be transferred outside of your country, subject to appropriate safeguards.

Where your personal data have been transferred to companies within the Shell group and/or to authorized third parties located outside of your country we take organizational, contractual and legal measures to ensure that your personal data are exclusively processed for the purposes mentioned above and that

adequate levels of protection have been implemented in order to safeguard your personal data. These measures include Binding Corporate Rules for transfers among the Shell group and contractual agreements which comply with local legal requirements for transfers to third parties. You can find a copy of Shell Binding Corporate Rules at www.shell.com.my/privacy.html or by contacting privacy-office-SI@shell.com.

What are the consequences of not providing your personal data?

Personal data gathered by EcoOils for these processes either directly or indirectly are required in order to:

- Fulfil legal requirements and/or which is required for entering into a contract with a counter-party and continuing to contract with that counter-party; or
- Maintain contact with Business Customers, Suppliers and Business Partners.

Failure to provide us with the information required will negatively affect our ability to communicate with you, or our ability to enter into a contract with a counter-party or continue to contract with a counter-party.

How long do we hold your personal data for?

EcoOils will only hold your personal data for a defined period of time.

With some exceptions which are explained in supplementary privacy statements, any personal data that are required for the purposes of conclusion and execution of agreements with Business Customers, Suppliers and Business Partners or for considering bids or tenders, will be held during the duration of the contractual relationship and up to 15 years after. For agreements which have a term of more than five years and for the purposes set out above, these agreements will be held for 35 years with effect from the commencement of the agreement.

In all other cases for the purposes set out above, including personal data gathered as part of any unsuccessful bids to EcoOils or which relates to the screening against publicly available or government issued sanctions lists and media sources, such personal data are held for no longer than 15 years after it was first gathered.

In all cases information may be held for (a) a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose) or (b) a shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate business purpose to retain it.

Your rights in relation to your personal data

Your rights and how to exercise them.

We aim to keep our information as accurate as possible. You can request:

- access to your personal data;
- correction or deletion of the personal data (but only where they are no longer required for a legitimate business purpose);
- that you no longer receive marketing communications on behalf of the relevant Business Customer, Supplier or Business Partner;
- that the processing of your personal data is restricted; and/or
- that you receive personal data that you have provided to EcoOils, in a structured, digital form to be transmitted to another party, if this is technically feasible.

To make any of these requests, please contact epp@ecoils.com.my

Who can you contact if you have a query, concern or complaint about your personal data?

If you have any issues, queries or complaints regarding the processing of your personal data please refer to the relevant EcoOils privacy notice in your location or alternatively you can contact epp@ecooils.com.my

You may also contact the Shell Group Chief Privacy Officer at Shell International B.V. The Hague, The Netherlands - Trade Register, No. 27155369 Correspondence: PO Box 162, 2501 AN, The Hague.

If you are unsatisfied with the handling of your personal data by Shell, then you have the right to lodge a complaint with the Malaysian Department of Personal Data Protection: Jabatan Perlindungan Data Peribadi, Aras 6, Kompleks Kementerian Komunikasi Digital, Lot 4G9, Persiaran Perdana, Presint 4, Pusat Pentadbiran Kerajaan Persekutuan, 62100 Putrajaya, Malaysia. Telephone: 03-8000 8000 Fax: 03-8911 7959 Email: webmaster@pdp.gov.my

In addition you can raise a complaint with the Dutch Data Protection Authority whose address is Autoriteit Persoonsgegevens, PO Box 93374, 2509AJ The Hague, The Netherlands
Please visit <https://autoriteitpersoonsgegevens.nl/en> for more information.

Changes to this Privacy Notice

This Privacy Notice may be changed over time. You are advised to regularly review this Privacy Notice for possible changes. This Privacy Notice was last updated in August 2023.