

ROTTERDAM-RIJN PIJPLEIDING

PRIVACY NOTICE

1 Introduction

Rotterdam-Rijn Pijpleiding (**RRP**, hereinafter also indicated as 'we' or 'us') is the operator of a pipeline system and facilitates transportation of crude oil and oil products through these pipelines. In the context of our activities, we collect, hold, use and/or otherwise process personal data. Based on applicable data protection and privacy laws (such as the General Data Protection Regulation), we qualify as a 'controller' with respect to the personal data that we process in this context.

RRP understands that your privacy is important and that you care about how your personal data is used. We respect and value your privacy and will only collect and use personal data in the manner and for the purposes as described in this document and in a manner that is consistent with our obligations and your rights under the applicable legislation and regulations.

2 Information about us

N.V. Rotterdam-Rijn Pijpleiding Maatschappij, registered in Rotterdam (the Netherlands) under company number 27059206 and having its registered office and trading address at Butaanweg 215, 3196 KC Vondelingenplaat Rotterdam.

3 What does this Privacy Notice cover and whose personal data do we process?

This Privacy Notice is intended to ensure compliance with European privacy legislation and regulations, including but not limited to, the General Data Protection Regulation ("**GDPR**"). This Privacy Notice is relevant for anyone whose personal data we may process in the context of our (business) activities, including but not limited to:

- landowners on whose property our pipelines are located;
- directors, authorized representatives, employees and/or (other) contact persons of our current and former contracting parties, suppliers, affiliates and business partners;
- directors, authorized representatives, employees and/or (other) contact persons of our current and former professional advisers, consultants and service providers.

This Privacy Notice does not cover our activities with respect to job applicants.

This Privacy Notice explains what personal data we process, on what legal basis we may process your personal data and:

- what personal data we collect;
- for what purposes and how we may use/process the personal data;
- how we collect the personal data;
- how we store the personal data;
- for what period we store the personal data; and
- what your rights are under the applicable data protection and privacy legislation.

The term '**personal data**' is defined by the GDPR as "*any information relating to an identified or identifiable natural person ('data subject')*". Personal data are, in simple terms, all types of information about you on the basis of which you can (directly or indirectly) be identified. Personal data cover obvious personal information, such as your name and contact details, but it also covers less obvious personal data, such as tax identification numbers. The types of personal data that we process are set out in paragraph 4 below.

In view hereof, we encourage you to carefully read this Privacy Notice. From time to time, we may need to update this Privacy Notice. This may be necessary, for example, if the law changes or if we change our business (processes) in a way that affects the way we process personal data. In the event that the Privacy Notice will materially and/or substantially change, we will actively inform you of this change and provide you with the new version of the Privacy Notice.

The most recent version of this Privacy Notice will always be available on our website <https://www.rrpweb.nl/en/>. You may also ask us to send you a copy of the most recent version of this Privacy Notice.

Note: Where you provide personal data to us, which personal data relate to another individual than yourself (for example of the legal representative of the company you are representing), please provide the concerned individual with (a copy of) this Privacy Notice before providing us with his/her personal data.

4 What personal data do we collect and how do we collect this personal data?

If we collect your personal data, we may collect information about you in various ways:

- Directly from you, for example when you provide us with your personal information by email or business card;
- From third parties, for example when we receive your contact details from one of your colleague(s);
- From public sources such as the land registry, the trade register or your own website;
- By means of camera surveillance at our property.

We may collect or process some or all of the following personal data:

- Names
- Contact details, including but not limited to addresses, telephone numbers and email addresses
- Signatures
- Excerpts of registers and the personal data that are included in these excerpts and/or registers (public or not, for example excerpts from the Chamber of Commerce and the land registry)
- Payment information/bank account details
- Business/company information
- Position/job title
- Camera images (for security purposes)
- ID information when visiting the office buildings of RRP

5 Legal grounds and purposes for processing

We will only process the personal data described above for the following purposes and on the following legal grounds.

- Where the processing is necessary for compliance with a legal obligation, such as tax laws, or in case we have to meet requirements and orders of (regulatory) authorities.
- Where the processing is necessary to comply with our (pre-)contractual obligations towards you or the company you work for (for example to pay you compensation for the presence of a pipeline valve station on your territory, or to send you our invoices).
- for our legitimate business interests, such as: contacting you, communicating with you (for example via email correspondence or telephone), collecting our debts, for administration purposes, business continuity purposes, the performance of (internal or external) audits, to protect our assets, business and personnel (for example where we collect personal data by means of our visitor registration and camera surveillance at our facilities, near the pipelines and at our office buildings), to manage (possible) disputes and to establish, defend and exercise our (legal) position.
- If any kind of processing is based on your consent, we hereby inform you that you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

6 How long will we keep your personal data?

We retain your personal data in accordance with our internal data retention policy.

We will not store or keep your personal data for a longer period than is necessary in light of the purposes for which we process them (we refer to the purposes as listed above in paragraph 5). For example, we will store personal data that is processed in the context of a contract for the duration of the relevant contractual period and during the statutory limitation period for any potential (non-)contractual claims that may arise from that contract. Only where we are legally obliged to, or where this is necessary for defending our interests in the context of claims or judicial proceedings, we will store the personal data for longer periods.

If you have any specific question in this respect, please feel free to contact us.

7 How do we protect your personal data?

We will implement the necessary administrative, technical and organizational measures to ensure a level of security that is appropriate to the specific risks that we have identified. We protect your personal data against destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed.

Further, we seek to ensure that we keep your personal data accurate and up to date. However, you are responsible for this and we kindly request that you inform us of any changes to your personal data (such as a change in your contact details).

8 Do we transfer and/or share your personal data?

In the context of the purposes as listed above, we may share your personal data with third parties in the following situations.

- Specifically with regard to landowners:
 - In case of an emergency concerning RRP's pipelines, we may be legally required to share your personal data with competent authorities;
 - We may share your personal data with our service and maintenance providers in case we will need to carry out maintenance or repair works on the pipeline which requires us to access your property.
- In some limited circumstances, we may be (legally) required to share certain personal data, which might include yours, if we are involved in legal proceedings or when we have to comply with legal obligations, a court order, or instructions of insurers or a government authority such as data protection authorities.
- We may engage third parties to process the personal data on our behalf (for example providers of certain IT applications that we use in the context of our activities). We will enter into the required contractual arrangements with those parties to ensure lawful and fair processing of your personal data on our behalf.
- We engage third parties to perform security services on our behalf. This includes camera surveillance of our office buildings, facilities and the pipeline infrastructure. These parties may have access to camera images and these images and other security related information can be provided to law enforcement agencies, where relevant.
- We may also transfer personal data to third parties in the event of a (possible) sale or transfer of all or any part of RRP, if this is required in the context of that transaction.
- Where necessary, and to the extent permitted by law, we may provide your personal data to other external parties, such as advisors, insurers, bailiffs, or (external) auditors or affiliates.

Where relevant, we will implement safeguards to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

As a general rule, we do not share your personal data as set out above with other parties located in countries outside the EU.

9 Can I access my personal data?

If you want to know what personal data we have of you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a 'data subject access request'. All such requests should be made in writing and sent to the email or postal addresses shown in paragraph 12 below. In principle, there is no charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make unnecessary repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month after receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months after the date on which we received your request. In this case you will, of course, be kept fully informed of our progress.

10 What are your other rights?

Under certain circumstances you have the right to:

- receive additional information regarding the processing of your personal data;
- rectify your personal data;
- the erasure of your personal data;
- **object to (part of) the processing of your personal data;**
- the restriction of (part of) the processing of your personal data; and
- data portability (receive your personal data in a structured, commonly used and machine readable format and to (have) transmit(ted) your personal data to another organization).

Finally you also have the right to lodge a complaint to your local data protection authority.

11 Automated decision making and profiling

We do not undertake any automated decision making or profiling.

12 Contact details

To contact us about anything related to your personal data and/or data protection, including exercising your data subject rights as discussed above in paragraphs 9 and 10, in particular your right to object, please use the contact details below:

For the attention of:	Manager QHSSE
Email address:	info@rrpweb.nl
Telephone number:	010-2958444
Postal Address:	Butaanweg 215; 3196 KC Vondelingenplaat Rt. P.o. Box 490;3190 AK Hoogvliet