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## General Information

Golder Associates (UK) Ltd, its parent company and affiliates (collectively, “Golder”), are committed to protecting the privacy of Golder’s business partners (“Client”) that are licensed to use Golder’s FracMan DFN software (“the Software”), and Golder’s Client’s end users which have access to any of the data resources associated with Golder’s Software (“End Users”).

Golder encourages the Client and the Client’s End Users to read this FracMan DFN Software Privacy Policy (“Privacy Policy”) carefully and use it to make informed decisions. By using the Software, the Client agrees to the terms of this Privacy Policy, and the Client’s continued use of the Software constitutes the Client’s ongoing agreement to it.

## The Client’s Obligation

The Client shall ensure that all End Users have been informed of, and have given their consent to, Golder’s use and process of any information, as detailed in this Privacy Policy, to the extent such consent is required by applicable law.

## Which information does Golder collect?

Golder collects the following information when the Client or the Client’s End Users are using Golder’s Software:

- Individually identifiable information: Information identifying an individual or may with reasonable effort identify an individual (“Personal Information”), including the following:
  - Contact information (including name, address, telephone number, and email address); and
  - IP-Address of the computer on which the FracMan licence is activated.

This information is generally collected only at the time at which the license is first activated on the relevant End User’s computer.

- Client Information: Golder may collect contact information (including Personal Information) from the Client when the Client registers on Golder’s website, subscribes to Golder’s newsletter, register for an event, respond to a survey or complete a form.
- Unidentified and Non-Identifiable Information: This pertains to the Client or the Client’s End Users and may be made available or gathered via the Client’s use of the Software (“Non-Personal Information”). Golder is not aware of the identity of the user from which the Non-Personal Information was collected.
- Non-Personal Information and Technical Information: This is collected and transmitted by the Client’s device or the Client’s End Users’ devices, including certain software and hardware information such as the date on which the FracMan licence is activated.

Please note that when the Software is deployed by the Client, it is distributed via a FracMan installer download link, with the licence details being provided separately via email. Upon installation a licence activation process is initiated, in which the user’s computer connects to the Golder FracMan licence server and the licence details provided are verified against Golder’s records and access is either granted or refused. The licence activation process is only required at the time of software installation & activation.

### How does Golder use the information it collects?

Golder uses the Personal Information for legitimate business purposes only, such as:

- To set up the Client's account and to provide Golder's services to the Client and the Client's End Users;
- To authenticate End Users' access to the Software;
- To improve Golder's Software;
- To support and troubleshoot Golder's Software and to respond to queries; and
- To investigate violations and enforce Golder's policies, and as required by law, regulation or other governmental authority, to comply with a subpoena or similar legal process, or respond to a governmental request.

Golder uses the Personal Information only to the extent required and while maintaining the Client's right to privacy.

### With whom does Golder share the information it collects?

Golder does not rent, sell or share the Client's Personal Information with third parties except as described in this Privacy Policy.

Other than for the purposes set forth below, Client's and End User's Personal Information will not be transferred or disclosed outside Golder to other trusted third-party service providers or partners:

- Storing Personal Information on Golder's behalf (e.g. cloud computing service providers);
- Assisting Golder with its business operations and Software and improving it; and
- Performing research, technical diagnostics and analytics about the Software.

Golder may disclose Personal Information, or any information the Client submits via the Software if Golder has a good-faith belief that disclosure of such information is helpful or reasonably necessary to:

- Comply with any applicable law, regulation, legal process or governmental request;
- Enforce Golder's policies (including this Privacy Policy), including investigations of potential violations thereof;
- Investigate, detect, prevent or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- To establish or exercise Golder's rights to defend against legal claims;
- Prevent harm to the rights, property or safety of Golder, Golder's users, the Client or any third party; or
- For the purpose of collaborating with law enforcement agencies or in case Golder finds it necessary in order to enforce intellectual property or other legal rights.

Since Golder operates globally, it may be necessary to transfer Personal Information to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union. In these instances, Golder takes additional steps to ensure that a similar level of protection is given to Personal Information. The Client therefore consents to the transfer of the Client's and the Client's End Users' Personal Information to countries outside of the European Union.

### Third party information collection

Golder's policy only addresses the use and disclosure of information Golder collects from the Client and from the Client's End Users through the Software.

### How long does Golder retain the information it collects?

At any time, the Client or the Client's End Users may request to change, update, correct errors or delete Personal Information by emailing Golder at [infosec@golder.com](mailto:infosec@golder.com).

Please note that unless the Client instructs otherwise, Golder retains the information Golder collects for as long as needed to provide Golder's services and to comply with Golder's legal obligations, resolve disputes and enforce Golder's agreements.

Golder may rectify, replenish or remove incomplete or inaccurate information, at any time and at Golder's own discretion.

### How does Golder safeguard and transfer the Client's information?

Golder is committed to making reasonable efforts, in accordance with market best practices, to ensure the security, confidentiality and integrity of Personal Information. Golder takes care in implementing and maintaining the security of the Software and the Personal Information. Access to the Personal Information is based on data access minimisation and role-based access control, ensuring only authorised access to the Personal Information. Golder employs market best practice security measures to ensure the safety of the Client's End Users' Personal Information and prevents unauthorised use of any such information. Although Golder takes steps to safeguard such information, Golder cannot be responsible for the acts of those who gain unauthorised access or abuse Golder's Software, and Golder makes no warranty, express, implied or otherwise, that Golder will prevent such access. If a password is used to help protect the Client's accounts and Personal Information, it is the Client's responsibility to keep the password confidential.

### What are the Client's rights?

The Client may contact Golder at [infosec@golder.com](mailto:infosec@golder.com) any time and request:

- To access, delete, change or update any personal data relating to the Client (for example, if the Client believes that the Client's Personal Information is incorrect, the Client may ask to have it corrected); or
- That Golder will cease any further use of the Client's Personal Information or delete the Client's information (for example, the Client may ask that Golder stop using or sharing the Client's Personal Information with third parties).

If the Client wishes to raise a complaint regarding the manner in which Golder has handled the Client's Personal Information, the Client may contact us at the addresses indicated below.

### Minors

The Software is not designated to End Users under the age of 18, i.e., a Minor. If Golder has become aware that End Users Minors have shared any information, Golder will discard such information. If the Client has any reason to believe that a Minor has shared any information with Golder, they may contact Golder at [infosec@golder.com](mailto:infosec@golder.com).

### Updates or amendments to the Privacy Policy

Golder may revise this Privacy Policy from time to time, in Golder's sole discretion, and the most current version will always be posted on the FracMan webpage (<https://www.golder.com/fracman/>). Golder encourages the Client to review this Privacy Policy regularly for any changes. In the event of material changes, Golder will notify the Client through Golder's Software or by email.

The Client's continued use of the Software, following the notification of such amendments, constitutes the Client's acknowledgement of and consent to such amendments to the Privacy Policy and the Client's agreement to be bound by the terms of such amendments.

## How to contact Golder

If there are any questions regarding this Privacy Policy or the information that Golder collects about the Client, or if the Client feels that the Client's privacy was not treated in accordance with this Privacy Policy, the Client may contact Golder at [infosec@golder.com](mailto:infosec@golder.com).

Additional contacts:

Chief Information Security Officer  
Golder Associates (UK) Ltd  
Attenborough House  
Browns Lane Business Park  
Stanton-on-the-Wolds  
Nottinghamshire  
NG12 5BL, United Kingdom

If the Client is dissatisfied with Golder's response, the Client can contact the applicable data protection authority for the company affiliates for the purpose of the EU General Data Protection Regulations: <https://ico.org.uk/make-a-complaint/>.

Simon Copping

MANAGING DIRECTOR

19 June 2021