



Privacy Notice

What does this Privacy Notice cover?

This privacy notice provides information about personal data processed by companies within the Shell group of companies (“Shell” or “we”) in relation to submissions to the Shell Global Helpline.

This privacy notice explains what personal data is processed, for which purposes, how long we hold the personal data for, how to access personal data and where to go for further information. This includes any personal data relating to the person making a report as well as personal data about those individuals against whom an allegation has been made or those who have been identified as having information about the allegation.

For further information about how Shell processes your personal data other than through the Helpline please refer to the relevant privacy notice on www.shell.com/privacy.html.

This privacy notice is always subject to applicable local law.

What is the Shell Global Helpline (“Helpline”)?

The Shell Global Helpline is a way for employees, contract staff and external parties to report a suspected wrongdoing by or involving a Shell company, employee or contractor staff that is in violation of the Shell Code of Conduct and/or the Shell General Business Principles (<https://www.shell.com/about-us/our-values.html>).

Calls and on-line reports to the Helpline are received on behalf of Shell by an independent third-party specialist Helpline provider called Navex. Navex is based in the United States with servers located within various EU member states. We have taken the required organizational and contractual measures to ensure that any personal data gathered by Navex is adequately secured and processed for authorized Helpline purposes only.

What personal data do we process?

The personal data we collect through the Helpline will include:

- a) names, contact details and location of the individual making the report, of potential witnesses or individuals otherwise involved in the allegation, and/or of the person against whom the allegations are made,
- b) information that relates to the alleged behavior of an individual.

Unless prohibited by local law, individuals are encouraged to provide their name and personal contact details so that any submissions to the Helpline can be directly followed up on. Where you provide your name and personal contact details, your identity will be strictly confidential and will not be disclosed, to the person or people to whom the report relates unless you provide your consent. The only exceptions are where we are legally required to disclose your identity; where we are legally permitted to disclose your identity to protect or defend our rights or those of our employees, customers, suppliers or business partners, or where we have determined that the allegations were malicious and were made in bad faith.

We process information about the location of the individual making the submission and the location where the event took place so that any applicable local laws can be applied in gathering the information and undertaking any investigation.

Sensitive personal data

We may sometimes come into possession of sensitive personal data such as data relating to an individuals' health, racial or ethnic origin, religious or philosophical beliefs, or sexual orientation. This can occur where such data is included in a Helpline submission or where the data is strictly necessary as part of any investigation.

For what purpose do we process your personal data?

We may process your personal data:

- To administer the Helpline and assess and follow-up on submissions to the Helpline.
- To investigate alleged violations.
- To take any necessary follow up action upon the completion of an investigation.
- As part of the recruitment process for specific categories of high-risk positions, internal job applicants are screened against the application (enhanced personnel screening).
- To create anonymous reports for Shell management.

Who is responsible for any personal data collected?

Shell International B.V. will be responsible for processing your personal data on behalf of itself and its affiliates within the Shell group of companies.

Depending upon the location of the reporter, where the event is alleged to have taken place and the nature of the allegation(s), an investigator from an affiliate within the Shell Group will be asked to carry out the investigation.

Security of the personal data

Personal data may be transferred to companies within Shell and/or authorized third party agents, service providers, or subcontractors located in countries outside of your location (including outside of the European Economic Area). Where that happens, we take organizational, contractual and legal steps to ensure that personal data is exclusively processed for the purposes mentioned above and that your data privacy rights continue to be protected. These steps include Binding Corporate Rules for transfer among the Shell Group and approved mechanisms for transfers to third parties in countries not deemed to provide adequate level of data protection as well as any additional local legal requirements. You can request a copy of these by contacting privacy-office-SI@shell.com.

We have implemented technology and policies with the objective of protecting your personal data from unauthorized access and improper use and will update these measures as new technology becomes available, as appropriate.

Who has access to personal data?

Personal data is collected for the purposes referred to above (or for secondary purposes where it is closely related, for example such as storing it) and will only be shared on a strict need-to-know basis with:

- designated Shell staff, responsible for administering the Helpline.
- Shell staff responsible for investigating alleged wrongdoings reported through the Helpline and/or for taking the required measures to follow up any investigation, such as instituting disciplinary proceedings or legal proceedings.
- public authorities, government, regulatory or fiscal agencies where it is necessary to comply with a legal or regulatory obligation to which the relevant Shell company is subject to as permitted by applicable local law.
- authorized third party agents, service providers and/or subcontractors of Shell (including Navex, Global Inc who administers the Helpline on behalf of and under the direction and control of Shell).

How long do you hold the personal data for?

With some exceptions required to comply with local legal requirements, personal data collected in relation to a submission to the Helpline will be held for no longer than 10 years after conclusion of the investigation or, in case the Helpline submission did not lead to an investigation, no longer than 10 years after the Helpline report was received.

In all cases information will be held for:

- a) a longer period 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 reason),
or
- b) a shorter period where an individual objects to the processing of personal data and there is no longer a legitimate purpose to retain it.

Your rights in relation to your personal data

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

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

Please contact privacy-office-SI@shell.com.

When considering requests for access to personal data submitted in relation to the Helpline, Shell will consider the status of the requestor, the current stage of the investigation, and the nature of the information held as well as local legal requirements and restrictions.

How you can contact us

If you have any issues, queries or complaints regarding the processing of your personal data for the purposes of the Helpline you can contact Privacy-Office-SI@shell.com.

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 to your local data protection authority (if there is one) or the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2595 AJ 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. This Privacy Notice was last updated on 7 February 2023.

