

## Data Privacy Notice

### **Information about the data controller**

Safe2Talk is a confidential online reporting system provided by the Azule Energy group of companies ("**Azule Energy**"). In relation to the data that you will provide through Safe2Talk, Azule is the data controller and determines the purpose and means of data processing activities.

### **When to use Safe2Talk?**

Safe2Talk allows people to ask questions and/or report suspected violations of company policy or applicable laws and regulations. Use of Safe2Talk is entirely voluntary as you may use various other channels to report your concern internally (including speaking to your line manager, HR, Legal and Corporate Affairs). Only to the extent that you feel unable to use those channels you should use Safe2Talk. Please be aware that the information you provide about yourself, your colleagues, or any aspect of the company's operations may result in decisions that could affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and factual. Azule Energy has a strict non-retaliation policy for any report made in good faith, even if it later turns out to be incorrect. However, knowingly providing false or misleading information may result in consequences including disciplinary proceedings up to and including termination.

### **Sensitive data**

Please do not provide any sensitive data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a person's private life, sex life or sexual orientation, about yourself or another person, unless this information constitutes a key element of your report.

### **Collection and use of the personal data and legal basis for processing**

Safe2Talk invites you to submit: your name and contact details, the name and title of all individuals you may be reporting, and a description of the suspected violation, including all relevant facts and details. If you do not wish to provide us with your name, you may still report your concern through Safe2Talk. It is up to you whether you complete any field - to the extent that you explicitly and freely consent to the processing of your data as necessary to assess your submission and conducting any investigation as may be required. Your cooperation and assistance in such investigation may be necessary. If an investigation indicates that a violation of company policy or applicable laws or regulations has occurred, Azule Energy will take such action as it determines appropriate under the circumstances. Be aware that the processing of personal data shall be performed fairly and lawfully, with respect for the principle of good faith and adequacy of the processing of the data.

The personal data will be collected and processed for the purposes of investigating, analyzing and taking the necessary measures when Azule Energy receive reports/information regarding the violation or breach of Azule Energy's Code of Conduct or any legislation that may affect the safety of the employees or the business of Azule Energy and its affiliates.

The legal basis for the processing is your express consent, including for the cross-border transfer of your data, or data controller legitimate interests.

### **Recipients of your personal data and transfers of data**

The information you provide will be stored on servers hosted by NAVEX, an USA company ("**NAVEX**"), but the data will be stored in Germany and you expressly consent for such cross-border transfer of data. NAVEX in due course has adhered and implemented the adequate measures comply to the General Data Protection Regulation on the European Union. Unless otherwise required by law, the information within Safe2Talk may only be reviewed and used by those individuals who need to access the data to fulfill their job role. These individuals may include appropriate Azule Energy employees in the Legal and Corporate Affairs, Human Resources, Finance, IT and Audit functions, external Azule advisors retained to assist in investigating the report, or technical staff at NAVEX. Those individuals may be located in Germany or United Kingdom, which are countries that provide an adequate level of protection in accordance with Angolan data protection laws. In addition, subject always to Azule Energy's Binding Corporate Rules, some or all of the information you provide may be stored in Azule Energy's systems worldwide, including in countries that may not provide an adequate level of protection in accordance with Angolan data protection laws, in the course of answering your question(s) or investigating the report.

All of the foregoing individuals shall ensure all measures to protect personal data against unauthorized dissemination or access and any other form of unlawful processing.

### **Retention of your personal information**

Any information you submit that is not needed to answer your question or for any investigation may be deleted or rendered anonymous and archived, in accordance with Azule Energy's Records Management Policy. Once we have responded to your question or completed any investigation, all information will be similarly deleted or archived. Azule Energy will take appropriate technical, organizational, and legal steps to secure the information you provide.

### **Data subject's rights**

In relation to your personal data which you choose to provide us, you are entitled to:

- Access and review a copy of your personal data.
- Have any incomplete or inaccurate personal data corrected.
- Ask for deletion of your personal data by withdrawing your consent to its continued retention.
- Oppose the processing of your data when there are relevant and legitimate taking into account your specific case.

Please note that your exercise of these rights may be subject to certain exemptions, namely exemptions based on legal grounds.

### **Individual's right to lodge a complaint with Angolan data protection agency**

keep in mind that you also have a right to lodge a complaint with the Angolan Data Protection Agency in relation to the processing of your data. However, you should first think about using Azure Energy's channel (including, but not limited to HR and Legal and Corporate Affairs) to resolve any queries that you may have, before submitting a complaint before the authorities.