



PERSONAL DATA PROTECTION POLICY

POLICY

Date: 01 July 2024



CC-GBL-002 – Data Privacy Policy

Issued on: 01 July 2024	Supersedes: All prior
Owner: Compliance Department Signed by: Rhibetnan Yaktal – Global Head of Compliance	Approved by: Puma Energy Board Signed by: Hadi Hallouche - CEO

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1. Introduction

Data protection laws places obligations on Puma Energy to handle Personal Data fairly and to respect their rights regarding their Personal Data. Puma Energy also sets out in our [Code of Conduct](#) the minimum standards that must be applied with respect to data protection. Across Puma Energy the higher standard of either the law or the Code of Conduct must be applied.

2. Purpose

This policy sets out how to handle personal data fairly across Puma Energy globally and how to respect their right to understand and, in some cases, control how their data is used.

3. Scope

This Policy applies to all departments and staff, including temporary employees and any third-party personnel who have access to **Personal Data** used or processed by Puma Energy.

This Policy applies to **Personal Data** - not to confidential information which is not **Personal Data**, e.g. **Commercial or Financial Information**.

4. Policy

Puma Energy is committed to protecting the privacy of Personal Data of its employees, customers, business partners, and other individuals. We established principles and this policy to establish and maintain high standards collecting, using, disclosing, transferring, or otherwise processing Personal Data. This Personal Data Protection Policy describes Puma’s approach for handling and processing Personal Data worldwide. It applies globally to Personal Data that Puma processes, whether by electronic or non-electronic means (i.e., in hard copy, paper, or analogue form). This Policy applies to any Personal Data processing that is done for or by Puma.

Failure to comply with this Policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions up to and including termination.

5. Abbreviations and Definitions

Personal Data	Information which relates to an identifiable individual (i.e. a natural person), including: names, addresses, email addresses, job applications, photographs, employment records, bank details and correspondence to and from an individual, etc. including, where it can be linked to an individual, web browsing information (cookie data) and IP addresses.
Sensitive Personal Data	Personal data revealing a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership; biometric or



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	genetic information; or information about a person’s health, sex life or sexual orientation.
Commercial or Financial Information	Information which is important to the commercial interests of the company. For example, pricing data, research plans and reports, systems, policies, designs, product data, source codes, prototypes, formulas and acquisition data. This information is regulated by the Puma Energy Confidentiality policy.
Processing	Doing anything with personal data, including collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, transferring it, even deleting it.

6. Annexure

Annexure A	Potentially high-risk data
Annexure B	Data Protection Impact Assessment Template

7. Standards

Personal Data Protection Requirements

Fairness and Transparency

We should give people information about how we use their **Personal Data** and not do anything which they would not expect or we would be embarrassed for them to know about.

We should also tell people if their **Personal Data** will be passed to a third party and make sure the individual knows as soon as we can, if we receive **Personal Data** about her/him.

Lawful Processing

Puma Energy should only process **Personal Data** if it can satisfy at least one of the conditions set out in data protection laws, for example:

- a) The individual has consented to Puma Energy **processing** their **Personal Data**.
- b) The **processing** is necessary for a contract with the individual, e.g. with a consultant.
- c) The **processing** is necessary to comply with a legal obligation.
- d) The **processing** is necessary for Puma Energy’s (or a third party’s) legitimate interests, which are not overridden by any risk or harm to the individuals e.g. Puma Energy or its third parties will need to process its employees’ **Personal Data** in order to manage their benefits, etc.

Puma shall implement appropriate and reasonable physical, technical, and organizational measures to safeguard Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, use, or access. Puma shall instruct and contractually require third parties processing Personal Data



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on behalf of Puma, if any, to process it only for purposes consistent with Puma’s purpose(s) for processing and to implement appropriate physical, technical, and organizational measures to safeguard the Personal Data.

Puma Energy should only process **Sensitive Personal Data** (see definition below) in exceptional circumstances.

Purpose Limitation

We should always have a clear, lawful, and specific purpose before we collect any **Personal Data**.

If we later want to use the **Personal Data** for a new or different purpose or share it with a new third party, we should consider whether it is compatible with the original purpose and obtain consent.

Before starting any new **processing** of data, you should speak to the Puma Energy Data Protection Officer (DPO@pumaenergy.com). Where there could be high risks (see Appendix 1), Puma Energy will conduct a Data Protection Impact Assessment (Appendix 2) to decide whether we need any safeguards in place to protect the Personal Data

Data Minimisation

Puma Energy will only collect or process as much **Personal Data** as it needs. Before asking for **Personal Data** you should consider whether there is a legitimate purpose for having the **Personal Data**.

Accuracy

Individuals can access and correct their **Personal Data** and can take reasonable steps to delete their **Personal Data**.

All members of staff should inform HR about any changes in their **Personal Data**.

Retention

Personal Data that is no longer needed or has expired (for example a copy for an expired passport) should be deleted, or anonymised. This applies also to any **Personal Data** that members of staff may store locally for business purposes.

Security

We will protect **Personal Data** with appropriate security measures, to prevent any accidental or unauthorised access, damage, loss or disclosure. All members of staff should comply with our Data Retention, Data Management and IT Usage Policies.

Privacy By Design/Default

Privacy issues should be considered and addressed at the design phase of product and system development. Privacy protective functionality to appropriately limit data collection, processing, retention, and access must be designed into data driven technology. And, to the extent privacy options are available, the default setting should be the more privacy protective option.

Collection of Personal Data of Children



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If there is the need to collect data from minors, as defined by local legislations, Puma Energy will ensure that it has obtained the required consent.

Individual Rights

Anyone has the right to obtain a copy of their **Personal Data**, and to correct any inaccuracies. In certain circumstances, they have a right to have it erased or not used for a particular purpose.

Puma Energy will respond to requests in accordance with our legal obligations. It is entitled to refuse requests in certain circumstances.

If you receive a request from an individual relating to their **Personal Data**, you should consult with the Puma Energy Compliance Data Protection Officer (DPO@pumaenergy.com).

Personal Data Transfers

Personal Data transfer outside the European Economic Area (EEA) is only allowed if certain safeguards are in place. These restrictions apply whether Puma Energy is sending **Personal Data** to a third party or another group company, even if the **Personal Data** will only be accessed remotely from a non-EEA country.

You should consult the Puma Energy Data Protection Officer (DPO@pumaenergy.com) before sending **Personal Data** outside the EEA or allowing a non-EEA party to have access to our **Personal data** stored within the EEA.

Accountability

Puma Energy is responsible for ensuring our **processing of Personal Data** is compliant with the law.

Any new websites, apps, user functionality etc., should be designed to enable Puma Energy to comply with our Data Protection Principles.

The Puma Energy Data Protection Officer (DPO@pumaenergy.com) has overall responsibility for this program and will assist with the application of this Policy and any **Personal Data** protection queries.

This Policy will be periodically reviewed and updated as necessary to ensure that it is effective and meets Puma Energy's requirements.

8. Conclusion

If you become aware of any actual or suspected loss or breach of security relating to Personal Data, you should immediately report it to the Puma Energy Data Protection Officer (DPO@pumaenergy.com) or PumaEnergySpeakUp.com or compliance@pumaenergy.com



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Annexure A:

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Is the processing of Personal Data potentially ‘high risk’?

A DPIA is necessary where any processing of Personal Data **is likely to result in a ‘high risk’** to the rights and freedoms of individuals.

Therefore, all Employees are required, at the outset of any new project involving Personal Data, to consider whether the project has **the potential to involve ‘high risk’ processing**.

The processing activities below are examples of potentially ‘high risk’ situations. Please note that this list is not exhaustive and employees are expected to use their judgment:

Processing Activity	Examples
Sharing a significant amount of Personal Data with a third party	– <i>Appointing a supplier of a new HR system who will have access to Employment Data</i>
Collection of a new type of Personal Data	– <i>Collecting photographs in connection with the roll-out of a new internal instant messaging service</i>
Collection of a new type of Sensitive Personal Data, or using Sensitive Personal Data for a new purpose	– <i>Collecting Employee health data in connection with a new corporate healthcare insurance offering</i> – <i>Collecting fingerprints for a new building security system</i>
Using Personal Data for a new purpose	– <i>Using data collected from attendees at a Puma event for analytics purposes, or sharing the data with third parties</i>
Using Personal Data to make a decision about someone on an automated basis (even if there is a human review)	– <i>Using an automated programme to assess CVs in recruitment</i>
New collection or use of location data	– <i>Adding location tracking to an app used on Employee devices</i>
Sharing Sensitive Personal Data with a third party	– <i>Appointing a third party service provider who will have access to Employee occupational health data</i>
Conducting monitoring of individuals	– <i>Adopting a new CCTV system</i> – <i>Monitoring Employee use of an IT system (e.g. email monitoring, tracking websites visited etc.)</i>



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Combining datasets previously maintained separately	– <i>Combining business contact data collected from customers in different countries for the first time</i>
Transferring Personal Data overseas, other than as part of an existing processing arrangement already in place	– <i>Appointing a US service provider (e.g. a cloud provider or offshore call centre)</i>
Processing preventing individuals from exercising a right or using a service or a contract	– <i>Workplace related complaints that are kept confidential from the individual about whom the complaint has been made</i>

The following are examples of activities which are unlikely to be high risk in the absence of special circumstances:

- *‘Business as usual’ processing which Puma has been engaged in for several years, such as recording visitors, provided there is no material change in the processing.*
- *A cosmetic design change to an internal IT system that changes the order in which data is collected, but not the type of data collected (e.g. Changing look and feel of Workday).*
- *Ad hoc processing of a small amount of Personal Data in response to a specific request by an individual (e.g. in the context of a customer query).*
- *Disclosure or other processing of Employees’ business contact details.*



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Annexure B:

DATA PROTECTION IMPACT ASSESSMENT Template

PROJECT NAME:

PROJECT MANAGER:

PROJECT DESCRIPTION AND GOALS:

RESPONSIBLE DATA PROTECTION OFFICER:

DATE DPIA COMPLETED:

STEP (1): A DESCRIPTION OF THE PROCESSING	
Nature of the Personal Data	
Identity and approximate quantity of Data Subjects	
Nature of the processing	
Purpose and business objectives of the processing	
Identity and location of the parties	



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Other information		
STEP (2): WHY IS THERE A NEED FOR A DPIA?		
STEP (3): WHAT IS THE LEGAL BASIS FOR THE PROCESSING?		
STEP (4): WHAT ARE THE RISKS?		
Key Privacy Risks		
Likelihood and severity of any resulting harm		
Commercial or Legal risks to Puma		
STEP (5): SAFEGUARDS		
Risk	Proposed Safeguard / actions	Do the proposed safeguards / actions eliminate or reduce the risk or is the risk accepted?
STEP (6): ACTIONS		
Who is responsible for implementing proposed safeguards / actions?	Deadline for implementing safeguards / actions	
STEP (7): IS THE PROCESSING NECESSARY AND PROPORTIONATE?		



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[CONSULTATION WITH LEGAL AND/OR THE DATA PROTECTION AUTHORITY]

[DELETE IF NOT APPLICABLE]

APPROVAL OF DPIA

Role	Print Name	Signature	Date
Project Manager			
Data Protection Officer			



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