

Global Data Privacy Notice for Workers

1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. **It is important that you read all of this Notice carefully as it sets out how the Wood group of companies ("Wood", "we", "us" or "our") handle your personal information and the rights you have in connection with that information.** If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact us using the contact details set out at Section 11 below.

2. Scope

This Notice applies to all of Wood's workers. The term "**worker**" includes those who work on a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, consultants, professional advisors, secondees and interns. This Privacy Notice is relevant for all Wood workers. People working outside the European Economic Area and Canada may also have local arrangements which their P&O contacts and business managers will inform them about these from time to time. This notice is in compliance with any requirements pursuant to the Californian Consumer Privacy Act 2018 in relation to workers.

3. Types of personal information we collect and process

In the course of your employment at Wood, we may process personal information about you and your dependents, beneficiaries and other individuals whose personal information has been provided to us. As a responsible and trusted employer, we want all our workers to clearly understand the types of information we may process and purposes for doing so.

The types of personal information we may process include, but are not limited to:

- identification data - such as your name, gender, photograph, date of birth, worker IDs;
- contact details - such as home and business address, telephone/email addresses, emergency contact details;
- employment details - such as job title/position, office location, employment contract, performance, talent management and disciplinary records, grievance procedures, or medical /holiday records, details of actual or alleged incidents/violations/breaches of law, policies and procedures;
- background information - such as academic/professional qualifications, education, CV/résumé, criminal records data (for vetting purposes, where permissible and in accordance with applicable law);
- national identifiers - such as national ID/passport, immigration/visa status, social security numbers;
- family details - next of kin and dependents information, emergency contacts, marital status;
- financial information - such as banking details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants; and
- IT information - information required to provide access to company IT systems and networks such as IP addresses, log files and login information.



If you are a contingent worker, the types of personal information we process are limited to that needed to manage your particular work assignment with Wood and our internal business needs.

Sensitive personal information includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, or information about your health/sex life ("**Sensitive Personal Information**"). As a general rule, we try not to collect or process any Sensitive Personal Information about you, unless authorized by law or where necessary to comply with applicable laws, to investigate and manage actual or alleged violations of law.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate employment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to provide work-related accommodations, health and insurance benefits to you and your dependents, or to manage absences from work. *Please also see the Supplemental Privacy Notice in relation to coronavirus attached at the end of this notice.*

4. Purposes for processing personal information

Employment or work related purpose

We collect and process your personal information for the purpose of managing our employment or working relationship with you: for example, your employment records and contract information (so we can manage our employment relationship with you), your bank account and salary details (so we can pay you), your equity grants (for stock and benefits plans administration) and details of your spouse and dependents (for emergency contact and benefits purposes).

We process your personal information using many different IT systems. This will often involve transferring your personal information internationally to our servers or those of our third-party providers, but in either case, we will be responsible for ensuring that your personal information is adequately protected.

The Wood global directory

We maintain a global directory of our workers, which contains your professional contact details (such as your name, location, photo, job title and contact details). This information will be available to everyone in Wood to facilitate global cooperation, communication and teamwork.

Monitoring

We may monitor your use of Wood's IT resources, including telephone and computer systems, and any personal use of them, by automated software or otherwise. We also use access controls and CCTV to monitor workers and others on our premises. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

Other legitimate business purposes

We may also collect and use personal information when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and efficiently – for example, for general HR resourcing on a global level, IT security/management, forecasting assessment of performance, accounting purposes, or financial planning.

We may also process your personal information to investigate violations of law or breaches of our internal policies and procedures or in connection with the sale or purchase of business or assets.



Law-related purposes

We also may use your personal information where we consider it necessary for complying with laws and regulations, including collecting and disclosing worker personal information as required by law (e.g. for tax, health and safety, anti-discrimination laws), under judicial authorization, or to exercise or defend Wood's legal rights.

5. Who we share your personal information with

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

Transfers to other Wood companies

We will share your personal information with other Wood companies around the world in order to administer human resources, processing compensation and benefits, as well as for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

Transfers to third party service providers

We may make certain personal information available to third parties who provide services to us. We will only do so on a "need to know basis" and in accordance with applicable data privacy law.

For example, some personal information will be available to the providers of our Global HR system (Oracle), our IT business partner (IBM), our auditors and other outsourced service providers, such as our benefits administrators.

Transfers to other third parties

We may also disclose personal information to third parties on other lawful grounds, including:

- to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- to receive professional services from our professional advisors (including but not limited to tax, legal or other corporate advisors);
- to receive business services (including but not limited to services from third party suppliers, business partners and sub-contractors for business administration, support, processing, services, or IT purposes);
- in response to lawful requests by other individuals (e.g. other workers raising a data subject access request). We would carry out the balancing test required by law and weigh up your rights and the rights of the other person before deciding whether to do this;
- for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters (including but not limited to sharing with our regulators, law enforcement or fraud prevention agencies, as well as the, courts, the police and any other authorised bodies;
- in response to lawful requests by public authorities (including for national security or law enforcement purposes);
- as necessary to establish, exercise or defend against potential, threatened or actual litigation;



- where necessary to protect the vital interests of another person;
- in connection with the prospective or actual sale, assignment or other transfer of our business or assets (including to professional advisors and prospective or actual seller(s) or buyer(s)); and
- with your consent.

6. Legal basis for processing personal information

If you are a worker in the European Economic Area (“EEA”), our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (i.e. to administer an employment or work relationship with us), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If you are a worker outside of the EEA, in your particular jurisdiction similar rights may apply. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided at Section 11 below.

7. Transfer of personal information abroad

As we operate in markets around the world, we may need to transfer personal information to countries other than the ones in which the information was originally collected. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal information from the European Economic Area to a country outside it, such as the United States, we will implement an appropriate data export solution such as entering into EU standard contractual clauses with the data importer, or taking other measures to provide an adequate level of data protection under EU law

8. Data retention periods

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Data retention periods are set out in our Data Retention Policy. Where it is not specifically set out in the Data Retention Policy and except for the personal information needed to provide you with ongoing pensions or other benefits, your personal information will generally be retained for 7 years after the end of your employment or work relationship with us, to document the proper termination of your employment or work relationship (e.g. to tax authorities), to respond to employment or work-related inquiries, or to deal with any legal matters (e.g. judicial or disciplinary actions).

9. Your data privacy rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided at Section 11 below.



- In addition, if you are a resident of the European Economic Area, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided at Section 11 below. If you are a visitor from outside the EEA, similar rights might apply. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at subjectrights@woodplc.com.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available [here](#).

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

10. Updates to this notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. We will inform you of updates via an announcement in Wood News, and if the updates are material, we will also send a company wide email with an explanation of the changes.

11. Contact details

Please address any questions or requests relating to this Notice to privacy@woodplc.com, or alternatively, with your line manager, local P&O representative or Data Protection Officer for your region. Contact details for Wood's Data Protection Officers are available [here](#).

Name Lisa Deverick
Position Group Data Protection Officer
Date 26 March 2020



Supplemental Data Privacy Notice for Workers in relation to Coronavirus

1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. **This Notice provides additional information regarding how the Wood group of companies ("Wood", "we", "us" or "our") handles personal information collected as part of its response to Coronavirus and should be read alongside the Wood Worker Privacy Notice.**

Wood is committed to responding to the threat of Coronavirus safely. As part of its response it may need to collect additional information. At all times, Wood seeks to do this proportionately and taking into account your privacy and the public interest in protecting people's health.

2. Types of personal information we collect and process

In order to assist Wood to manage and minimize the risks from Coronavirus it may have additional requirements to collect your personal information. This may include collecting personal and home phone numbers, information about your state of health and the health of those you care for and live with.

Wood collects this information in order to ensure its performance of its contract with you, comply with health and safety legislation and in its legitimate business interests in order to ensure business continuity during the period during which Coronavirus presents a threat.

Where Wood processes special category information such as medical or health data it will do so in order to fulfil its health and safety obligations, for the purposes of carrying out its obligations in its employment contract with you, for reasons of public interest in the area of public health, such as protecting the cross-border spread of Coronavirus or it will seek your consent.

In some situations Wood may collect and share personal data about you to protect your or others' vital interests such as situations of extreme illness or urgent care.

Wood may need to share this personal data with contract counter-parties such as Shell so they can also manage and minimise risks from Coronavirus. When this is the case, only the minimum amount of personal information will be shared with as few people as necessary in order to fulfil its purpose with the requirement that appropriate technical and organizational measures are applied to protect it.

3. Data retention period

Wood will retain data collected in relation to Coronavirus for the duration of the outbreak or for less time, should it be appropriate, and then for as long as required in relation to the establishment, exercise or defence of legal claims.

4. Further Information and Contact details

For any other information regarding your privacy rights please refer to the [Wood Worker Privacy Notice](#)

Please address any questions or requests relating to this Notice to privacy@woodplc.com.

Lisa Deverick
Data Protection Officer
24 March 2020

