

CADOGAN PETROLEUM PLC

PRIVACY NOTICE

BACKGROUND:

Cadogan Petroleum PLC understands that your privacy is important to you and that you care about how your Personal Data (as defined below) is used and shared. We respect and value the privacy of everyone we work with and (subject to the limited exceptions in section 6, below) we do not collect Personal Data about you unless you contact us (see section 5, below). Any Personal Data we do collect will only be used as permitted by law.

Please read this privacy policy carefully.

1. Definitions and Interpretation

In this policy, the following terms shall have the following meanings:

“Personal Data” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means Personal Data about you that we hold and/or use. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“**GDPR**”); and

“we/us/our” means Cadogan Petroleum PLC.

2. Information About Us

2.1 Cadogan Petroleum PLC, a public limited company registered in England under company number 5718406, whose registered address is 60 Gracechurch Street London EC3V 0HR, is the **controller** of your Personal Data under the GDPR.

Our data protection manager is Shakespeare Martineau and can be contacted by email at info@shma.co.uk, by telephone on + 44 (0)20 7264 4444, or by post at 60 Gracechurch Street, London EC3V 0HR

3. What Does This Notice Cover?

This privacy policy applies only to your Personal Data held by us.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR:

- 4.1.1 The right to be informed about our collection and use of personal data;
- 4.1.2 The right of access to the Personal Data we hold about you (see section 8);
- 4.1.3 The right to rectification if any Personal Data we hold about you is inaccurate or incomplete (please contact us using the details in section 9);
- 4.1.4 The right to be forgotten – i.e. the right to ask us to delete any Personal Data we hold about you (we only hold your Personal Data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 9);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);
- 4.1.7 The right to object to us using your Personal Data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 9 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office (www.ico.org.uk).

5. What Data Do We Collect?

Depending upon how you contact us or we contact you, we may collect some or all of the following personal and non-personal data:

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name;
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as postcode, preferences, and interests;
- 5.9 financial information such as credit / debit card numbers;
- 5.10 tax number
- 5.11 IP address;

- 5.12 web browser type and version;
- 5.13 operating system; and
- 5.14 a list of URLs starting with a referring site, your activity on our website, and the site you exit to.

6. How Do We Use Your Data?

- 6.1 All Personal Data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your Personal Data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your Personal Data (e.g. by subscribing to emails (which you will always be able to opt out of)), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes. (The lawful basis (or bases) on which we use the data for these purposes is set out in brackets):
 - 6.2.1 Supplying our services to or otherwise doing business with you (please note that we require your Personal Data in order to enter into a contract with you) (in our legitimate interests or because necessary to perform a contract);
 - 6.2.2 Performing our obligations under a contract with you,
 - 6.2.3 Managing our relationship with you (performance of a contract);
 - 6.2.4 Operating and administering our business (legitimate interests);
 - 6.2.5 Fraud prevention, payment recovery, legal and regulatory compliance (legitimate interests, compliance with a legal obligation)
 - 6.2.6 Replying to emails from you (legitimate interests/performance of a contract);
 - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking the Unsubscribe link at the bottom of the email) (Consent).

7. How and Where Do We Store Your Data?

- 7.2 We only keep your Personal Data for as long as necessary to meet legal, regulatory and business requirements. You have certain rights to have your Personal Data erased or corrected (see section 4). Please inform us if you believe we hold inaccurate Personal Data about you.
- 7.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our website.

Steps we take to secure and protect your data include

 - 7.31 Passwords
 - 7.3.2 Firewalls

8. Do We Share Your Data?

- 8.1 We may share your data with any other companies in our group for administration,

compliance or tax. This includes any subsidiaries and/or holding company and its subsidiaries.

- 8.2 We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, delivery of services and search engine facilities. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 8.3 We may sometimes transfer your data from within the European Economic Area (EEA) to outside of the EEA, where the GDPR does not apply. In particular, we may transfer your Personal Data to our offices in Ukraine, where we carry out our administrative and financial operations. We may also sometimes transfer Personal Data to third parties (such as analytics providers and cloud storage companies) who process data outside the EEA. Where we do so we will take all reasonable steps to ensure that your data will be treated as safely and securely as it would be within the UK and under the GDPR. We will always take steps to ensure that any international transfer of information is managed carefully and in accordance with data protection law to protect your rights and interests. These measures include:
- 8.3.1 transfers of your personal data to countries which are recognised as providing an adequate level of legal protection for personal data;
 - 8.3.2 we have obtained the consent of data subjects to the international transfer of their personal data;
 - 8.3.3 transfers to organisations where we are satisfied about their data privacy and security standards and protected by contractual commitments such as signing the EU Standard Contractual Clauses and, where available, further assurances such as certification schemes; and
 - 8.3.4 if transferred to the United States of America, the transfer will be to organisations that are part of the Privacy Shield.
- 8.4 You have the right to ask us for more information about our safeguards. Please contact the Data Protection Manager (contact details in section 13)
- 8.5 We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you.
- 8.6 In certain circumstances, we may be legally required to share certain data held by us, which may include your Personal Data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or governmental authority.

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any Personal Data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy notice, be permitted to use that data only for the same purposes for which it was originally collected by us.

- 9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will, however, be given a choice to have your data deleted or withheld from the new owner or controller.

10. How Can You Control Your Data?

In addition to your rights under the GDPR, set out in section 4, when you submit Personal Data via our website or online, you may be given options to restrict our use of your data. [

11. How Can You Access Your Data?

You have the right to ask for a copy of any of your Personal Data held by us (where such data is held). Under the GDPR, no fee is payable. Please contact us for more details at info@cadoganpetroleum.com, or using the contact details below in section 13.

12. Our Use of Cookies and Analytics

Cookies

- 12.1 When you visit our website, we use cookies, which are small pieces of information that allow us to maintain your connection to our website. These cookies do not collect or store any personally identifiable information. You can refuse the use of cookies.

Google Analytics

- 12.2 Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

How to refuse the use of cookies

- 12.3 You may refuse the use of cookies by selecting the appropriate settings in your browser. However, if you do this you may lose some useful functionality such as personalisation and "keep me signed in" and "remember me" features.

13. Contacting Us

If you have any questions about our website or this privacy policy, please contact us by email at info@cadoganpetroleum.com, by telephone on +38 (044) 594-58-70, or by post at Cadogan Petroleum PLC, 48/50A Zhylyanska Street, BC "Prime", 8th floor, 01033 Kyiv, Ukraine. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 11, above).

14. **Changes to Our Privacy Notice**

We may change this privacy policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website, and you will be deemed to have accepted the terms of the privacy policy on your first use of our website following the alterations. We recommend that you check this page use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.