



Sensitive Data Protection Policy

Personal information of any individual working for or with SPT, as well as all confidential business information related to SPT are to be deemed sensitive data. This is based on the belief that the misuse of such information can have serious negative consequences for the individuals involved as well as for SPT. Therefore, it is important to treat sensitive data with utmost care; with the necessary precautions covering data collection, storage, access, transmission and use.

Our policy **objectives** and means are as follows:

- 1. Implementation and maintenance of IT security features to detect and prevent misuse of sensitive data**
 - a. Create a safe space in the company's network and portable drives to store, manage and exchange data.
 - b. Implement the necessary controls to manage access and use of safe space in the network drives.
 - c. Implement the necessary administrative, software and hardware defences to uphold the integrity of the company's IT systems.
 - d. Instruct our IT service provider to provide and enable the above-mentioned control measures

- 2. Development, implementation and maintenance of management system to regulate use of sensitive data**
 - a. Identify information that can be deemed as sensitive data and categorize same according to the risk of misuse.
 - b. Implement procedures and instructions to protect sensitive data from unauthorized collection, access, dissemination, alteration or deletion.
 - c. Implement procedures and instructions to detect, report & investigate the breach of data leak or misuse.

- 3. Improve awareness of data related security threat amongst staff**
 - a. Appointment of a Data Protection Officer (DPO) to implement policy objectives.
 - b. Supporting the DPO through the provision of resources for training, familiarization and the distribution of relevant information.

This policy is meant to facilitate the free flow of information, whilst protecting the rights of individuals, as well as the business competitiveness and trustworthiness of SPT. It addresses the General Data Protection Regulation instituted by the European Union.

Managing Director SPT Offshore

Date: 2021-01-15

Mark Riemers

A handwritten signature in black ink, appearing to read 'Mark Riemers', written over a horizontal dashed line.