



# Conrad Asia Energy Ltd

Company Number: 201026677K (incorporated in the Republic of Singapore)

Australian ARBN 656 246 678

## Privacy Policy

21 April 2022

# Privacy Policy

## Conrad Asia Energy Ltd (the Company) and its subsidiaries

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### 1. Background

#### 1.1 Overview

Conrad Asia Energy Ltd. and its subsidiaries (referred to herein as "Company", "us", "we" or "our") is committed to the processing of Personal Information we hold in accordance with this Privacy Policy. The Company endeavours to treat your Personal Information with the utmost care and has implemented appropriate measures to protect your Personal Information.

This Privacy Policy outlines the manner in which we collect, store, use and disclose Personal Information. The Privacy Policy sets out the basis upon which the Company meets the requirements of applicable Personal Data protection or privacy laws (including the Personal Data Protection Act 2012 of Singapore ("PDPA")).

"Personal Information" or "Personal Data" refers to any data/information (including opinions), whether true or not, about an individual who can be identified (a) from that data/information; or (b) from that data/information and other information to which we have or are likely to have access, including data in our records as may be updated from time to time. Examples include your personal particulars, employment details, educational qualifications, billing and payment details, and other information about your use of the Company's websites or for job applications.

By interacting with the Company or providing your Personal Information to the Company, you hereby agree and consent to the Company collecting, using, disclosing and/or sharing such Personal Information with the Company's affiliates, authorised service providers and relevant third parties in the manner and for any of the purposes set forth in this Privacy Policy. In addition, this Privacy Policy will also provide you with more information on the basis upon which we may lawfully process your Personal Information without your consent, where permitted by applicable law.

This Privacy Policy is consistent with and supports the Company's values as referred to on its website which may be accessed at <https://www.conradpetro.com/sustainability#Governance>.

#### 1.2 Purpose

The purpose of this Privacy Policy is to:

- (a) ensure that the Company, as a minimum, complies with its obligations under Singapore law, the Corporations Act 2001 (Cth), the ASX Listing Rules and ASX Corporate Governance framework and as much as possible seeks to achieve and exceed best practice;
- (b) educate all Company stakeholders as to how the Company manages the privacy of Personal Data;
- (c) ensure the Company complies with applicable Personal Data protection or privacy laws; and
- (d) promote stakeholder confidence in the integrity of the Company and its securities.

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## 2. Scope

### 2.1 General

This Privacy Policy applies to any Personal Data that the Company collects, uses and/or discloses. Associated entities of the Company are encouraged to adopt this Privacy Policy.

In this Privacy Policy, a "third party" includes any individual or organisation interacted with in the course of the Company's related work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This Privacy Policy should be considered alongside the other Company corporate governance policies. These policies can be accessed and downloaded from the Company website at the following link: <https://www.conradpetro.com/sustainability#Governance>.

### 2.2 Application

The Company currently operates in Singapore, Australia, and Indonesia. Currently there are privacy laws in Singapore, Australia and Indonesia including the PDPA, the Australian Privacy Act 1988 (Cth) and various State acts and the expected Personal Data Protection Law (PDP Law - making its way through Indonesian Parliament) which the Company is subject to. If the Company expands its operations to other jurisdictions, other laws may apply as well.

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## 3. How We Collect Your Personal Information

Generally, the type of Personal Information we collect about you includes your name, mailing address, telephone number and e-mail address. We collect Personal Information in the following ways:

- when you submit any form or provide us with other documentation or information in respect of your interactions and transactions with us, or when you use our services;
- when you use our electronic services, or interact with us via our websites and platforms or use services and/or features on our websites and platforms;
- when you interact with our staff and representatives, for example, via telephone calls (which may be recorded), letters, fax, face-to-face meetings and email;
- when we seek information about you and receive your Personal Data in connection with your relationship with us, including for our services and/or job applications, for example, from business partners, public agencies, your ex-employer and the relevant authorities;
- when you submit an employment application or when you provide documents or information including your resume and/or curriculum vitae in connection with any appointment or position;
- when you request that we contact you, be included in an email or other mailing list, or when you respond to our request for additional Personal Data; and/or
- when you submit your Personal Data to us for any other reason.

We may also collect sensitive information about you such as employment application details or health information. We will only collect sensitive information in limited circumstances including where:

- you have consented to it;

- the collection is required by law;
- you applied for a job with us; and/or
- you are employed by us.

There may be occasions when we need to source Personal Information about you from a third party. For example, we may collect Personal Information from a company for whom you previously worked for, other organisations with whom you have any dealings, a credit reporting agency, an information service provider or from a publicly maintained record.

We do not disclose information about your individual visits to the Company's website, or Personal Information that you provide, such as your name, address, email address, telephone number, etc., to any outside parties, except as set out in this Privacy Policy.

If an employment position to which you are applying for is in a country other than Singapore, by submitting your application to us, you hereby agree and consent to your personal details being forwarded to our offices in that country.

If you provide us with any Personal Information relating to a third party, by submitting such information to us, you represent to us that you have obtained the consent of the third party at the time of disclosure, for the disclosure of third party's Personal Information to us, for our collection, use and/or disclosure of the Personal Information for the purposes contemplated under this Privacy Policy.

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## **4. How We Use or Disclose your Personal Information**

We may use and disclose Personal Information for the following purposes:

- to verify your identity and personal particulars;
- to manage the administrative and business operations of Company and complying with internal policies and procedures;
- for preventing, detecting and investigating crime, including fraud and money-laundering or terrorist financing, and analysing and managing commercial risks;
- in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- for managing and preparing reports on incidents and accidents;
- for management and/or evaluative purposes, including without limitation to process your employment application, to facilitate and conduct interviews, to conduct pre-recruitment checks (including employment reference checks, educational and professional qualifications verification, criminal history checks, disqualifications and bans, and residency status confirmation), to assess your suitability for a position applied for, processing staff referrals and/or to provide or obtain employee references or other references where relevant for background screening and/or vetting;
- for personnel administration, including to administer benefits and payroll processing, to administer or execute employee remuneration schemes, and/or to his/her employment-related work activities;
- to enter into an employment relationship with you or to appoint you to any office;

- to manage or terminate the employment relationship with you or appoint you, including without limitation role assessment, job compatibility assessment, career progression and/or management of staffing requirements;
- to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- for any other purpose relating to or reasonably necessary for any of the above.

If an employment applicant is unsuccessful, the Company may keep the application for a reasonable period, and review the application if a more suitable position emerges. If applicants do not want information held for this purpose, they should notify the Company on the employment application.

We engage third party contractors to perform services for us which involve the contractor handling Personal Information we hold. For example, we engage third party contractors to store and archive our completed files. Where we engage third party contractors to perform services for us, we prohibit the third-party contractor from using Personal Information about you except for the specific purpose for which we supply it.

Subject to applicable law, the Company may provide your Personal Information, for the purposes listed above (where applicable), to the following external entities and parties, whether they are located overseas or in Singapore:

- the Company's affiliates and related corporations;
- relevant government regulators, government ministries, statutory boards or authorities and/or law enforcement agencies, to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them;
- the Company's professional advisers such as our board of directors, auditors, accountants and lawyers;
- the Company's co-brand and other business partners;
- contractors or third party service providers (including software providers) who provide services to the Company;
- any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or any debt or asset sale) involving the Company;
- any agents acting on the Company's behalf; and/or
- any other party to whom you authorise us to disclose your Personal Data to.

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## **5. Deemed Consent**

In addition to the matters set forth above, subject to and in accordance with applicable law, you shall be deemed to have consented to the Company collecting, using and/or disclosing your Personal Data, and disclosing such Personal Data to the Company's authorised service providers and relevant third parties:

- (a) where in response to a request for your Personal Data in connection with identified purposes, you voluntarily provide such Personal Data to the Company for such purpose(s) and it is reasonable that you would voluntarily provide such Personal Data; and

- (a) where the collection, use and/or disclosure of your Personal Data is reasonably necessary for the conclusion and/or performance of a contract, between you and us or any other organisation entered into at your request, which may include recipients of your Personal Data not indicated in this Privacy Policy.

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## 6. Other Bases for Handling or Processing Your Personal Data

In addition to and without limiting the consents you have provided to our collection, use and/or disclosure of your Personal Data for the purposes set out elsewhere in this Privacy Policy, where permitted by applicable law, the Company may also in accordance with the requirements thereof also collect, use and/or disclose your Personal Data as further detailed below including without consent, where we meet the requirements of applicable law:

- (a) for our legitimate interests or the legitimate interests of another person (but not for sending you direct marketing messages unless you have otherwise provided your consent), including without limitation for the following purposes:
  - (i) any investigations or proceedings;
  - (ii) fraud detection and prevention;
  - (iii) entering into, managing or terminating an employment relationship or appointment; and
  - (iv) detection and prevention of misuse of services by users; and
- (b) we may collect your Personal Data from any of the Company's related corporations, we may use your Personal Data, and any of the Company's related corporations may disclose your Personal Data to us, for improving our products, services, processes or business, understanding customer preferences and personalizing experiences and recommendations (regardless whether you are an existing or prospective customer of the Company or any of its related corporations), as may be applicable.

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## 7. Gaining Access to Information We Hold About You

We will, on request, provide you with access to the Personal Information we hold about you unless there is an exception which applies under the applicable Personal Data protection or privacy laws such as where we have a legal duty of confidentiality or non-disclosure as mentioned above.

Your request to obtain access will be dealt with in a reasonable time. The Company may recover from you its reasonable cost of providing you with access.

If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the relevant Personal Data protection or privacy laws.

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## 8. Keeping Your Personal Information Up-to-date

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. As we generally rely on Personal Data provided by you (or your authorised representative), you should ensure that all Personal Information submitted and provided to us is complete, accurate, true and correct. In order to ensure that your Personal Data is current, complete and accurate, please update us if there are changes to your Personal Data by writing or via email at the contact details provided below.

If any of the Personal Information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will take reasonable steps to correct this information or, if necessary, we will discuss alternative action with you.

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## 9. Security of Your Personal Information

We protect any Personal Information that we hold from misuse and loss. We also protect it from unauthorised access, modification and disclosure.

Your Personal Information may be stored either in hard copy documents or as electronic data in the Company's software or systems.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

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## 10. Transfer of Personal Data Outside of Country of Information Collection

Save as specifically set out in this Privacy Policy, we generally do not transfer your Personal Data to countries outside of the country in which the information was originally gathered. However, there may be instances in which we transfer your Personal Data to recipients in countries including Singapore, Australia and Indonesia for one or more of the purposes outlined in this Privacy Policy. If we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the Personal Data protection or privacy laws of the country in which the information was originally gathered. If that country is Singapore, more information about the PDPA is available on the Personal Data Protection Commission's website at <https://www.pdpc.gov.sg/Overview-of-PDPA/The-Legislation/Personal-Data-Protection-Act>.

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## 11. Collection of Data in the Digital Sphere

Various technologies may be used on our website and web-based applications in order to make them more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's Personal Data. Examples of such technologies include:

**(a) Click-stream data.** A visit to one of our websites results in data that is transmitted from your browser to our server being automatically collected and stored by us or by third parties on behalf of us. This data can include, in particular, the following:

- the visitor's IP address;
- the date and time of the visit;
- the referral URL (the site from which the visitor has come);
- the pages visited on our website;
- information about the browser used (browser type and version, operating system, etc).

**(b) Cookies.** Cookies are a standard method for storing small pieces of data on a web client (i.e. the web browser on your computer). Any web server (including this one) may: store one or more cookies in your browser; or request your browser to transmit the data to the web server. The Company may send cookies to your computer while you are accessing the Company's websites or platforms.

By using cookies, websites can track information about visitors' usage of the site, provide customised content, or even the use of password protection. Note that some browsers can be configured to allow cookies to be accessed by servers other than the originating server.

Please note that most web browsers can also be configured to notify the user when a cookie is received, allowing you to either accept or reject it. If you do not agree to our use of cookies and other technologies as set out in this Privacy Policy, you should delete or disable the cookies associated with our websites and platforms by changing the settings on your browser accordingly. However, you may not be able to enter certain part(s) of our websites or platforms. This may also impact your user experience while on our websites or platforms.

- (c) **Web analytics.** Web analytics is the term given to a method for collecting and assessing the behaviour of visitors to websites and (mobile) applications. This includes the analysis of traffic patterns in order, for example, to determine the frequency of visits to certain parts of a website or (mobile) application, or to find out what information and services our visitors are most interested in. For these purposes, we primarily make use of click-stream data and the other techniques listed above. Web analytics are carried out by Google Analytics and/or other selected parties.

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## 12. Third Party Sites

Our website(s) may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website(s). We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third party websites to determine how they will handle any information they collect from you.

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## 13. Record Retention

Your Personal Information will not be kept longer than necessary or as permitted by applicable laws. In addition, your Personal Information that we possess will be destroyed, anonymised or de-identified as soon as it is reasonable to assume that such retention no longer serves the purpose for which the Personal Data was collected, and is no longer necessary for legal or business purposes. Please contact Company for more details about the retention period, the purpose of data retention and how we will destroy the Personal Data once the retention period is over.

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## 14. How to Contact Us

If you wish to gain access to your Personal Information or make a complaint about a breach of your privacy or if you have any query on how your Personal Information is collected or used or any other query relating to Company's Privacy Policy, please contact:

Telephone: +62 21 2272 2189

Email: [info@conradpetro.com](mailto:info@conradpetro.com)

Mail: 192 Waterloo Street, 05-01 Skyline Building, Singapore 187966

We will respond to your query as soon as possible.

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## 15. Other Matters

### 15.1 Amendment of Privacy Policy

From time to time, Company may review and update its Privacy Policy. Revised versions will apply to Company's handling of your Personal Information from the time it is updated on the website at the following link:

<https://www.conradpetro.com/sustainability#Governance>.



Insofar as consent is a basis of processing your personal data under relevant applicable law, you hereby agree and consent to the Company's collection, use and/or disclosure of your Personal Information in accordance with the prevailing terms of this Privacy Policy, as may be updated from time to time. We advise that you may wish to periodically review our Privacy Policy to keep up to date with any revisions that may from time to time take place.

## **15.2 Adoption of Privacy Policy and Company Review**

This Privacy Policy was adopted by Company on the date on the front cover of this Privacy Policy, and takes effect from that date and replaces any previous policy in this regard.

The Company reserves the right to review, update and/or modify this Privacy Policy periodically to ensure effective operation and assess whether any changes are necessary.

This Privacy Policy was last reviewed and updated on 21 April 2022.