DATA PROTECTION POLICY

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Responsibility for this document:	The functional responsibility for the development, review and maintenance of this document rests with the Data Protection Officer

Contents

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1 Purpose and Scope

The purpose of this policy is to set out the standards and expectations of Wood in respect of data protection and privacy laws and explain what you need to do to help Wood comply with these data protection laws when handling personal data of clients, contacts, suppliers and colleagues. Wood takes our obligations under these laws seriously and wants you to have a clear understanding of its importance.

All of Wood's employees and contingent workers ("you", "your") must comply with this policy.

Wood must comply with applicable data protection laws. In the EU data protection is currently governed by the European Data Protection Directive 1995 (which has been implemented into local laws in Europe). From 25 May 2018 this law will be replaced by the General Data Protection Regulation 2016 ("**GDPR**").

2 Roles and Responsibilities

The functional responsibility for the development, review and maintenance of this policy rests with the Data Protection Officer. All Wood business units must ensure that their management systems contain arrangements to address the requirements of this procedure.

3 Policy Requirements

3.1 Data Protection Law Breaches and Policy Breaches

A data protection breach can have a significant impact on a company's reputation. Besides reputational damage, organisations that breach data protection laws can be fined for breaches (levels of which vary from country to country). However, under the GDPR the level of fines have significantly increased. From 25 May 2018, fines could reach up to 4% of global annual turnover or €20 million, whichever is higher. In addition to regulatory fines, individuals can also bring a claim against Wood for a breach of their data protection rights.

Not all breaches will automatically result in fines, but as a responsible organisation we respect the personal data and data protection rights of all individuals.

All employees and contingent workers are expected to comply with this policy. Breaches of this policy will be taken seriously and may result in disciplinary action.

3.2 Overarching Data Protection Principles

As a global business operating in many markets we have adopted the following principles as an organisation to ensure we:

- are legally entitled to process the information under data protection law ("lawful grounds");
- are transparent with individuals about what personal information we process and why ("transparency");
- do not use personal information for any purpose other than for which it is collected ("purpose limitation");

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- collect the minimum personal information needed for the purpose it is collected ("minimisation");
- keep personal information accurate and up to date ("accuracy");
- respect an individual's data subject rights (see the Data Subject Rights Handling Policy for more information on these rights) ("data subject rights");
- keep personal information secure both when using internally and when sharing with third parties ("security");
- only transfer data outside of Europe (or allow access to it from outside of Europe) if we have put in place appropriate data transfer arrangements ("data transfers"); and
- build data protection compliance (i.e. compliance with the above principles) into any new project that involves personal information processing or new use of personal information ("data protection by design").

These privacy principles are often found in data protection laws around the world, including under the General Data Protection Regulation. Regardless of which country Wood operates in, we will apply these principles to all our personal information.

3.3 Complying With the Data Protection Principles

3.3.1 Lawful grounds to process personal information

We must only process personal information if permitted under data protection law to do so. The main grounds under these laws which permit us to process personal information are the following:

- To comply with a legal obligation (for example, as an employer we may be required to process certain information about employees);
- To protect the vital interests of the individual (for example, if there is a medical emergency);
- For performance of a contract with the individual or to perform steps prior to entering into a contract at the request of the data subject;
- For the legitimate interests of Wood or a third party but only if the individuals rights are not outweighed, for example, where the business benefit to Wood is limited but there would be significant intrusion on the privacy of the individual; and/or
- The individual has given their consent (although this should only be sought if one or more of the other ground above do not apply).

There are additional special grounds for processing data that is sensitive data or criminal records data. You should not collect or use any sensitive data or criminal records data unless this has been reviewed and approved by Compliance.

3.3.2 Relying on consent

Whenever relying on consent to process personal information we must make sure that consent is:

- Documented so we demonstrate we have obtained consent lawfully;

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- Given affirmatively (such as ticking a box or signing a document) – we cannot rely on 'inaction' as a way of obtaining consent (e.g., no pre-ticked boxes);
- Freely given and retractable at any time – it must be as easy to withdraw as to give consent; and
- Not 'tied' i.e. conditional on accepting services/offers.

3.3.3 Transparency, purpose limitation and minimisation

- When we collect personal data, we will only collect the minimal information necessary for the intended purpose of doing so. You should decide what personal information is necessary for the intended purpose.
- Before or as soon as possible after collecting any personal information we must give the relevant individual a privacy notice. A privacy notice must contain certain information. An example of a privacy notice is our website privacy notice.
- Data should only be retained for as long as necessary for the purpose it was collected. We must describe in privacy notices how long we intend to keep the personal information for the relevant purposes.
- If you have any questions about template privacy notices or need help creating a notice, please contact privacy@woodplc.com.
- If personal information is intended to be used for any purposes other than those which have been described to the individual in a privacy notice, this must be reviewed and approved by Compliance. Enquiries can be sent to privacy@woodplc.com.

3.3.4 Accuracy

- We must keep personal information accurate. This will mean, in each relevant context, considering how information will be regularly updated.
- This might, for example, be by self-service systems, regular verification exercises or by providing information to individuals so they know who to contact if their details change.

3.3.5 Data subject rights

- Individuals about whom we process personal information (including you) are entitled to exercise certain rights with respect to their own personal information. These rights are explained in the Data Subject Rights Handling Policy.
- If personal information of an individual is shared with a third party or a third party shares personal information with Wood, we are required to make sure that a mechanism is in place to communicate with each other about any requests to restrict, delete or correct personal information unless this would be impossible or involve disproportionate effort.

3.3.6 Security

- We must keep personal information secure and protect it from any unauthorised access, accidental loss, damage or destruction. You should ensure you are familiar with and follow our security policies and procedures which are designed to protect our IT

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systems, our premises and data within them (both confidential information and personal information).

- If personal information is collected for a particular purpose, always consider whether we could achieve the same purpose with anonymised data. If not, wherever possible personal information should be pseudonymised (i.e. masked, hashed or otherwise concealed) and/or encrypted. The more confidential the information the higher the security standards will need to be to protect it.
- Personal data should not be shared with anyone or any organisation (including other Wood group companies and to our service providers) unless appropriate contractual arrangements have been put in place or the disclosure is otherwise permitted under data protection law.
- If you need to share personal information outside of Wood, you should first verify that appropriate contractual arrangements are in place. This can be checked with privacy@woodplc.com.
- If no contract is in place, you can use our standard non-disclosure and data processing agreement with third party providers that process personal information on our behalf. If any other data sharing arrangements are needed, please contact privacy @woodplc.com.
- Before using any third party providers who will hold or have access to personal information on our behalf, we must first carry out due diligence to verify that they meet our data protection standards for personal information and are compliant with data privacy laws such as the GDPR. Please refer requests for due diligence assistance to Compliance.

3.3.7 Data transfers

As mentioned above, personal information cannot be transferred outside of Europe (which includes access from non-European countries), unless the transfer is:

- To a country approved by the European Commission as having adequate data protection laws to protect the personal information (there are only a handful of these);
- To an organisation located in the US that is Privacy Shield certified (a European Commission approved scheme for transfers of personal information to certified organisations in the USA); or
- To an organisation that has entered into a data transfer agreement with us (based on European Commission approved standard contracts);
- To an organisation that has its "binding corporate rules" approved by the European data protection regulators.

Some countries outside Europe have similar laws and requirements for data transfers out of the country. If you are aware of any (planned) personal information transfers without appropriate transfer mechanisms (such as those described above in the case of transfers from Europe), please contact privacy@woodplc.com.

3.3.8 Data protection by design and Data Protection Impact Assessments

- We must build data protection compliance into our processes and systems from

the ground up. To do this, it is important that all employees have a good understanding of the data protection obligations (as set out in this Policy). It is also necessary to ensure that the concept of data protection by design, minimising the personal information collected by any new systems Wood introduces, is consider from the outset and during the life cycle of the product.

- We also have in place a standard template for carrying out data protection impact assessments. A data protection impact assessment (DPIA) involves documenting how we can comply with data protection laws and mitigate potential risks to privacy of individuals. For higher risk (more intrusive) uses of personal information, a data protection impact assessment may be mandatory (i.e. data protection law requires us to document this).
- Wood has developed a checklist for departments to use to determine whether or not they need to conduct a data protection impact assessment. In some cases it may not be mandatory to carry out a data protection impact assessment, however, you should consider carrying one out for any new use of personal information (including where collecting new types of data or putting existing data to new uses) as this will help us comply not only with data protection by design principles but also data protection law.
- If you have questions about the process or scope, or if you believe there is a system that a DPIA should be undertaken, please contact your local data protection ambassador.

3.4 Data Protection Complaints

- For requests from individuals to exercise their data subject rights, please see the Data Subject Rights Handling Policy.
- For complaints from individuals about our processing of their personal information, please refer the complaint as soon as possible to your local data protection officer or data protection ambassador. Where appropriate complaints will be escalated to Wood's global Data Protection Officer.

4 Definitions

The following terms are used within this document.

Term	Definition
Personal Information	(also often referred to as "personal data") any information about an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number, location date, online identifiers or to one or more factors specific to that person's physical, physiological, genetic, mental, economic, cultural or social identity. Examples of data that may permit this kind of identification in the employment context include but are not limited to: identification data (such as name, address, date and place of birth, photograph); contact details (such as telephone number, email, address); national

Term	Definition
	identifiers (such as ID numbers, tax IDs/social security numbers, driver's licence number, passport number); education and training (educational history, professional qualification and experience, professional organisations, publications); and professional status (such as title, position, location). Examples of data that may permit this kind of identification in a client or candidate context includes name and contact details on our CRM databases, email addresses, IP address, newsletter subscriptions and marketing preferences.
Processing, Process, Processed	any operation or set of operations performed upon Personal Information, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, transfer, remote access or otherwise making available, alignment or combination, blocking, erasure or deletion. Essentially the term "process" covers anything you can do with personal information.
Sensitive Data	a subset of personal information that contains information relating to a person's race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (for identifying a person), health data and data about sex life or sexual orientation.
Criminal Records Data	information relating to criminal convictions and offences or related security measures.

5 References

Document title	Document no.
Wood Code of Conduct	
Data Subject Rights Handling Policy	
Information Security Policy	GIT-PLD-100002

6 Revision History

Rev no.	Rev date	Summary of changes
R1	31-Jul-2018	Issued for Comment
0	01-Aug-2018	Issued for Use, replaces IGS-PRO-100007 and IGS-GDS-100001

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