



APPLICANT DATA PROTECTION NOTICE

Introduction

Oceaneering provides this Applicant Data Protection Notice to explain our practices regarding the collection, use, and other processing of certain individually identifiable information about job applicants or other potential employees ("Personal Data"), in connection with recruiting and hiring activities.

1. What Personal Data do we collect?

Oceaneering collects and uses, and otherwise processes the following categories of Personal Data in consideration of your potential employment at Oceaneering:

- A. **Contact information**, such as personal and business address, and personal and business phone/fax numbers and email addresses;
- B. **Personal identification information**, such as name, date of birth, nationality, gender, and country of birth; and
- C. **Employment qualifications information**, such as certificates and degrees obtained, languages spoken and skills, software experience, professional memberships, summaries of strengths and technical areas of expertise, pre-Oceaneering work history information (previous employers and positions held, dates, locations, supervisors, responsibilities, salary), resume and cover letter information, references and information obtained from them, and related background check (to the extent permitted, and in accordance with applicable law).

Personal Data will be collected either directly from you, or from authorized third parties (e.g., people you have named as your references, previous employers, schools, public authorities, or public resources), subject to the requirements of applicable law.

The provision of Personal Data as described in this Applicant Data Protection Notice is partly a statutory requirement, partly a contractual requirement under the terms of our recruiting website, and partly a requirement to carry out the recruitment and hiring process with you. In general, you are required to provide the Personal Data, except in limited instances when we indicate that certain information is voluntary. Not providing your Personal Data may prevent Oceaneering from carrying out recruiting and hiring activities that impact your potential employment with us.

2. For what purposes and on what bases do we use and process Personal Data?

Oceaneering will process Personal Data for the following purposes:

PROCESSING PURPOSES	PERSONAL DATA CATEGORIES*		
	A	B	C
Recruiting and hiring activities , including administering your recruitment, making a hiring decision (including assessing qualification and tracking candidates during the application process, and carrying out interviews), and completing the hiring process in case you should be offered and accept a position with Oceaneering (including activities related to on-boarding and the new hire process).	•	•	•
Complying with applicable laws and employment-related requirements along with the administration of those requirements, such as employment and immigration laws.	•	•	•

*Data categories are listed in the previous section and correspond to the letters in each column; "What Personal Data do We collect?"



Oceaneering relies on the following legal grounds for the collection, use, and other processing of Personal Data:

PERSONAL DATA
<ul style="list-style-type: none">• Taking steps at your request (i.e., administering your application, prior to entering into a potential employment contract with you);• Performance of the contract with you for the usage of our recruiting website;• Compliance with legal obligations, in particular in the area of labor and employment law, social security and social protection law, data protection law, tax law, and corporate compliance law;• Consent, as permitted by applicable law;• Protection of the vital interests of you as a job applicant or of another individual; and• Legitimate interest of Oceaneering or other third parties (e.g., existing or potential suppliers, customers, governmental bodies, or courts) where the legitimate interest could be in particular internal information sharing, and customer relationship management activities, or potential merger and acquisition activities.

3. Under what conditions is Personal Data transferred to other recipients?

Oceaneering may transfer your Personal Data as necessary, to third parties for the processing purposes described above as follows:

- **Oceaneering Companies Group:** We share your Personal Data amongst the Oceaneering group of companies, and in particular, Oceaneering International, Inc. in the United States (collectively, the "**Oceaneering Companies Group**"), as necessary for the processing purposes, and in particular to conduct recruiting and hiring activities, and respond to and comply with requests and legal demands;
- **Acquiring or acquired entities:** If the Oceaneering business for which you submitted your Personal Data, in relation to your interest for an employment position, is sold or transferred in whole or in part or if Oceaneering is acquiring and integrating another entity into the Oceaneering entity or business for which you applied for an employment position, your Personal Data may be transferred to the other entity prior to the transaction (e.g., during the diligence phase) or after the transaction, subject to any rights provided by applicable law, including the laws of the jurisdictions where the other entity is located; and
- **Data processors:** Certain third party service providers such as IT support or HR support providers, whether affiliated or unaffiliated, will receive your Personal Data to process such data under appropriate instructions ("**Data Processors**") as necessary for the processing purposes, in particular to conduct recruiting and hiring activities, comply with applicable laws and employment-related requirements, and other activities. These Data Processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the Personal Data, and to process the Personal Data only as instructed.

The recipients identified above may be located inside or outside the European Economic Area ("EEA"). Recipients outside the EEA might be located in countries that do not offer an adequate level of protection from an EEA data protection law perspective. Oceaneering will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. With respect to transfers to countries not providing an adequate level of data protection, Oceaneering will base the transfer on appropriate safeguards, such as the EU standard contractual clauses, approved codes of conduct together with binding and enforceable commitments of the recipient, or approved certification mechanisms together with binding and enforceable commitments of the recipient.



Any access to your Personal Data is restricted to those individuals who have a need to receive or access Personal Data in order to fulfill their job responsibilities. Oceaneering may also disclose your Personal Data as required or permitted by applicable law to professional advisors, governmental authorities and courts, external advisors, and similar third parties.

4. *For how long does Oceaneering retain my Personal Data?*

Your Personal Data is stored by the Oceaneering Companies Group, and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the Personal Data is collected, in accordance with applicable data protection laws. When the Oceaneering Companies Group no longer needs to use your Personal Data, we will remove it from our systems and records and/or take steps to properly render it unintelligible so that you can no longer be identified from it (unless we need to keep your Personal Data to comply with legal or regulatory obligations to which the Oceaneering Companies Group is subject). Oceaneering will generally retain your Personal Data in accordance with the Record Retention Policy & Schedule, unless retention for a longer period is warranted due to a legal requirement, including the need to support or defend a legal claim that is not yet barred by the applicable statute of limitations.

If you accept an offer from Oceaneering, your Personal Data will be retained for the duration of your employment with Oceaneering and as necessary in accordance with applicable law and the Record Retention Policy & Schedule.

5. *Automated Decision-Making*

Oceaneering engages in certain limited automated decision-making, including profiling, for recruiting purposes, in order to efficiently narrow potential candidates to those who can legally be employed in the country in which the position is offered (e.g., work permit, permanent residency, or citizenship) and to those with the industry standard minimum qualifications for the respective position (e.g., professional licensure). If you are applying for a position in a country in which you are not eligible for employment, or for a position requiring an industry standard minimum qualification, for which you do not have, your application may be automatically denied. Additional information in this regard is set out below in Section 6(vii).

6. *What are my rights?*

If you have declared your consent regarding certain types of processing activities (for example, via a separate specific consent form), you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Pursuant to applicable data protection law, you also have the right to: (1) request access to your Personal Data; (2) request rectification of your Personal Data; (3) request erasure of your Personal Data; (4) request restriction of processing of your Personal Data; (5) request data portability of your Personal Data; and/or (6) object to the processing of your Personal Data. Please note that these aforementioned rights might be limited under the applicable national data protection law.

- (i) **Right of access:** Under certain circumstances, you have the right to obtain from us confirmation as to whether or not Personal Data about you is processed, and, where that is the case, to request access to such Personal Data. The access information includes, inter alia, the purposes of the processing, the categories of Personal Data, the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, the sources of the Personal Data, the duration of retention of the Personal Data, and the technical security measures put in place to safeguard the Personal Data in case of transfer outside the EEA. However, this is not an absolute right and the interests of other individuals may restrict your right of access. Most information is set out in this Applicant Data Protection Notice, but supplementary information will be provided where necessary. In addition to access, you have the right to obtain a copy of the Personal Data. Note that, for additional copies requested by you, we may charge a reasonable fee based on administrative costs.



- (ii) **Right to rectification:** Under certain circumstances, you have the right to obtain from us the rectification (i.e., correction) of inaccurate Personal Data about you. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.
- (iii) **Right to erasure (right to be forgotten):** Under certain circumstances, you have the right to obtain from us the erasure of Personal Data about you. In such cases, we will erase, or render permanently unintelligible, such Personal Data.
- (iv) **Right to restriction of processing:** Under certain circumstances, you have the right to obtain from us the restriction of processing of your Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes. However, as Oceaneering processes and uses your Personal Data primarily for purposes of carrying out a contractual employment relationship with you, Oceaneering will in principle have a legitimate interest for the processing which will override your restriction request, unless the restriction request relates to marketing activities (which generally do not apply in the employment context).
- (v) **Right to data portability:** Under certain circumstances, you have the right to receive the Personal Data about you that you have provided to us, in a structured, commonly used and machine-readable format so you can transmit this Personal Data to another entity.
- (vi) **Right to objection:** Under certain circumstances, you have the right to object, on grounds relating to your particular situation, to the processing of your Personal Data by us. Where such right applies, we will no longer process the relevant Personal Data. This is not an absolute right and does not apply in certain situations, such as when processing is necessary to perform the employment contract, to comply with applicable EU or member state law, or to defend legal claims.
- (vii) **Right to not be subject to a decision based solely on automated processing:** Under certain circumstances, you have the right to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Where such right applies, we will allow you to request human intervention, express your point of view, and/or contest the decision.

You also have the right to lodge a complaint with the competent data protection supervisory authority.

7. *How do I reach the contact person for questions?*

If you have any questions about this Applicant Data Protection Notice, or if you would like to request rights or a copy of the appropriate safeguards concerning your Personal Data, you should contact the HR department with whom you have been working. You may also contact Oceaneering International, Inc. in the United States at compliance@oceaneering.com.