

INTER TERMINALS AMSTERDAM B.V.
PRIVACY NOTICE FOR CCTV RECORDING

Inter Terminals is committed to protecting and respecting your privacy and complying with data protection legislation. This privacy notice explains how Inter Terminals uses any personal data which we collect about you from our use of CCTV. This notice shall apply to employees and all other persons that are present at or who are in the vicinity of our Amsterdam site.

Within this privacy notice 'Inter Terminals' shall refer to Inter Terminals Amsterdam B.V. and 'we' 'us' and 'our' shall be interpreted accordingly. Inter Terminals shall be the data 'controller'. If you have any queries about this privacy notice you should contact us by email at dataprotection@interterminals.com.

What personal data do we collect about you?

Where CCTV is in operation at the Amsterdam site, images of you may be processed. Signage at the site indicates that CCTV is in operation.

What will your personal data be used for and why?

CCTV is used to help us ensure safety and security at our site and also in relation to compliance with our legal obligations.

- **Safety** – CCTV images will be used to help maintain safety at our site. CCTV may be live monitored to assist in the prevention of safety related incidents and recordings may be used in the investigation of safety related incidents (including any near miss) in order to understand the cause of such incident and to put corrective action in place, or for audit purposes to ensure safety critical tasks are routinely completed.
- **Security** - CCTV images will be used to help maintain the security of our site. CCTV may be live monitored to assist in the prevention of security related incidents and recordings may be used in the investigation of security related incidents. Maintaining security is critical to ensure: safety at our site; protection of our property and that of any third party at or located in the vicinity of our site; the protection of duty suspended product where authorised by Dutch Customs Authority to operate as [customs and] tax warehouses.
- **Compliance with legal obligations** – CCTV recording helps us to comply with our legal obligations. Our terminal is an 'upper tier' site for the purposes of the Besluit Risico Zware Ongevallen (BRZO) regulations. These regulations require us to demonstrate that we take all measures necessary to prevent major accidents at our site and limit their consequences to persons and the environment. We consider the use of CCTV to be a critical measure in minimising safety and security risks which consequently minimizes the risks to the environment and local populations.

For the avoidance of doubt, we may review and use CCTV images when investigating safety and security related incidents under our Reglement Sanctiebeleid for employees.

We consider there to be two potential legal bases for processing your personal data: first because the processing is necessary for the purposes of our legitimate interests, being the safety and security of our site and property and people located on the site; and secondly because the processing is necessary for compliance with legal obligations to which we are subject.

Whilst we do not expect to routinely process any special categories of personal data as a result of CCTV recording, it is possible that special categories of personal data may be processed. Where this is the case, the legal basis for processing is likely to be: because it is necessary for the purposes of carrying out our

obligations and in exercising our rights in the field of employment law; because the individual has made the special categories of personal data manifestly public; or in order to establish, exercise or defend legal claims.

Who else might have access to or receive your personal data?

We may share your personal data with certain employees, workers, agency workers, agents and or professional Advisors and those of and our wider group of companies, which at the date of this notice comprises Inter Pipeline Ltd. and its subsidiaries, where considered appropriate for the purposes for which the data is being processed.

We may also share your personal data with other third party companies who provide services to us (for example CCTV and information technology service providers). Where there is a need in relation to safety or security at our site, we may also share your personal data with any other relevant third party in connection with your presence at (or in the vicinity of) our site, such as our customers (and their agents and contractors), our contractors and your employer. We may also share your personal data where we are under a legal obligation to do so.

How long will your personal data be stored for?

CCTV recordings will normally only be retained for such period of time as to allow an incident to come to light and for an investigation into any incident to be concluded. Where no incident has come to light, our normal practice is not to keep CCTV footage for longer than 35 days after it was recorded.

Notwithstanding the foregoing, all emails sent to and from any Inter Terminals' email addresses may be kept for long periods of time in accordance with archiving protocols adopted by Inter Terminals from time to time. If CCTV images have been sent by email then these will be retained in accordance with such archiving protocols.

What rights do you have in respect of your personal data?

Under the data protection legislation you have various rights in relation to your personal data. These include the right to: request from us access to your personal data; request from us the rectification or erasure of your personal data; request from us the restriction of processing or to object to the processing of your personal data; data portability.

You also have the right to lodge a complaint to the Dutch Data Protection Authority if you believe that we have not complied with the requirements of the data protection legislation with regard to your personal data. You can also submit an enquiry or complaint directly to us by emailing dataprotection@interterminals.com.

Will your personal data be transferred outside the European Economic Area ("EEA") to a 'third country'?

It is possible that your personal data will be transferred outside the EEA to a third country (for example, to Inter Pipeline Ltd. in Canada). If your personal data is transferred outside of the EEA then such transfer will be made in compliance with the conditions of transfer set out in data protection legislation.