

# **Schlumberger**

## **Employee Personal Information Notice**

### **1. Introduction**

Schlumberger Limited and its affiliated entities (together “Schlumberger”) value the trust of their employees and are committed to protecting the personal information of employees. Schlumberger operates in many different countries. Some of these countries have laws related to the collection, use, transfer and disclosure of the personal information of individuals, including our employees. We take these obligations very seriously, and we are committed to protecting the privacy of our current and former employees. The purpose of this Employee Personal Information Notice (the “Notice”) is to give you information about what personal information we collect, use, transfer and disclose, and why.

### **2. What Information About You We Collect, Use, Transfer and Disclose, and Why**

During your employment with a Schlumberger company (the “Company”), the Company collects information about you and your working relationship with the Company, or your spouse, domestic/civil partner or dependents (“Dependents”). We refer to such information as “Personal Information”. For more specific information regarding what Personal Information about you the Company collects, uses, transfers and discloses, and the purposes for which it is collected, used, transferred and disclosed, please see the end of this Notice. Local employee handbooks, office manuals and notices provided in your local office may provide additional details or information.

We collect and process information about you for a variety of reasons. For more detail regarding the reasons and purposes for which we process Personal Information please see the end of this Notice. Where none of these reasons apply, your decision to provide Personal Information to the Company is voluntary. If we collect or process Personal Information based on your consent, you may withdraw your consent at any time.

We receive Personal Information from you as well as from other sources as detailed at the end of this Notice.

### **3. Transfer and Joint Use of Personal Information**

Due to the global nature of Schlumberger operations, the Company discloses Personal Information to personnel and departments throughout Schlumberger to fulfill the purposes described at the end of this Notice. This may include transferring Personal Information to other countries. For example, if you are located in the European Economic Area (comprised of the EU Member States, Iceland, Liechtenstein, and Norway, together “EEA”), we transfer your Personal

Information to countries located outside of the EEA. For more information on transfer, please see the end of this Notice.

Access to Personal Information within Schlumberger will be limited to those who have a need to know the information for the purposes described at the end of this Notice, and will include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit.

All personnel within Schlumberger will generally have access to your business contact information such as name, position, telephone number, postal address and email address.

From time to time, Schlumberger will need to make Personal Information available to other unaffiliated third parties. Please see the end of this Notice for a list of the categories of unaffiliated third parties. Some of the unaffiliated third parties will be located outside of your home jurisdiction, including in the United States or any other country in which we or they have operations.

#### **4. Security**

The Company will take appropriate measures to protect Personal Information that are consistent with applicable privacy and data security laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Information.

#### **5. Data Integrity and Retention**

The Company will take reasonable steps to ensure that the Personal Information processed is reliable for its intended use, and is accurate and complete for carrying out the purposes described in this Notice. The Company will retain Personal Information for the period necessary to fulfill the purposes outlined in this Notice unless a longer retention period is required or permitted by law. For information on the criteria used please see the end of this Notice.

#### **6. Access and Correction Requests, Questions and Complaints**

For current employees, please contact AskHR (include "Data Privacy" in the subject line: [askhr@slb.com](mailto:askhr@slb.com) for current employees and <https://myaskhr.slb.com/external/portal.pl> for former employees) if you have any questions or concerns about how the Company processes Personal Information; if you would like to request to access, correct, suppress or delete Personal Information about you or request that we cease using it as permitted by applicable law; or if you would like to request a copy or portability of your Personal Information. We will respond to your request consistent with applicable law. Please note, however, that certain Personal Information may be exempt from requests pursuant to applicable data protection laws or other laws and regulations.

## **7. Employee's Obligations**

Please keep Personal Information up to date and inform us of any significant changes to Personal Information. You agree to inform your Dependents whose Personal Information you provide to the Company about the content of this Notice, and ensure you have the right to provide that information to the Company. You further agree to follow applicable law and both the Company's and Schlumberger's policies, standards and procedures that are brought to your attention when handling any Personal Information to which you have access during your relationship with the Company. In particular, you will not access or use any Personal Information for any purpose other than in connection with and to the extent necessary for your work with the Company. You understand that these obligations continue to exist after termination of your relationship with the Company.

## **8. Data Privacy & Protection Contact Information and Complaints**

If you have any questions about Data Privacy & Protection, please refer to <https://slb001.sharepoint.com/sites/HubPages/Pages/ContentPages/6db2a855-d0c6-4589-9503-d734d306359f.aspx> for the relevant contact information (if you are a former employee please use [myaskhr@slb.com](mailto:myaskhr@slb.com)). You may also contact the data privacy and protection person responsible for your country or region - also included on this contact information link, if applicable.

You also may lodge a complaint with a Data Protection Authority for your country or region or in the place of the alleged misconduct: [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)].

## Types of Personal Information We Collect, Use, Transfer and Disclose:

- **Personal Details:** Name, employee identification number, work and home contact details (email, phone numbers, physical address) language(s) spoken, gender, date of birth, national identification number, social security number, driver's license number, car license plate number, marital/civil partnership status, domestic partners, dependents, disability status, emergency contact information and photograph.
- **Documentation Required under Immigration Laws:** Citizenship, passport data, details of residency or work permit.
- **Compensation and Payroll:** Base salary, bonus, benefits, compensation type, salary step within assigned grade, details on stock options, stock grants and other awards, currency, pay frequency, effective date of current compensation, salary reviews, banking details, working time records (including vacation and other absence records, leave status, hours worked and department standard hours), pay data and termination date.
- **Position:** Description of current position, job title, corporate status, management category, job code, salary plan, pay grade or level, job function(s) and subfunction(s), company name and code (legal employer entity), branch/unit/department, location, employment status and type, full-time/part-time, terms of employment, employment contract, work history, hire/re-hire and termination date(s) and reason, length of service, retirement eligibility, promotions and disciplinary records, date of transfers, and reporting manager(s) information.
- **Talent Management Information:** Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications, language and other relevant skills, certification, certification expiration dates), information necessary to complete a background check, details on performance management ratings, development programs planned and attended, e-learning programs, performance and development reviews, willingness to relocate, driver's license information, and information used to populate employee biographies.
- **Management Records:** Details of any shares of common stock or directorships.
- **System and Application Access Data:** Information required to access company systems and applications such as System ID, LAN ID, email account, instant messaging account, mainframe ID, previous employee ID, previous manager employee ID, system passwords, employee status reason, branch state, country code, previous company details, previous branch details, and previous department details, and electronic content produced using Company systems.
- **Sensitive Information:** We may also collect certain types of sensitive information, where permitted by applicable law, such as health/medical information, place of birth, trade union membership information, religion, and race or ethnicity, or biometric information (such as fingerprints). We collect this information for specific purposes, such as health/medical information to accommodate a disability or illness and to provide benefits; religion or church affiliation in countries such as Germany where required for statutory tax deductions; and diversity-related Personal Information (such as race or ethnicity) in order to comply with legal

obligations and internal policies relating to diversity and anti-discrimination. As explained in the following section, we will only use such sensitive information for the following purposes and as permitted by law.

## **The Purposes for Which We Collect, Use, Transfer and Disclose Personal Information**

We collect, use, transfer and disclose Personal Information for the purposes listed below based on one or more of the following reasons: (i) because we are required to do so by local applicable law; (ii) because such information is necessary to fulfill the employment contract; (iii) because such information is of particular importance to us and we have a specific legitimate interest under law to process it; or (iv) where necessary to protect the vital interests of any person. Regarding (iii) above, we have a legitimate interest in collecting and processing Personal Information, for example: (1) to ensure that our networks and information are secure; (2) to administer and generally conduct business within Company and across the organization; and (3) to prevent fraud.

- **Managing Workforce:** Managing work activities and personnel generally, including recruitment, appraisals, performance management, promotions and succession planning, rehiring, administering salary, and payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare, pensions and savings plans, training, leave, managing sickness leave, promotions, transfers, secondments, honoring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing employee surveys, performing background checks, managing disciplinary matters, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills, workforce reporting and data analytics/ trend analysis, and creating and maintaining one or more internal employee directories. We will engage in these activities to manage our contractual relationship with you, based on our legitimate interests and/or to comply with a legal obligation.
- **Workforce Analytics:** We use workforce analytics for succession planning, workforce management, data security. For instance, we use workforce analytics to assist in planning succession and to ensure business continuity, to design employee retention programs and diversity initiatives, to offer training opportunities and to identify patterns in the use of technology systems to information entrusted to us as well as to protect Schlumberger's people and property. We will engage in these activities based on our legitimate interests.
- **Communications, Facilities and Emergencies:** Facilitating communication with you, ensuring business continuity and crisis management, providing references, protecting the health and safety of employees and others, safeguarding and maintaining IT infrastructure, office equipment, facilities and other property, facilitating communication with you and your nominated contacts in an emergency. We will engage in these activities to manage our contractual relationship with you, based on our legitimate interests and/or to comply with a legal obligation.

- **Business Operations:** Operating and managing the IT, communications systems and facilities, managing product and service development, improving products and services, managing company assets, allocating company assets and human resources, strategic planning, project management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integration with purchaser. We will engage in these activities based on our legitimate interests and/or to comply with a legal obligation.
- **Monitoring:** Monitoring compliance with the Schlumberger Code of Conduct and internal policies, including pursuant to the Company's policies and procedures about monitoring of telephone, email, Internet and other company resources, and other monitoring activities as permitted by local law. We will engage in these activities based on our legitimate interests and/or to comply with a legal obligation.
- **Compliance:** Complying with legal and other requirements applicable to our businesses in all countries in which we operate, such as income tax and national insurance deductions, record-keeping and reporting obligations, conducting audits, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims (including those received through the hotline), conducting investigations including employee reporting of allegations of wrongdoing, policy violations, fraud, or financial reporting concerns, and complying with internal policies and procedures. We will engage in these activities to manage our contractual relationship with you, based on our legitimate interests and/or to comply with a legal obligation.

### **The Categories of Unaffiliated Third Parties with Whom Schlumberger Shares Personal Information**

- **Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries in which Schlumberger operates.
- **Service Providers:** Companies that provide products and services to Schlumberger such as payroll, pension scheme, benefits providers; human resources services, performance management, training, expense management, IT systems suppliers and support; third parties assisting with equity compensation programs, credit card companies, medical or health practitioners, trade bodies and associations, and other service providers.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over Schlumberger such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- **Corporate Transaction:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Schlumberger business, assets or stock (including in connection with any bankruptcy or similar proceedings).

## Other Sources from Whom We Receive Personal Information

- Colleagues
- Managers
- References you provide
- Prior employers or schools
- Clients
- Background check providers

## Transfers of Personal Information

- For a list of the Schlumberger affiliates that may be involved in joint processing and use of Personal Information (and their locations), see <http://mdm.slb.com/LE/Pages/LegalEntity.aspx>. The Company and Schlumberger will remain jointly responsible for Personal Information about you that is transferred and jointly used.
- Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)). Regarding transfers from the EEA to other countries, we have put in place adequate measures, such as the Schlumberger Binding Corporate Rules for Employee Data, as well as standard contractual clauses adopted by the European Commission. Employees in the EEA may obtain a copy of these measures at this link: <https://slb001.sharepoint.com/sites/HubPages/Pages/ContentPages/2402b2f4-2f14-4d01-a8be-2f9b60585d7f.aspx>.

## Criteria Used to Determine Our Retention Periods

- The duration of your employment;
- As long as we have an ongoing relationship with you or your Dependents (e.g. deferred benefits, pension, etc.);
- As required by a legal obligation to which we are subject;
- As advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations); and
- Other reasons listed in the Binding Corporate Rules.