

## **ARAMCO EUROPE PRIVACY NOTICE FOR SUPPLIERS**

Aramco Europe B.V. ("Aramco Europe"), an indirectly wholly owned subsidiary of The Saudi Arabian Oil Company ("Saudi Aramco" – located in Saudi Arabia), follows strict corporate guidelines to protect the Personal Data relating to (potential) suppliers or (potential) business partners of Aramco Europe or of Aramco Europe's managed subsidiaries, including Aramco Overseas Malaysia SDN. BHD. ("AOM"), and, other group affiliates, including Aramco Overseas Company UK Ltd. ("AOC UK"), and to ensure compliance with local data protection regulations.

### **Introduction**

This Aramco Europe Privacy Notice for Suppliers ("Notice") covers Aramco Europe's Processing of Personal Data relating to:

- Aramco Europe B.V.'s own (potential) suppliers and (potential) business partners (including their employees and representatives); and
- (potential) suppliers and (potential) business partners (including their employees and representatives) who Aramco Europe B.V. registers, onboards and procures for its managed subsidiaries and other group affiliates that themselves enter into agreements with such suppliers or business partners;

All these (potential) suppliers and (potential) business partners are hereafter referred to as "Business Partners" or "you".

In this Notice, Aramco Europe, as the Controller in respect of the Processing of your Personal Data, informs you (among other things) of the nature of the Personal Data collected and held in its files and the purposes of the Processing. For the relevant Processing operations, this Notice has precedence over other Aramco Europe notices that may be publicly available.

As well as this Notice, bespoke privacy notices and supplementary privacy statements may contain further information about how we Process Business Partners' Personal Data. In those instances, such privacy notices will be communicated separately. These privacy notices may vary among the countries in which we operate to reflect local practices and applicable law requirements.

Defined terms used in this Notice are explained in the section below.

### **Definitions**

"Controller" means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

"Personal Data" means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

"Process", "Processing" or "Processed" means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Sensitive Personal Data” means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, biometric data, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law.

### **Personal Data Collected and Stored by Aramco Europe**

Where relevant for the type of engagement or the context of the interaction with the Business Partner, Aramco Europe collects or obtains (and keeps in its electronic system and physical files) the following categories of Personal Data, relating to Business Partner’s employees and representatives:

- Contact names;
- Business addresses;
- Business contact telephone numbers;
- Business Email addresses;
- Job titles;
- Signatures;
- Curriculum vitae or similar experience/qualification information (diplomas, certificates, licenses etc.);
- Letters of recommendation and references relating to past job performance;
- Information for trade compliance screening or compliance with trade control rules and national laws, or when relevant for specific functions;
- Invoice or contract-related information;
- Relationship data in the ordinary course of our relationship with you (e.g., you provide a service to us);
- Registration and attendance records;
- Visitor-registration data and badge or access metadata;
- Photography, filming, audio-recording, meeting-recording or CCTV data;
- Information obtained or created during meetings, during visits from sales or marketing representatives, or at events we attend/host;
- Itinerary data where travel or visa support is provided; and
- Those data that are provided to us (e.g., where you contact us via email, or when you provide us with a business card).

Some of the collected data may include Sensitive Personal Data, such as:

- Passport data, including data pertaining to passport restrictions, to be collected solely for assisting Business Partners to go through any required visa process. Such data will not be used for any other reasons;
- Background screening data (including criminal/civil background) again for assisting Business Partners to go through any required visa process or as part of a background check.

Personal data may be provided to us directly by the Business Partner (including by its employees or representatives) or indirectly from other sources, such as group affiliates and other Business Partners or from publicly available or government issued sanctions lists and media sources.

We also create Personal Data about you in certain circumstances, such as records of your interactions with us.

## **The Purposes of, and Legal Bases for, Processing Your Data**

Aramco Europe Processes your Personal Data as follows:

- (1) For the purpose of pre-qualifying and registering for as well as entering into a contract with the Business Partners:
  - (a) identifying, screening, assessing, and selecting Business Partners to be considered for potential business contracts by Aramco Europe for the benefit of Saudi Aramco and Aramco Europe;
  - (b) verifying the truthfulness of Business Partner information through submitted and publicly available information about the Business Partner;

In connection with the contractual pre-qualification and registration process to become a Business Partner for Aramco Europe, Aramco Europe carries out governance, risk and compliance screening of Business Partners. This includes customs and global trade compliance and sanctioned party list screening. Aramco Europe implements these screening activities in order to comply with applicable laws (*e.g.*, on trade compliance and anti-money laundering) or on the basis of Aramco Europe or Saudi Aramco's legitimate interests to prevent and detect fraud and crime.

- (2) As necessary to perform a contract with the Business Partner, including to handle a request for information, a request for quotation, and a procurement agreement or contract and for the following purposes:
  - (a) contract management;
  - (b) assessment of the Business Partner's performance;
  - (c) processing invoices;
  - (d) claims support;
  - (e) assisting Business Partners with possible required travel, such as to the Kingdom of Saudi Arabia, including assistance with visas required for such travel;
  - (f) communicating with you in connection with the contract.
- (3) For the following purposes, based on Aramco Europe or Saudi Aramco's legitimate interest(s):
  - (a) Security management and other visitor and facility access, including registration of and managing access and issuing access badges to Business Partner visitors;
  - (b) event management, such as online and in-person Business Partner events organized by Aramco Europe;
  - (c) exercising rights and obligations, including the establishment, exercise or defense of legal claims;

- (d) to carry out internal auditing, ensuring compliance with internal policies and administrative procedures;
  - (e) conclude corporate transactions (*e.g.*, corporate restructuring, sale or assignment of assets, merger);
  - (f) photography, filming, audio recording, meeting recording and related event or meeting administration where applicable;
  - (g) travel, payment, reimbursement, invoicing and cost-allocation support;
  - (h) detecting, investigating and preventing breaches of policy, fraud and criminal offences, in accordance with applicable law.
- (4) To comply with legal obligations under applicable laws, such as in the areas of corporate law, tax law and trade compliance, and for legal requests or administrative or judicial process;
- (5) For any other purpose to which the Business Partner has provided their consent.

### **Sharing Your Personal Data**

Aramco Europe may share your Personal Data with Saudi Aramco or other group affiliates, as well as with third parties (in particular, service providers – *e.g.*, IT service providers, external consultants, etc.) as needed for the purposes mentioned in this Notice. Aramco Europe will only share your Personal Data with those recipients on a strict need-to-know basis, meaning that only recipients who need to have access to your Personal Data to carry out their own function will receive your Personal Data. In order to safeguard your Personal Data, Aramco Europe has agreements in place with the aforementioned third parties that have access to the data. All Saudi Aramco and group affiliate personnel who have access to your Personal Data operate under strict corporate guidelines to ensure the protection of the data and compliance with local data security regulations.

Aramco Europe may be required to share your Personal Data with public and governmental authorities, law enforcement or courts, for instance to comply with a legal obligation to disclose such information to the relevant authority or court or to allow Aramco Europe, Saudi Aramco or its affiliates to defend themselves in litigation and other disputes.

Aramco Europe may also share your Personal Data to a third party as needed in the context of any proposed or actual investment or financing transaction, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of its business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Aramco Europe may share your Personal Data with your appointed representatives, or any other third party provided you have consented in writing to such disclosure.

Aramco Europe may also share your Personal Data with any relevant third party acquirer(s) or successor(s) in title, in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Finally, Aramco Europe may share your Personal Data with accountants, auditors, consultants, lawyers and other outside professional advisors to Aramco Europe, subject to binding contractual obligations of confidentiality.

## International Transfers

Some of the recipients mentioned in the previous section may not be located in your jurisdiction and, as a result, your data may be made available in Saudi Arabia and other jurisdictions (including outside the European Union) where data protection laws may not be as protective. In order to transfer the Personal Data in compliance with applicable data protection laws, Aramco Europe has entered into data transfer agreements (e.g., the EU Standard Contractual Clauses) or similar safeguards with its group affiliates and with Saudi Aramco and with third parties that may receive your Personal Data. If you would like to receive more information or a copy of these agreements, please contact us at the contact details mentioned below (see section “Your Rights”).

Alternatively, if an exemption or derogation applies (e.g., where a transfer is necessary to establish, exercise or defend a legal claim) we may rely on that exemption or derogation, as appropriate.

## Retention

Information of Business Partners will be kept on file as long as Aramco Europe has a relationship with a Business Partner or to be registered with Aramco Europe as a potential Business Partner. After the relationship has ended Aramco Europe will retain the information for a period of time as may be required by law and/or to protect Aramco Europe’s legal interests.

Aramco Europe will not keep any information for longer than is necessary and when Aramco Europe no longer needs the information, Aramco Europe will securely destroy it in accordance with Aramco Europe’s internal policies or anonymize it. The criteria for determining the duration for which we will retain your Personal Data are as follows:

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(1) we will retain Personal Data in a form that permits identification only for as long as:

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- (a) we maintain an ongoing relationship with you (e.g., where you are a user of our services); or
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- (b) your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g., where your Personal Data are included in a contract between us and your employer, and we have a legitimate interest in Processing those Personal Data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

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**plus:**

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(2) the duration of:

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- (a) any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data are relevant); and
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- (b) an additional two (2) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

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**and:**

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- (3) in addition, if any relevant legal claims are brought, we continue to Process Personal Data for such additional periods as are necessary in connection with that claim.
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During the periods noted in paragraphs (2)(a) and (2)(b) above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

Where provided by applicable law, Business Partners may request earlier deletion by contacting Aramco Europe in writing (including by email) at the address below:

Aramco Europe B.V.  
Attn: Relevant business partner or Sourcing & Supplier Relationship Management Unit  
Prinses Beatrixlaan 35  
2595 AK The Hague  
The Netherlands

Email: Relevant business partner or [SRM@aramcoeurope.com](mailto:SRM@aramcoeurope.com)

### **How we protect and handle your Personal Data**

We use robust technical and organizational measures to protect Personal Data we Process about you. All personnel who have access to your Personal Data operate under strict corporate guidelines to ensure the protection of the data and compliance with applicable local data protection laws and regulations.

### **Your Rights**

Under applicable data protection law, you may have certain rights regarding your Personal Data. In particular, you may have the right to:

- Access, or receive copies of, your Personal Data, together with information regarding the nature, Processing and disclosure of those Personal Data;
- Rectify any inaccuracies in your Personal Data (add to or update/correct some of your Personal Data);
- Request the erasure of your Personal Data;
- Restrict the Processing of your Personal Data;
- Object to the processing of your Personal Data;
- The right to withdraw your consent to the Processing of your Personal Data;
- Not to provide your Personal Data to us (however, please note that we will be unable to provide you with the full benefit of our services);
- Portability of your Personal Data, in a structured, commonly used and machine-readable format, to the extent applicable.

You may be able to access at least part of your data directly online [here](#), where you can add to or update (correct) some of your data.

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Personal Data:

- the right to object, on grounds relating to your particular situation, to the Processing of your Personal Data by us or on our behalf, where such processing is based on Articles 6(1)(e) (public interest) or 6(1)(f) (legitimate interests) of the GDPR; and
- the right to object to the Processing of your Personal Data by us or on our behalf for direct marketing purposes.

This does not affect your statutory rights.

To assert any of the above listed rights to your Personal Data, please contact Aramco Europe at:

Aramco Europe B.V.  
Attn: Relevant business partner or Sourcing & Supplier Relationship Management Unit  
Prinses Beatrixlaan 35  
2595 AK The Hague  
The Netherlands

Email: Relevant business partner or [SRM@aramcoeurope.com](mailto:SRM@aramcoeurope.com)

Please note that:

- in some cases it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

You also have the right to lodge a complaint with your competent Supervisory Authority for the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred (see the list [here](#)).

### **Updates to this Privacy Notice**

Aramco Europe may update this Notice from time to time. We will announce any material or substantive changes via our website, or through any other means that may be appropriate depending on our relationship with you. You are encouraged to review this Notice regularly for any changes. This Notice was last updated on 6 October 2026.