

AOC PRIVACY NOTICE FOR SUPPLIERS

Aramco Overseas Company BV (“AOC BV”), a 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 AOC or of AOC’s managed subsidiaries, such as Aramco Overseas Company UK Ltd. (“AOC UK”) and Aramco Overseas Malaysia SDN. BHD (“AOM”), (AOC BV and its managed subsidiaries together referred to as “AOC”) and to ensure compliance with local data protection regulations.

This AOC Privacy Notice for Suppliers (“Notice”) covers AOC’s processing of personal data relating to:

- AOC BV’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 AOC BV registers, onboards and procures for its managed subsidiaries;

All these (potential) suppliers and (potential) business partners are hereafter referred to as “Business Partners”.

In this Notice, AOC informs you 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 AOC 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.

Personal Data Collected and Stored by AOC

Where relevant for the type of engagement or the context of the interaction with the Business Partner, AOC collects, processes 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;
- 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.

Some of the collected data may include sensitive 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 affiliates and other Business Partners or from publicly available or government issued sanctions lists and media sources.

The Purposes for Processing Your Data

AOC 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 AOC for the benefit of Saudi Aramco and AOC;
 - (b) verifying the truthfulness of Business Partner information through submitted and publicly available information about the Business Partner;

In connection with the pre-qualification and registration process to become a Business Partner for AOC, AOC carries out governance, risk and compliance screening of Business Partners. This includes customs and global trade compliance and sanctioned party list screening. AOC 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 AOC 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) assisting Business Partners with possible required travel, such as to the Kingdom of Saudi Arabia, including assistance with visas required for such travel.
- (3) For the following purposes, based on AOC or Saudi Aramco's legitimate interest(s):
 - (a) security management, 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 AOC;

- (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);
- (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

AOC 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 privacy notice. AOC 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 data. In order to safeguard your data, AOC has agreements in place with the aforementioned third parties that have access to the data. All Saudi Aramco and 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.

AOC 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 AOC, Saudi Aramco or its affiliates to defend themselves in litigation and other disputes.

AOC 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).

Finally, AOC may share your personal data with any other third party provided you have consented in writing to such disclosure.

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, AOC has entered into data transfer agreements (*e.g.*, the EU Standard Contractual Clauses) or similar safeguards with its 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”).

Retention

Information of Business Partners will be kept on file as long as AOC has a relationship with a Business Partner or to be registered with AOC as a potential Business Partner. After the relationship has ended AOC will retain the information for a period of time as may be required by law and/or to protect AOC's legal interests. AOC will not keep any information for longer than is necessary and when AOC no longer needs the information, AOC will securely destroy it in accordance with AOC's internal policies or anonymize it. Where provided by applicable law, Business Partners may request earlier deletion by contacting AOC in writing (including by email) at the address below:

Aramco Overseas Company 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

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 your personal data;
- Rectify 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;
- Portability of your personal data.

You may be able to access at least part of your data directly online at [<https://supplier.ariba.com/>] where you can add to or update (correct) some of your data.

To assert any of the above listed rights to your data please contact AOC at:

Aramco Overseas Company 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

You also have the right to lodge a complaint with your competent Supervisory Authority.

Updates to this Privacy Notice

AOC 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 18 June 2025.