



## DATA PROTECTION

### Privacy Notice – MP2 Energy LLC, d/b/a Shell Energy Solutions Recruitment

#### What does this Privacy Notice cover?

This Privacy Notice provides information about personal information which are processed by MP2 Energy LLC d/b/a Shell Energy Solutions ('Shell Energy') a company within the Shell group of companies ('Shell' or 'we') in relation to individuals who apply to work for, or who attend a recruitment event or undertake an assessment with Shell Energy. This includes prospective employees, interns and contractors.

This Privacy Notice explains **what** personal information we process about you, **why** we are processing your personal information and for which purposes, **how long** we hold your personal information for, **how to access and update** your personal information, as well as the options you have regarding your personal information and **where to go for further information**.

For individuals who are successful in their application for employment, internship or engagement as a contractor, the Privacy Notice - Shell Energy Employee, Contractor and Dependents' available at [https://login.paylocity.com/Escher/Escher\\_WebUI/employeeselfservice/home/index?area=employees&view=EmployeePortal&HelpPageQueryString=View](https://login.paylocity.com/Escher/Escher_WebUI/employeeselfservice/home/index?area=employees&view=EmployeePortal&HelpPageQueryString=View) will apply.

As well as this Privacy Notice, bespoke privacy notices and supplementary privacy statements may contain further information about how Shell Energy is processing your personal information. In those instances, such privacy notices will be communicated to you separately.

Notices are also available from the Shell Energy websites in the various locations in which we operate, in local languages and to reflect local requirements as appropriate.

#### Who is responsible for any personal information collected?

MP2 Energy LLC d/b/a Shell Energy Solutions whose registered address is C T Corporation System, 1999 Bryan Street, Suite 900 Dallas, TX 75201 USA and/or one or more of the companies within the Shell Energy group of companies.

Shell Energy **does not knowingly sell or share your personal information for cross-context behavioral advertising and/or for targeted advertising purposes.**

**Special Notice: Processing children’s personal information (if you are under 13 years old): Except in those cases where Shell organizes educational events**

specifically designed for children, we do not intentionally collect personal information of individuals under 13 years old.

**What categories of personal information do we process about you?**

We process personal information relating to individuals who apply to work for, or who attend a recruitment event and/or undertake an assessment (‘Applicants’).

This includes personal contact information, date of birth, whether you have the legal right to work in the country in which you have applied, your application for employment, your qualifications and experience, results of interviews and assessments.

**Sensitive personal information**

For the purposes of recruitment, personal information regarding health data may be processed only as strictly required and as permitted or required by local law for the purposes of making adjustments to the recruitment process, for assessing eligibility for positions and fitness to work and provision of facilities in the workplace to accommodate health problems.

In addition, we gather personal information where it is necessary for the purposes of complying with employment and social security laws including those specifically for the purposes of ensuring equal employment opportunities as required by US law, covering applicant and employee information such as gender, race/ethnicity, nationality, disability and veterans status;

**For what purposes do we process your personal information?**

We process your personal information for the following purposes:

- **Human Resources, personnel management, business process execution and internal management** - including resource planning, and recruitment;
- **Health, safety and security** - including protection of an individual’s life or health, occupational health and safety, protection of Shell Energy’s assets and staff, authentication of individual status and access rights;

- **Legal and/or regulatory compliance** - including compliance with legal or regulatory requirements; or

- **Management reporting and analysis** - including statistical analysis and surveys regarding the quality of the recruitment process.

We may also process your personal information for a secondary purpose where it is closely related, such as:

- storing, deleting or anonymising your personal information;
- fraud prevention, audits, investigations, dispute resolution or insurance purposes, litigation and defence of claims; or
- statistical, historical or scientific research.

### **Pre-screening of Applicants**

We carry out screening of all Applicants who we intend to make an offer of employment, engagement or internship (as the case may be) and prior to any offer being confirmed for the purposes of:

- verifying the information that an Applicant provides during the screening/interview process. This will include verifying information with current/previous employers and educational institutions. No steps will be taken in this respect until the Applicant confirms the verification can take place;
- screening Applicants against publicly available or government issued sanctions lists and media sources. This is to comply with legal and regulatory obligations, to protect Shell Energy's assets and employees/contractors and specifically to ensure that Shell Energy can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements.

### **Why do we process your personal information?**

We only process personal information of Applicants:

- in order to take steps at the request of the Applicant prior to entering into a contract;
- where it is necessary to comply with a legal obligation to which the relevant Shell Energy company/companies is subject to ensure compliance with applicable employment, social security laws and regulations;
- where it is necessary for the legitimate business interests of Shell Energy (such as ensuring compliance with legal obligations other than those related to employment or social security, the protection of Shell Energy assets, reputation and Shell Energy employees and contractors) except where such interests are overridden by the interests or fundamental rights and freedoms of the Applicant; or
- (only if legally required) with the explicit consent of the Applicant.

In those cases where processing is based on consent you have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of consent.

### **Who will we share the personal information with?**

Your personal information are exclusively processed for the purposes referred to above and will only be shared on a strict need to know basis with:

- Other companies within the Shell group of companies, including to those which may be located outside of your location;
- Authorized third party agents, service providers, external auditors and/or subcontractors of Shell Energy in particular authorised third parties who carry out reference and background checks on behalf of Shell Energy;
- A competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which the relevant Shell company/companies is subject to or as permitted by applicable law; or
- Any person to whom Shell Energy proposes to transfer any of its rights and/or duties.

### **Interacting with Shell Energy through social media**

If you choose to interact with Shell Energy through social media on a Shell Energy administered social media page ('Shell Energy Social Media Page') - such as Facebook, Instagram, Twitter or LinkedIn, your personal information (such as your name, your profile picture and the fact that you are interested in Shell Energy) will be visible to all visitors of your personal webpage depending on your privacy

settings on the relevant social media platform, and will also be visible to Shell Energy. You can delete any data that you shared on these sites at any time through your relevant social media platform's account. Shell Energy does not track your activity across the different social media sites that you use. If you send a message to Shell Energy via any messenger service on a social media platform, these messages are held for no longer than one month after receipt. Please contact Shell Energy if you wish to make a request that you are unable to action yourself and which relates to a Shell Energy Social Media Page - see the section below 'Your rights in relation to your personal information'.

Additionally and to the extent Shell Energy is jointly responsible with a social media platform of a Shell Energy Social Media Page, Shell Energy will have access through the social media platform to aggregated data providing statistics and insights that help to understand the types of actions you take on Shell Energy Social Media Pages. For more information on how your personal information are processed on those social media platforms, including any targeted advertising that you may receive, please refer to your privacy settings accessible through your relevant social media platform's account.

### **Transfers of your personal information to other countries**

Where your personal information have been transferred to companies within the Shell group and/or to authorized third parties located outside of of the United States of America we take organizational, contractual and legal measures to ensure that your personal information are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your personal information. These measures include contractual obligations preventing service providers from selling your personal information and Binding Corporate Rules for transfers among the Shell group. You can find a copy of Shell Binding Corporate Rules at <https://www.shell.us/privacy.html>.

### **Security of your personal information**

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use and will update these measures as new technology becomes available, as appropriate.

### **How long do you hold my personal information for?**

We hold personal information of unsuccessful Applicants for three years after the recruitment process or assessment has completed.

Information may be held for a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose).

If you are successful in your application, the personal information gathered through the recruitment process will be retained in line with the Privacy Notice - Employees', Dependants' and Contractors' Personal information, which is available at <https://www.shell.us/privacy/ex-employee-notice.html>.

### **What are the consequences of not providing your data?**

Personal information requested and provided by Applicants are required in order to fulfil legal requirements and/or which is required for entering into a contract with you (or in the case of a contractor your employer/service provider). Failure to provide us with the information requested which is limited to that required for these purposes will negatively affect your chances of being selected for any potential employment, engagement or internship.

### **Your rights in relation to your personal information**

We aim to keep our information about you as accurate as possible. Any US resident, regardless of state of residency, can request the following information:

- access to your personal information, including access to specific pieces of personal information where local law applies;
- correction, or deletion of your personal information (but only where they are no longer required for a legitimate business purpose);
- restriction and objection to the processing of your personal information under certain circumstances and where local law applies;
- to limit the collection, disclosure or use of your personal information, including sensitive personal information, if collected for unrelated purposes where local law applies;

- opt-out from the collection and use and/or to limit the disclosure or use of your personal information, including sensitive personal information if collected and where local law applies;
- opt-out from the sale or sharing of your personal information, including for cross-context behavioral advertising or for targeted advertising, if sold or shared and where local law applies;
- to no longer receive marketing communications on behalf of the relevant Business Customer, Supplier or Business Partner; and/or
- to receive personal information that you have provided to Shell Energy, in a structured, digital form to be transmitted to another party, if this is technically feasible.

### **How to exercise your rights**

To exercise any of your rights listed above, please contact [legal@shellenergy.com](mailto:legal@shellenergy.com).

### **Who can you contact if you have a query, concern, complaint, about your personal information?**

If you have any issues, queries or complaints regarding the processing of your personal information please contact [legal@shellenergy.com](mailto:legal@shellenergy.com).

You may also contact the Shell Group Chief Privacy Officer at [Privacy-Office-SI@shell.com](mailto:Privacy-Office-SI@shell.com) or Shell International B.V. The Hague, The Netherlands - Trade Register, No. 27155369 Correspondence: PO Box 162, 2501 AN, The Hague.

Without prejudice to any rights you may have in line with local law you have the right to lodge a complaint with the Dutch Data Protection Authority whose address is Prins Clauslaan 60, 2595 AJ The Hague, The Netherlands. Please visit <https://autoriteitpersoonsgegevens.nl/en> for more information.





### **Cookies and similar technologies**

Shell Energy uses cookies and similar technologies that aim to collect and store information when you visit a Shell Energy website. This is to enable Shell Energy to identify your internet browser and collect data on your use of our website, which pages you visit, the duration of your visits and identify these when you return so that we improve your experience when visiting our website(s). You can control and manage your cookies preferences by adjusting your browser settings or using the Shell Energy cookies preference tool on Shell Energy websites - for more information, please refer to the Shell Energy Cookie Policy at <https://www.shell.us/cookie-policy.html>.

### **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice periodically and without notice, for example, when a new category of personal information is collected and used and upon changes/enactment of data protection and privacy laws. You are advised to regularly review this Privacy Notice for possible changes. For significant or material changes to this Privacy Notice, we will prominently post such changes on this page and update the revision date to provide awareness. This Privacy Notice was last updated in October 2023.