



IMDEX is committed to protecting the privacy of individuals and their personal information in accordance with relevant privacy laws.

This policy sets out how IMDEX collects and processes personal information.

1. How to contact us

If you would like to contact us regarding this policy, or your personal information please contact IMDEX's Data Privacy Offer at legal@imdexlimited.com.

2. Who we collect personal information from

We collect and process personal information when you engage with our business, our website, as part of you obtaining goods and services from us, or as part of us obtaining goods or services from you.

More specific examples of the kinds of people we gather personal information from include job applicants, employees, shareholders, users of our website, goods or services, and representatives of our customers, suppliers, industry associations, sponsored entities, third party representatives, and business partners.

3. What personal information we collect

We only collect personal information that is necessary for the conduct of our business. As much as possible, we collect personal information directly from you. If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this.

We collect the following kinds of personal information:

- a. Identification data – this includes information such as your name, job title, photograph, and date of birth (this may also include collecting copies of documents such as your driver's licence, passport, or birth certificate).
- b. Contact details – this includes information such as your address, email address, or telephone number.
- c. Engagement related information – this includes information such as your name, email address, location, telephone number, qualifications, professional experience, types of engagement you are interested in, any application, tender, resume, CV, or other information you may have provided as part of a request, or offer, to engage with us. We may also collect information necessary to undertake due diligence relating to that engagement. The kind of information this may collect will depend on the nature of the due diligence being undertaken. Your consent will always be obtained at, or around, the time of collection of personal information for such due diligence.
- d. Credit related information – in connection with supplying you with goods or services we may collect and process any relevant credit information, such as supply, payment or billing information, bank account details, direct debit, credit card details, billing address, repayment information and invoice details.
- e. Access information – this includes information associated with you accessing our websites and services, such as usernames, passwords, and information collected by cookies.
- f. Usage information – this includes information we collect when you use our websites, goods, or services such as server log information (including your IP address, browser type, operating system, browser language, time zone, access times and any referring addresses), location information, and other data relating to your use of our websites, goods, or services by way of cookies or similar technology.
- g. Location or attendance information – this includes information recording access or attendance at

IMDEX premises (such as security records about times of entry and exit, and information collected through CCTV), and details regarding your use of physical spaces in which we operate.

- h. Shareholder information – this includes information such as the contact details for any person who owns shares in IMDEX, information relating to the transfer of shares, and information that is necessary for the efficient trading, management, and administration of IMDEX shareholdings.
- i. Communication information - this includes information such as your opinions, statements, complaints, concerns, or endorsements that you provide to us, that we collect via surveys and questionnaires, or which you otherwise make publicly available.

We may also collect certain types of sensitive personal information when we engage you as an employee, customer, supplier, industry association, sponsored entities, third party representative, or business partner, where you volunteer such information, or if it is necessary for purposes of collection set out in part 4. Your consent will always be obtained at, or around, the time of collection of such sensitive personal information. The kind of sensitive personal information we collect and process includes interview notes, references, results of any psychometric or other medical tests, and information gathered as part of due diligence or background checks (including criminal records, anti-bribery, corruption, or sanctions checks), information relating to any work you may undertake for us, and information to verify your identity, capacity, and right to work.

4. How we process personal information

We may process personal information for the following purposes:

- a. Business related purposes such as providing you with goods or services, engaging with, or managing our relationships with customers, suppliers, industry association representatives, sponsored entities, third party representatives, and business partners, administering and managing our business, making and receiving payments, pursuing debts, conducting litigious matters, or dealing with your inquiries and requests.
- b. Marketing or communications related purposes such as, providing you with information about our goods, services, or events, notifying you about important changes or developments to our website, or other direct marketing.
- c. Analysis and business development purposes such as analysing the way in which you engage with our business, our website, how you obtain or use our goods or services, or how we obtain or use your goods or services.
- d. Engagement related purposes such as assessing a request, or offer to engage with us, undertaking reasonable due diligence relating to that engagement including, psychometric or other medical tests, integrity checks (including credit, criminal records, anti-bribery, corruption, or sanctions checks), or managing any contract relating to any such engagement.
- e. Shareholder related purposes such as undertaking share transactions, dividend payments and communications with shareholders, and any other purpose necessary for the efficient trading, management, and administration of IMDEX shareholdings.
- f. Security and safety related purposes such as monitoring how people use our website, goods, or services, or locations in which we operate, verifying your identity, and ensuring we have adequate security and safety measures in place.
- g. For a purpose related to the primary purpose of collection detailed above, where you would reasonably expect your personal information to be used or disclosed for such a purpose.

5. Transfer and storage of personal information

We may store or transfer personal information with third parties outside of IMDEX, and to destinations in which we, or those third parties operate. Such transfer or storage may involve information being transferred to, or stored at, a destination other than where it was originally gathered, including outside Australia, and the EEA.

The main jurisdictions in which we operate are Australia, Argentina, Brazil, Bulgaria, Canada, Chile, Colombia, Ecuador, Finland, Germany, Ghana, Hong Kong, Indonesia, Mexico, Norway, Netherlands, Philippines, Peru, Romania, South Africa, Sweden, United Kingdom, United States of America, and United Arab Emirates. Of these

destinations, the United States of America, Canada and the United Kingdom have received an adequacy decision from the European Commission.

Personal information may also be processed by third parties we engage with who operate outside of Australia or the EEA, including our customers, suppliers, industry associations, sponsored entities, third party representatives, and business partners.

If we need to disclose personal information to third parties in a different country to where the information was collected, we will take steps to ensure that there is a lawful basis for any disclosure, and that the disclosure complies with all applicable laws. This may include entering into a legally binding contract with the recipient of any information requiring them to handle your information in accordance with applicable laws.

If you do not agree to the transfer or storage of your personal information outside Australia or the EEA, please contact us via the details set out at the top of this Policy.

We store personal information only for so long as it is required by our business. To determine the appropriate retention period for personal information, we consider:

- a. the amount, nature and sensitivity of the personal information;
- b. the potential risk of harm from unauthorised use or disclosure of the personal information;
- c. the purposes for which we process the personal information;
- d. whether we can achieve those purposes through other means; and
- e. applicable legal requirements.

6. Your choices and rights

You have choices available to you in relation to how we collect and process of your personal information, such as your preferences in relation to:

- a. disclosure of your personal information to third parties;
- b. the frequency, subject matter and format of communications you receive from us; and
- c. the type of cookies, if any, that we collect from you.

You also have rights in relation to your personal information, such as the right to:

- a. request access to your personal information and to receive the personal information you have provided us in a structured, commonly used and machine-readable format;
- b. request deletion of your personal information;
- c. request correction of your personal information, if it is incorrect, and request we notify any third parties we have shared that information with of the correction;
- d. request restriction on processing or object to the processing of your personal information;
- e. request your personal information be transferred to another person;
- f. not identify yourself or use a pseudonym;
- g. request not to receive direct marketing from us; and
- h. withdraw consent to use your personal information for a particular purpose.

Wherever possible we will alert you to the ways in which you can exercise these choices, or rights at the time of collection of your personal information. You can also communicate your preferences in relation to the choices and rights described in this part by using the contact information at the top of this Policy.

7. Complaints

If you have any concerns or complaints about our collection or processing of your personal information, you can contact us using the contact details at the top of this Policy.

Upon receipt of a complaint, we will:

- a. liaise with you to identify, and define the nature of your complaint (and may request that you provide

further details of the complaint in writing);

- b. keep you informed of the likely time within which we will respond to your complaint;
- c. provide you with a substantive response to your complaint; and
- d. keep a record of the complaint and any action taken in a register of complaints.

If you are not satisfied with the way we have handled your personal information or a complaint in relation to our handling of your personal information, depending on the jurisdiction in which you are located you may have the right to make a complaint to a supervisory body. We will advise you of your formal external appeal options in the event these are available to you.

8. Updates to this policy

We will regularly review and update this policy. If you do not agree to our continued use of your personal information in accordance with those updates, please contact us via the details set out at the top of this Policy.

9. Definitions

Terms used in this policy have the following meaning:

Cookies are small files stored by a browser on your equipment's hard drive. They send information stored on them back to our web server when you access or use our website. Cookies enable us to put in place personal settings and load your personal preferences to improve your experience.

EEA means the European Economic Area.

IMDEX means Imdex Limited, its group entities as listed in part 10, and any future subsidiaries which may be added from time to time.

Personal information means any information about an identified or identifiable person. This includes where you can be identified, directly or indirectly, including by reference to an identifier (for example, a name or email address, or an online identifier such as a unique device identification number), and Sensitive personal information.

Process or **processing** describes the various things we may do with your personal information – including using, disclosing, holding, recording, storing, transferring or otherwise handling that information.

Sensitive personal information means personal information (including information or an opinion) about an individual's racial or ethnic origin, political opinions and memberships, religious or philosophical beliefs or associations, trade union membership, criminal record information, genetic data, biometric data (processed for the purpose of uniquely identifying a natural person), gender or sexual orientation, health or the health services a person has received.

10. List of group entities

EEA registered entities:

- AMC Europe GmbH
- Devico AS
- Devico Bulgaria EOOD
- Devico Finland Oy
- Devico Sweden AB
- Imdex Global B.V.
- Devico USA AS
- Devico International Operation AS

Other group entities:

- AMC Drilling Fluids & Products–Mexico, S. de RL de C.V.

- AMC Reflex Argentina S.A.
- AMC Reflex Peru SAC
- AMC USA LLC
- AMCREFLEX CIA. LTDA
- Ausspec International Limited
- Australian Mud Company Pty Ltd
- Devico Asia Company Limited
- Devico Chile SpA
- DevicoEC. S.A.
- Devidrill Mexico S.A. DE C.V.
- Dhs (Aust) Pty Ltd
- Flexidrill Construction Limited
- Flexidrill Limited
- Imdex Africa Pty Ltd
- Imdex Canada Limited
- Imdex Do Brasil Industria e Comercio Ltda
- Imdex Global B.V.
- Imdex Global Operations Pty Ltd
- Imdex International Pty Ltd
- Imdex South America S.A.
- Imdex Technologies Pty Ltd
- Imdex Technology USA LLC
- Imdex USA Inc
- Krux Analytics Inc
- Reflex Instrument South America SPA
- Reflex Instruments Asia Pacific Pty Ltd
- Reflex Instruments Europe Limited
- Reflex USA LLC
- Samchem Drilling Fluids and Chemicals (Pty) Ltd
- Styr Brasil Perfuracoes Ltda
- Styr SpA
- STYRDCCD S.A.C.