

Privacy Notice for those engaged by Shell Foundation

Shell Foundation (“**SF**”, “**our**” “**us**”, or “**we**”) is the “data controller” in respect of your personal data. This privacy notice sets out the basis on which SF collects and processes your personal data on SF’s systems. Please read the following carefully to understand our practices regarding your personal data and how it will be treated.

1. WHO DOES THIS POLICY APPLY TO?

This privacy policy applies to all those who are engaged by SF. This includes secondees, contractors, interns or temporary staff who are associated with SF. We refer to this as “you” throughout this notice.

2. HOW AND WHEN WE COLLECT PERSONAL DATA ABOUT YOU

We will receive most of this personal data from **you directly**. For example, through:

- from you when you log on to our Systems such as Abeceder to confirm certain details;
- from correspondence with you; and
- for right to work checks, you may provide a copy of your passport..

Although we may also receive some of this information from **third parties**, such as recruitment agencies, search firms, employers of record and our company affiliates including Shell PLC via their separate HR System. For example:

- for secondees from Shell PLC and those who work for SF exclusively, Shell PLC may provide us with your CV.
- if you are recruited via an agency, or an employment company of record, we may receive your CV from such third parties.

We also may receive some personal data from third parties that help us such as First Assist who carryout background checks on our behalf.

In some cases we may collect your personal data from commercial available or publicly available sources such as sanction lists.

For more information on how Shell PLC collect and process your personal data, please contact paul.waite@shellfoundation.org

We will also collect additional personal data in the course of job-related activities throughout the period of you are engaged by us.

3. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU

We may collect the following personal data from **you directly**:

- name
- contact information (including telephone numbers and email address)
- marital status;
- nationality
- gender
- holidays and absences you request to book – this may include some health personal data
- Any information about data relating to an individual’s health (such as disabilities), their racial or ethnic origin, religious or philosophical beliefs, sexual orientation, if you choose to tell us and record it on our systems such as Abeceder
- information about your conflicts of interest
- Information on your passport in order to complete right to work checks and visa applications for those who are required to travel during their engagement with SF

- Any personal data in the course of job-related activities throughout the period of you are engaged by us such as correspondence and feedback
- Next of Kin information

We may collect the following information from the **third parties listed above**:

- Any information provided on your CV
- personal home contact information
- date of birth
- marital status
- payroll and bank account information
- wage and benefit information including beneficiary information
- emergency contacts
- work performance information
- information required to ensure you have the right to work in the country/ies you are engaged in
- other information necessary for managing the employment relationship, for engaging contractors such as background checks conducted by our third parties such as First Assist.

4. PURPOSES AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We may process your personal data for the following purposes:

Purpose/Activity	Lawful basis for processing
To maintain a record of your holidays and absences	It is our legitimate interest to ensure we manage workforce schedules, ensuring proper staffing levels and to operate SF.
To maintain a record for diversity and inclusion	We rely on your explicit consent to record such personal data. It is optional to confirm such personal data on our Systems such as Abeceder and you can withdraw such personal data at anytime.
For your travel and expenses	It is in our legitimate interests and the legitimate interest of Shell PLC to process your personal data to ensure you can travel and reimburse your expenses. Such interests include: visa applications for those who are required to travel during their engagement with SF.
To conduct employment related checks such as conflict of interests, right to work and background checks	<p>In order for our:</p> <ul style="list-style-type: none"> • compliance with legal and regulatory obligations; and • legitimate interests which include to protect SF's, its affiliates assets, our third parties and you; <p>For example, to ensure that we can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening on a periodic basis. This screening takes place against publicly available or government issued sanctions lists and is compared with information held about you by SF (for example from the Conflict of Interest register).</p> <p>Our legitimate interests also include for the safeguarding of the vulnerable people that you may work with.</p>

For workforce planning, recruitment, and business management, including disaster recovery and emergency response planning business forecasting, workforce assignment planning and budgeting, job advertising, interviewing, selecting and hiring staff. General head count reporting, accounting and auditing; maintaining internal organisational charts and personnel/contact databases and contact details	It is in our legitimate interests and the legitimate interest of Shell PLC to process personal data for workforce planning, business management and recruitment. Such interests include for the operation of our business and for business continuity.
To conduct performance reviews, manage performance and determine performance requirements, performance awards (including promotions and assessing qualifications) making arrangements for the termination of our working relationship.	It is in our legitimate interests and the legitimate interest of Shell PLC to process personal data for attracting and retaining talent, effective business operations, management of workforce and effective business operations.
In connection with grievance, disciplinary or capability hearings	It is in our legitimate interests and the legitimate interest of Shell PLC to process personal data to deal with internal processes and the management of workforce
To make decisions about your continued engagement.	It is in our legitimate interests and the legitimate interest of Shell PLC to process personal data for the management of workforce and effective business operations
For education, training and career development requirements (including quality improvement).	It is in our legitimate interests and the legitimate interest of Shell PLC to process personal data for training, development and effective business operations
To deal with legal disputes involving you, or other staff or third parties, including accidents at work	It is in: <ul style="list-style-type: none"> • our legitimate interests and the legitimate interest of Shell PLC to process personal data to respond to and defend legal disputes/claims involving you or others, manage our risks and protect us and others; and • compliance with legal obligations that we must comply with related to legal disputes.

5. WHERE WE STORE YOUR PERSONAL DATA

The data we collect will be processed and stored on our Systems. For example, in the UK by Abeceder who are based in West Yorkshire, UK with hosting servers in York'

However, in some instances, the personal data that we collect may be transferred to, and stored at, a destination outside the EEA or the UK, including countries, which have less strict, or no data protection laws, when compared to those in the EEA or the UK.

Whenever we transfer your data as described in the paragraph above, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal data and to make sure it is treated securely and in accordance with this privacy notice. In these cases, we rely on approved data transfer mechanisms (such as standard contractual clauses) to ensure your data is subject to adequate safeguards in the recipient country.

You may use the contact details below to contact us for a copy of the safeguards which we have put in place to protect your personal data and privacy rights in these circumstances.

6. HOW WE KEEP YOUR PERSONAL DATA

We take steps to ensure that the personal data that you provide is retained for only as long as it is necessary for the purpose for which it was collected.

Where we have collected the personal data based on your consent and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent then we will stop processing your personal data.

7. DISCLOSING YOUR DATA

We may share your personal data within our group of companies and affiliates such as Shell PLC for legitimate interests such as operating our business and Shell PLC's business .

We may also share data with authorised third party service providers, such as First Assist who carryout background checks on our behalf.

Situations may arise in which we must share your data with other third parties. For example in one or more of the following circumstances:

- when required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement agency;
- to seek legal advice from our external lawyers or in connection with litigation with a third party;
- in connection with the sale, purchase or merger of SF; and/or
- to provide a third party (such as service providers) with a means of contacting you in the normal course of business, for example, by providing your contact details.

8. YOUR RIGHTS

You have certain rights in relation to your personal data. These include: the right to object to the processing of your data for certain purposes, the right to access your personal data, and the ability to erase, restrict or receive a machine-readable copy of your personal data.

We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions. If you wish to exercise any of these rights please contact us using the contact details below.

You may also have the right to complain to a data protection authority (such as the Information Commissioner's Office (ICO), the UK supervisory authority <https://ico.org.uk/make-a-complaint/>) if you think we have processed your personal data in a manner which is unlawful or breaches your rights. If you have such concerns we request that you initially contact us (using the contact details below) so that we can investigate, and hopefully resolve, your concerns.

9. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect changes in our data processing practices or legal obligations. We will notify you of any material changes by posting the updated Privacy Notice on our

SharePoint intranet and our other systems (such as Abeceder) or by other appropriate means such as by e-mailing you. We encourage you to review this Privacy Notice periodically to stay informed about how we collect, use, and protect your personal data.

10. CONTACT US

Questions and comments regarding this privacy notice should be sent to: paul.waite@shellfoundation.org

Our offices are Shell Foundation, Embassy Tea House, 195-205 Union Street, London SE1 0LN, United Kingdom.

This Privacy Notice was last updated on 02 February 2024