

## **Shell Applications: Privacy Policy**

We respect the privacy of everyone who uses this application. Please read this Privacy Policy carefully to ensure that you understand our approach and practices in respect of the collection and processing of your personal data.

**By downloading the Shell Marine Products application (the “Application”) you confirm that you have read, understood and agreed to Shell processing your personal data in accordance with the provisions of this Privacy Policy.**

If you do not agree to the provisions of this Privacy Policy, please do not access or use the Application.

### **1. Who is responsible for the personal information collected?**

1.1 For the purpose of current Vietnamese regulations on data privacy protection, the data user is Shell Vietnam Limited a company registered in Vietnam, having its registered office at Go Dau Industrial Zone, Long Thanh District, Dong Nai Province, Vietnam (“Shell”).

### **2. What does this Privacy Policy cover?**

2.1 This Application requires you to provide Shell with personal and non-personal information. Personal information includes information that could identify a specific individual (such as names, addresses and e-mail addresses). This Privacy Policy covers Shell’s use of your personal information, and of your non-personal information, which is collected through or in connection with this Application.

### **3. User Restrictions**

3.1 This Application is not aimed at children under 15 years old and we will not collect, use, provide or process in any other form any personal information of children under the age of 15 deliberately. We therefore also ask you, if you are under 15 years old, please do not send us your personal information (for example, your name, address and email address). If you are under 15 years old and you nevertheless wish to ask a question or use this Application in any way which requires you to submit your personal information please get your parent or guardian to do so on your behalf.

### **4. Information Shell may collect and store**

4.1 The information collected and processed by or on behalf of Shell via the Application includes the following:

(a) Submitted Information

Information that you provide in registering for and using the Application (including mandatory information such as your name and email and non-mandatory information such as your date of birth and gender).

If we ask you to sign up and log in using the credentials (username and password) of your Online Social Identity Provider (“**Provider**”) we will share certain information from your Provider account. Which information is shared with us is subject to the Terms and Conditions you have agreed with your Provider and your private settings in your Provider account, but will at least contain your email-address, first name, last name and your date of birth.

Submitted information also includes information that you provide in subscribing for any services or reminders (e.g. which country or language you chose in entering a contest, posting material or requesting further services).

(b) User Generated Content

User Generated Content that you post or otherwise make available on or through the Application.

(c) Device information

Information about the device you use to download or stream the Application, including, where available, the type of device that you use, the device's unique device identifiers, operating system and/or mobile network information.

(d) Application use information

Information regarding the frequency with which you use the Application, clickstream data (e.g. landing, viewed and exit pages), the nature of such use and any feedback as to your experience of using the Application.

(e) Log information

Shell may automatically collect and store certain information in server logs including but not limited to internet protocol (IP) addresses, and timestamps.

(f) Location and route information

When you use one of the Application's location-enabled services, Shell may collect and store information about your actual location and routes. This includes using the Application to “check-in” at a Shell site.

(g) Device Data

Shell may store personal data on your device using application data caches.

(h) Loyalty Customer information

If you are a Loyalty customer, your Loyalty card details and associated use of the Loyalty function(s) within the Application.

(i) Cookies

Information about visits on our website, for further information see Clause 8.

(j) Login Information

Shell may automatically track and store information including the frequency with which you login to the Order Tracking portal within the Application including the username that you use to login. Note, this information is not linked to any personal information which could be used to identify a specific individual.

(k) Other information

Shell may ask you for additional information, e. g. when you enter a competition or promotion sponsored by Shell and, if you contact Shell, a record of that correspondence may be kept.

## 5. Use of information

5.1 Shell may use the information collected and/or provided via **Google Analytics** for the following purposes:

- a) to conduct market research and tracking of data and preferences, including but not limited to analysing your usage of the Application;
- b) to **follow up with you on our products and or services** that may meet your needs;
- c) to **provide customized** marketing communications to you;
- d) to provide you with specific information;
- e) to respond to queries or requests submitted by you;
- f) to anticipate and resolve problems with the Application;
- g) for system administration and optimization;
- h) for security purposes (eg: to monitor unauthorised account access);
- i) to improve the Application's performance and efficiency;

5.2 The information Shell obtained from you via the Application (as detailed in Clause 4.1 above) may be shared across the Shell Group of companies and combined with information that Shell already has about you or with information we receive from other sources e.g. public registers such as the electoral roll. Shell may process this combined information for any of the purposes detailed in Clause 5.1 above.

5.3. We may use and share anonymised information outside of the Shell Group, however, we would like to reassure you that this never includes your personal information.

5.4 Additionally, if at any time you wish us to stop using your information for any or all of the above purposes; please contact us as set out below. We will stop the use of your information for such purposes as soon as it is reasonably possible to do so. In this case you won't be able to use the app further.

5.5 Shell may use the Application to communicate specific offers via 'push' notifications delivered directly to your device. If Shell will use this option you will be asked whether you wish to receive the push notifications when you download the Application or a updated version of it. If you choose to receive the push notifications but decide at a later stage that you no longer wish to

receive the push notifications, you can disable them within the 'Info & Settings' function of the Application.

- 5.6 **By accessing and using the Application you confirm that you have read this Privacy Policy and consent to Shell collecting, using, processing and sharing your personal data in the manner and for the purposes set out in this privacy policy.**

## **6. Disclosure of information**

6.1 Shell may disclose the information collected and/or provided via this Application to third parties as follows:

- a) in order to enforce, apply or investigate potential breaches of Shell's Terms and Conditions of Use;
- b) in the event third persons are involved in the services provided by the Application Shell may forward information to enable these third persons to perform the services;
- c) in order to process Shell's own marketing communications;
- d) in order to protect the rights, property or safety of Shell, other users or third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection;
- e) in order to comply with any legal, judicial or regulatory obligation or request or for the prevention of crime;
- f) in the event that Shell sells or buys any business or assets, in which case Shell may disclose your personal data to the prospective seller or buyer of such business or assets;
- g) within the Shell Group, which means Shell's subsidiaries and Shell's ultimate holding company and its subsidiaries.

6.2 Except as set out in this Privacy Policy, Shell will not disclose any personal data which relates to you, and which has been collected and/or provided via the Application, without your permission unless:

- a) Shell is legally required or entitled to do so; and/or
- b) Shell believes that such disclosure is necessary to protect and/or defend the rights, property or personal safety of itself and/or other users or customers.

## **7. Transfer of data**

7.1 Any personal data provided to Shell via this Application may be transferred to other members of the Shell Group or (occasionally) selected third parties, which may be located outside of Vietnam. By way of example, this may happen if any of our servers are from time to time located in a country outside of Vietnam or one of our service providers is located in a country outside of Vietnam.

7.2 These third parties will not use your personal information for any other purposes than what we have agreed with them. Shell requests those third parties to implement adequate levels of

protection in order to safeguard your personal information. We respect your personal information and therefore, we will take steps to ensure that your privacy rights continue to be protected if we transfer your information outside of Vietnam in this way. In addition, if you use our services while you are outside Vietnam, your information may be transferred outside Vietnam in order to provide you with those services.

- 7.3 Except as set out in this privacy policy, we will not disclose any personally identifiable information without your permission unless we are legally entitled or required to do so (for example, if required to do so by legal process or for the purposes of prevention of fraud or other crime) or if we believe that such action is necessary to protect and/or defend our rights, property or personal safety and those of our users/customers or other individuals.
- 7.4 Please be assured that we will not use your information for any of the purposes if you have indicated that you do not wish us to use your information in this way when submitting the information or at a later stage.
- 7.5 **By submitting your personal data, you agree to that data being transferred outside of Vietnam in accordance with the terms of this Clause.**

## **8. Cookies**

- 8.1 We use the term “cookies” to refer to cookies and other similar technologies covered by the EU Directive on privacy in electronic communications.

### ***What is a cookie?***

- 8.2 Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files.
- 8.3 When a server uses a web browser to read cookies they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

### ***Why do we use cookies?***

- 8.4 We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our Application or websites.
- 8.5 Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms.
- 8.6 Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer. For further details on the various types of cookies that we use, please read our cookie policy.

### ***How are third party cookies used?***

- 8.7 For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third party websites for information regarding their use of cookies. For further details on the third party cookies that we use, please read our page on cookie types.

### ***How do I reject and delete cookies?***

- 8.8 We will not use cookies to collect personally identifiable information about you. You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual.
- 8.9 You will be asked whether or not you consent to the use of cookies when you download this Application. You can also erase or block this information by changing the settings on your device (please refer to your help screens or manuals). If you do erase or block this information you may not be able to utilise some features of the Application or websites.
- 8.10 In case we engage third parties to assist us in serving cookies, they are not permitted to use the information collected except to help Shell conduct and improve its business.

## **9. Feedback and forum facilities**

- 9.1 If at any time this Application offers any feedback and/or forum facilities (or similar), Shell may collect the information that you disclose in using such facilities. Such information will be used in accordance with this Privacy Policy. Please note that Shell cannot be responsible for other parties' use of the personal information which you make available to such third parties through any feedback or forum facilities in this application. **Please be careful about what personal information you disclose in this way.**

## **10. Third party applications or websites**

- 10.1 Shell cannot accept responsibility for the privacy policies and practices of third party applications or websites, even if you accessed the third party application or website using links provided by the Application or linked to the Application via a third party application or website.
- 10.2 Shell recommends that you check the policy of each application or website you visit and contact the owner or operator of such application or website if you have any concerns or questions.

## **11. Keeping Shell's records accurate**

11.1 Shell aims to keep its information about you as accurate as possible. If you would like to review or change the details you have entered into the Application, you can do so by using the 'Edit' function to be found within 'Info & Settings'. In the event you wish to edit information supplied to Shell which cannot be edited using this function, please contact [SITI-MLM-Support@Shell.com](mailto:SITI-MLM-Support@Shell.com).

## **12. Collection of non-personal information**

12.1 We may automatically collect non-personal information about you such as the type of internet browsers you use or the website from which you linked to our Application or website. We may also aggregate details which you have submitted (for example, your age and the town where you live). You cannot be identified from this information and it is only used to assist us in providing an effective service. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with this Application.

## **13. How to opt-out, modify information you have provided to us and delete your account**

13.1 If you wish to modify your account information, change your preferences, opt-out of receiving push notifications or any other messages or completely delete all of your Shell online account information from our database you can do so in the relevant setting function at any time.

13.2 Please be aware that your account information may persist in backup copies for a reasonable period of time even after you have deleted your account also subject to legal preservation duties.

## **14. Security of your personal data**

14.1 Shell has implemented technology and policies with the objective of protecting your privacy from unauthorized access and improper use and will update these measures, as appropriate, as new technology becomes available.

14.2 Although Shell strives to protect your personal information, unfortunately, the transmission of information via the internet is not completely secure. Although Shell will do its best to protect your personal information, it cannot always guarantee the security of this information. Any transmission of information is therefore made at your own risk. Once Shell has received your personal information, it will, however, use strict procedures and security features to try to prevent unauthorized access.

## **15. Terms and Conditions**

15.1 Please take also notice of our General Terms and Conditions of Use providing the use, disclaimers, and limitations of liability governing the use of this Application.

**16. Changes to this Privacy Policy**

16.1 From time to time Shell may make changes to this Privacy Policy. If Shell makes any changes to this Privacy Policy and the way in which your personal data is used, you will be asked to accept those revised Privacy Policy when you next use the Application. Any use of the Application thereafter will be on the basis of those revised Privacy Policy.

**17. How you can contact us**

17.1 If you would like to contact Shell about this Privacy Policy, please contact [SITI-MLM-Support@Shell.com](mailto:SITI-MLM-Support@Shell.com).