
PRIVACY NOTICE

BACKGROUND:

Wildcat Petroleum Plc (“Wildcat”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone we do business with.

This Privacy Notice explains which personal data we collect from you, how we store it and use it. It also covers how we treat information you give to us, and information we obtain from third parties. Please read this Privacy Notice carefully to understand how we treat your personal data.

Please note that this Privacy Notice applies only to how Wildcat uses your personal data. We have no control over how your data is collected, stored, or used by third parties including any websites we may link to and we encourage you to check the privacy policies and notices of any third parties.

1. Information About Us

Any reference to “us”, “our”, “we” or “Wildcat” is a reference to Wildcat Petroleum Plc, a public limited company registered in England under company number 12392909. Our registered office is Fingate, 5-7 Cranwood Street, London EC1V 9EE.

We are committed to our privacy obligations under the Data Protection Act 2018 and the General Data Protection Regulation (“Data Protection Laws”). We are the data controller as defined by the GDPR.

2. What Is Personal Data?

Personal data is defined by the Data Protection Laws as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Put simply, personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

3. What Personal Data Do We Collect and How?

From our website, Wildcat collects certain information automatically, including your IP address used to connect your computer to the internet, your login details, the type of browser you are using and certain other non-personal data about your computer or device such as your operating system type or version, and display resolution.

Wildcat may hold the following types of information about you.

- Information that helps identify you (e.g. your name; alias (if any) age; date of birth; gender; country of residence; passport details; citizenship).
- Personal identification numbers (e.g. social security numbers; national insurance numbers).
- Family circumstances information (e.g. your marital status and dependents) if you are a PEP or a close associate of a PEP.
- Employment/role and education details (for example, the organisation you work for, public roles (including political, diplomatic, religious, judicial, military and trade union roles), your job title and your education history).
- Professional and personal affiliations (for example, organisations (including sanctioned vessels and aircraft) and individuals that you may be associated with in your professional or personal capacity).
- Financial information relevant to understanding your income or wealth (for example, bankruptcy or insolvency filings).
- Your inclusion (if any) on sanctions lists or on public lists of disqualified directors or other positions of responsibility.
- Public domain data about actual or alleged money laundering or terrorist financing crime, or crimes that are a pre-cursor to money laundering or terrorist financing which are also known as predicate offences (e.g. financial crime, illegal trafficking, environmental offences, smuggling, membership of an organised crime group). Examples include personal information found on: (i) sanction or watch lists; (ii) law enforcement, court, regulatory or other government websites; (iii) political websites and publications such as parliamentary, local government or individual politician websites; (iv) reputable news media and publications; and (v) information sources made public by an individual themselves, for example on their website, blog or any social media application.
- Your postings on website, blogs or social media applications.

If you send us an email, or we send you an email, we may collect your name, your email address, and other contact information. It can also include your financial information and other personal details such as your National Insurance number. We will also collect personal data directly from you in order to verify your identity, such as your passport.

We may receive information about you from third party service providers such as credit reference agencies, fraud detection agencies and registration or stockbroking industry exchanges. Our background searches may also include third party social media services such as Google, LinkedIn and Facebook, commercially available sources. We do not control the information on you that such networks obtain, or the technology they use to do so

Some of the personal data we collect about you or which you provide to us may be special category data. We generally process special category and criminal data for reasons of substantial public interest on the basis of applicable law. Special categories of data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, religious and/or philosophical beliefs, trade union memberships, criminal convictions and offences, genetic and biometric data, and health data including gender. We take special care with this data.

4. How Do You Use My Personal Data?

As stated above, we do not generally collect any personal data directly from you, but if you contact us and we obtain your personal details from your email, we may use them to respond to your email or to notify you about any changes we make to our service. The other technical data referred to above is necessary for the technical operation of Our Site and will not normally be used in any way to personally identify you.

We may also use your personal data to comply with our legal and regulatory obligations, co-operate with our regulators and law enforcement agencies, and to prevent and detect money laundering and financial crime.

5. What is your legal basis for using my personal data?

We must have a legal basis (i.e. a valid legal reason) for using your personal data. Generally, our legal basis will be one of the following:

- **Legitimate interests:** we sometimes collect and use your personal data because we have a legitimate reason to have it (for example for the proper operation of Our Site) and this is reasonable when balanced against your right to privacy. For example, one of our legitimate interests is to run and develop our business, and ensure a safe environment for our Site visitors.
- **Where it is necessary for the performance of a contract:** where we have a contract with you, we will process your personal information in order to fulfil that contract.
- **Legal obligations:** in some cases, we will have a legal responsibility to collect and store your personal data (for example under money laundering regulations we must hold certain information about you).
- **Consent:** where you have agreed to us collecting your personal data, for example you have ticked a box on a form. We may use your special category data (such as health information) where you have provided your consent (which you may withdraw at any time).

6. How and Where Do You Store My Data?

We usually store your personal data on secure servers in the UK. This means that it will be

fully protected under the Data Protection Laws. In order to protect your personal data, we will:

- limit access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensure that they are subject to duties of confidentiality;
- have in place procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

The internet is an open medium and we cannot guarantee that any information you send to us by email or via Our Site will not be intercepted or tampered with. Any transmission is at your own risk. However, once we receive your personal data we use strict procedures and security features to try to prevent unauthorised access.

7. Do You Share My Personal Data?

We may share your personal data with third parties, including but not limited to, credit reference agencies, software providers, or our professional network such as lawyers, auditors, consultants or their agents, that help us to improve and optimise Our Site.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party.

When your personal data is shared with a third party it may mean that your data is transferred outside of the EEA. Where this is the case, we will take all steps reasonably necessary to make sure that your personal data is treated securely. For example, if your information is sent to the United States, in accordance with Articles 45 and 46 of the GDPR, we will do our best to ensure that your data is transferred to a third party that is part of the Privacy Shield, so that your personal data is protected to the same standards as it is in the EEA. For information purposes, the Privacy Shield is the framework that sets privacy standards for information sent between the United States and European countries, and it uses similar standards as the EEA.

8. What Are My Rights?

Under the Data Protection Laws, you have the following rights:

- a) The ***right to be informed*** about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.

- b) The **right to access** any personal data we hold about you. You can ask us for a copy of your personal data; confirmation whether your personal data is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area (EEA).
- c) The **right to have your personal data rectified** if any of your personal data held by us is inaccurate or incomplete.
- d) If you feel we should no longer be using your personal data you can **request that we delete the data** that we hold. Upon receiving a request for deletion, we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest).
- e) The **right to request restriction** (i.e. prevention) of the processing of your personal data. This enables you to ask us to suspend the processing of your personal data: a) if you want us to establish the data's accuracy; b) where our use of the data is unlawful but you do not want us to erase it; c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims; or d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- f) The **right to object to processing** of your personal data. You may request that we stop processing information about you. Upon considering your request we will let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights, or to bring or defend legal claims.
- g) The **right to withdraw consent**. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The **right to data portability**. You have the right to ask us to provide your personal data to another data controller or third party provider of services.
- i) **Rights relating to automated decision-making and profiling**. We do not use your personal data in this way.

For more information about our use of your personal data or if you would like to exercise any of your rights as outlined above, please contact us using the details provided in Section 10. We will comply with your request where it is possible to do so, within 30 days of receiving your request. There are no fees or charges for the first request to access your data. However, additional requests for the same data may be subject to an administrative fee of £25 per request.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please let us know.

If you have any cause for complaint about our use of your personal data, we would welcome

the opportunity to resolve your concerns ourselves in the first instance, so please contact us initially using the details in Section 10.

Alternatively, if you feel we have not resolved your issue or complaint, it is your right to contact the Information Commissioner's Office (the UK's lead Data Protection Authority) and make a complaint. For more information, please visit the Information Commissioner's Office website at <https://ico.org.uk/make-a-complaint/> or call their helpline on 0303 123 1113.

9. How long do you keep my personal data for?

We keep the personal data we collect from you (and where applicable, other third parties) where we have an ongoing legitimate business need to do so. For example, to comply with applicable legal, tax or accounting requirements.

We will keep most of your personal data for as long as you are using our services, and generally for a minimum of seven years after that to comply with the legal or regulatory requirements, or if we face a legal challenge.

To work out how long we keep different categories of personal data, we consider why we hold it, if it is special category data, how long the law says we need to keep it for, and what the risks are.

10. How Do I Contact You?

To contact us about anything to do with your personal data and to exercise any of your rights, please use the following details (for the attention of Mandhir Singh):

- Email address: mandhir753@gmail.com.
- Telephone number: 07857 879 558.
- Postal Address: 16 Old Lindens Close, Streetly, Birmingham, B74 2EJ.

11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects how your personal data is protected.

Any changes will be immediately posted on Our Site and we recommend that you check this page regularly to keep up-to-date. This Privacy Notice was last updated on 4 November 2020.

If we need to make substantial changes to this Notice, we will notify you, if we hold your contact details, before we make any changes unless we are required to make the change sooner (for example regulatory reasons).