

# Privacy Notice – TPG Employee, Contractor and Dependent

## What does this Privacy Notice cover?

Every individual within the Shell group of companies “Shell” is responsible for protecting personal data about each other as well as that of our customers, business partners and suppliers.

This Privacy Notice provides information about personal data processed by Texas Petroleum Group, d/b/a/ Timewise Food Stores (“TPG” or “We”) which is part of Shell in relation to individuals who are or were employees, interns, individual contractors or are dependents of employees (hereinafter “TPG employees” or “TPG staff”).

For TPG staff who are also customers or users of a TPG app or website in any capacity other than as staff, please refer to the relevant external privacy notice on our website.

This Privacy Notice explains **what** personal data is processed, for **which purposes**, **how long** we hold the personal data for, how to **access** and **update** your personal data and where to go for further **information** or to **lodge a complaint**.

Beside this Privacy Notice we have further data protection regulations within TPG which describe and govern how we process personal data relating to certain HR processes. Furthermore, it is possible that in certain countries in which we are active local data protection regulations are applicable which reflect the local practices and legal regulations. Insofar as these are applicable We will inform you separately about these regulations and send you copies of it or a link with which you have access to these regulations.

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

## What personal data do we process?

We process personal data necessary to manage the employment relationship, to engage contractors and interns and to provide benefits to certain dependents of TPG employees.

This includes 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 and any other information necessary for managing the employment relationship, for engaging contractors and for providing benefits to certain dependents of TPG employees.

## Sensitive personal data

In limited circumstances we may also process some special categories of personal data (‘sensitive personal data’) such as data relating to an individual’s health, their racial or ethnic origin, religious or philosophical beliefs, sexual orientation, and trade union membership.

We will only process such 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 the establishment, exercise or defense of claims;
- where necessary for the purposes of providing occupational medical advice and support, to protect the vital interests of an individual (such as in an emergency), where necessary for reasons of public health;
- or where the individual has provided their explicit consent (only if required by local law).

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

We may process your personal data in the following cases:

- to the extent it is necessary to establish and conduct the employment relationship, e.g. for the purpose of payroll;
- in order to satisfy our obligations to comply with local laws and regulations;
- for legitimate business interests (for example performance management in order to ensure we have qualified and competent personnel or for health, safety and security purposes to ensure that only authorised personnel can access certain sites or assets), litigation and defense of claims); or
- where we have your explicit consent.

Please note that as a general principle, TPG does not seek or rely on the consent of TPG staff for processing personal information. However, there are limited circumstances when consent is required.

Personal data requested from TPG staff is the minimum required in order to fulfil legal and/or contractual requirements and to provide opportunities to take part in programs or to provide a benefit. Failure to provide us with the information requested may negatively affect your ability to remain in employment, internship, or engagement as a contractor or from participating in a program or receiving a benefit.

In those cases, where processing is based on consent, and subject to applicable local law which provides otherwise, 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. Withdrawal of consent may however impact your ability to remain employed or otherwise engaged or from participating in a program or receiving a benefit.

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

We process personal information covered by this Privacy Notice for the following purposes:

- **Human Resources, personnel management, business process execution, internal management, management reporting, organisational analysis and development** - including budgetary, financial and organisational planning, administration, compensation, performance management;
- **Health, safety and security** - including protection of TPG Staff's life or health, occupational health and safety, protection of TPG assets and authentication of TPG Staff status and access rights; or
- **Legal and/or regulatory compliance** - including compliance with legal or regulatory requirements.

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

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

### **Monitoring**

All activities on TPG IT equipment and/or when connected to the TPG IT network may be monitored for legitimate business purposes.

All TPG Staff receive an access badge or other means of entry which allows TPG to record the date, time and access points made by individuals within TPG premises and assets. The data from the access and security systems are used:

- for health, safety and security purposes, to prevent fraud and specifically the protection of TPG assets, TPG Staff and visitors to TPG premises;
- to comply with legal and regulatory requirements, specifically where there is a local legal requirement to provide information to government/regulatory authorities;
- to monitor (on an aggregated basis) the number of individuals entering and working in a TPG premise for human resources and real estate planning; and
- in the case of contractors only (not TPG employees) the date and time of their entry and exit of TPG premises may be used for the purposes of financial management and control.

Most of our premises and assets are equipped with surveillance cameras (CCTV). Where surveillance cameras are used they will be identified. Surveillance cameras are used for health, safety and security specifically the protection of TPG assets, TPG staff and visitors to TPG premises. All images are routinely deleted unless there has been a health, safety or security incident, suspected or actual criminal activity, in which case they may be viewed by internal TPG investigation teams and externally if legally required or permitted by law enforcement or other government authority.

## **Screening**

In order to comply with legal and regulatory obligations, to protect TPG's assets and employees/contractors and specifically to ensure that TPG can comply with trade control, anti-money laundering and/or bribery and corruption laws and other regulatory requirements, we carry out screening on all employees and contractors 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 TPG (for example from the Conflict of Interest register - see [here](#) for more information).

Any personal information collected through the screening will not involve profiling or automated decision making regarding suitability for continued employment, internship or engagement as a contractor.

## **Who is responsible for any personal data collected?**

Controller of the data in the sense of the applicable laws is TPG at 11111 Wilcrest Green Dr, Suite 150, Houston, Texas 77042.

In the case of individual contractors, controller is the company within the Shell Group that has contracted your services solely or jointly with its affiliates within the Shell group of companies and your external contracting/employing company/agency.

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

Your personal data is exclusively processed for the purposes referred to above. It will be exclusively processed by your employer 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 the United States of America;
- Authorized third parties to the extent it is necessary to conduct the employment relationship (e.g. external payroll accounting); and
- A competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which TPG or the relevant TPG company/companies is subject to or as permitted by applicable local law.
- Personal information may also be shared in connection with the sale, assignment, merger or other transfer of all or a portion of the applicable TPG business to another business entity.

## **Transfers of personal data**

Where your personal information has been transferred to companies within the Shell group and/or to authorized third parties located outside of your country 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 data**

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 the personal data for?**

All information, including personal data is managed in line with the TPG standards for Information and Records Management and securely deleted once no longer required for a legitimate business purpose or for a legal/regulatory purpose.

With some exceptions required to comply with local legal requirements:

- Information contained within personnel files is held for no longer than 10 years once your employment has terminated;
- information relating to retirement benefits are held for no longer than 99 years from the commencement of employment;
- any personal information gathered as part of the screening against publicly available or government issued sanctions lists and media sources are held for no longer than 15 years after they were first gathered;
- the names, date, time and access points for all individuals entering TPG premises are held for 3 years from each access;
- where an individual has been dismissed or had their contract terminated due to serious misconduct, including breaching the Shell Life Saving Rules or breaching the Shell Code of Conduct that information is held for up to 30 years post termination.

In all cases information may be held for a) 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) or b) a shorter period where the legitimate purpose of storing the personal data has repealed.

### **How can I access my personal data?**

We aim to keep our information about you as accurate as possible. You have a right of access and a right of information with regard to your personal data.

You can access your personal data, request correction or deletion of the personal data (but only where the purpose of storing has repealed) and request that the processing and the transfer of your data is restricted to the extent necessary to conduct the underlying contracts. Individuals with access to HR Online may access their personal data via <https://myadp.com>.

**Who can I contact for more information?**

Please address your questions and claims in context of this privacy notice to TPG at HR@texaspetroleumgroup.com. You may also contact your local HR adviser for further questions. If you are a contractor, you can get into contact with the controller and should as well contact your external contracting/employing company/agency.

You can also contact Privacy-Office-SI@shell.com or Shell Group Chief Privacy Officer at 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 Hoge Nieuwstraat 8, 2514 EL The Hague, Netherlands. Please visit <https://autoriteitpersoonsgegevens.nl/en> for more information.

We may share selected personal data about our employees, if necessary, to respond to an apparent medical or other life-threatening emergency.

**Changes to this Privacy Notice**

This Privacy Notice may be changed over time. The Privacy Notice is applicable in the respectively actual version in accordance with the applicable statutory law. This Privacy Notice was last updated in April 2024.