

# Shareholder privacy notice

## What is the purpose of this notice?

Harbour Energy is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about current and former shareholders of Harbour Energy plc, in accordance with the General Data Protection Regulation (GDPR).

## Who does this notice apply to?

All current and former shareholders of Harbour Energy plc, whether that interest is or was legal or beneficial.

The controller of your personal data that is collected and processed for the purposes explained in this privacy notice is Harbour Energy plc. The data controller's representative for the purposes of this privacy notice is Harbour Energy plc's Company Secretary, who can be contacted using the contact details set out at the end of this notice.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. Relevant to the purposes we have told you about and limited only to those purposes;
4. Accurate and kept up to date;
5. Kept only as long as necessary for the purposes we have told you about; and
6. Kept securely.

## What kind of information will we hold about you?

We collect certain personal data about you, including:

- your name;
- your address;
- details of your past or present holdings of shares and/or interests in shares in Harbour Energy plc, whether you hold or held these as legal owner or have or had a beneficial interest in them;
- details of how you have in the past exercised, or intend in the future to exercise, your voting rights attached to shares in Harbour Energy plc;

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- your bank or building society account details into which dividends and other income or capital returns on your shares have in the past, or should in the future, be paid;
- your contact details, such as email addresses and telephone numbers, where you have provided these to us; and
- your voice, where this is captured by audio recording equipment at a shareholder event.

### How is your personal information collected?

We collect personal information in a variety of ways, including:

- by you providing it to us, either voluntarily or at our request or demand;
- if you are also an employee of a Harbour Energy group company;
- by third parties acting on your behalf providing certain of these details to us, such as stock brokers and other agents through whom you may have acquired or disposed of your shares or interest in shares;
- where you exercise your rights in respect of your shares, including by your attendance at general meetings and voting in person or by your casting proxy votes, whether in hard copy form or by submitting electronic instructions via the CREST system;
- from third parties who perform services on our behalf, such as our registrars who assist us with maintenance of our share registers and with the conduct of our general meetings;
- by capturing your voice on audio recording equipment, for example on any recordings made of our general meetings if you attend such meetings, and on any recordings made of other presentations to shareholders if you attend such presentations.

### How will we use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a legal obligation (such as maintaining and administering the Company's register of members or maintaining and administering a register of beneficial ownership)
- Where we need to comply with a contractual obligation (such as communicating with you in accordance with the provisions set out in the Articles of Association of Harbour Energy plc).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests (such as preventing, investigating or detecting theft, fraud or other criminal activity). When relying on our legitimate interests, we will ensure that your fundamental rights are not overridden by these interests.

Where we use your personal data because we have a legal obligation to do so or to perform a contract with you, there is no right to object.

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### **Do we need your consent?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process certain data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

### **What are our obligations to collect and your obligations to provide personal data?**

We have legal obligations to collect and process certain personal data about you, for example to record your details in our statutory register of members, to pay you amounts due on your shares, to enable you to exercise your rights attached to shares and to send you certain information. You may also have legal obligations to provide us with certain information about you, for example where we make a statutory demand to ascertain the beneficial ownership of shares.

If you fail to provide certain information when requested to enable us to comply with our legal obligations, you may not be recognised as a shareholder of Harbour Energy plc and/or you may not be entitled to exercise or enjoy your rights attaching to your shares in Harbour Energy plc and/or we may not be able to fulfil our other obligations to you.

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

Your information will be shared with third parties where we are legally obliged to do so, for example with government bodies and regulatory agencies and with the courts and parties to legal proceedings pursuant to court rules and orders.

We may share your personal data with subsidiaries of Harbour Energy plc, for example where they assist us in complying with our legal obligations to you and/or managing our relationship with you.

We may also share your personal data with third party suppliers and service providers to Harbour Energy plc and its subsidiaries, for example professional advisors and third parties who are used by us to perform processing activities, such as our registrars.

### **For how long will we process your personal data?**

We will process your personal data for as long as you hold shares in Harbour Energy plc and will continue to retain your data after you cease to be a shareholder in the Company for as long as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise in connection with your shareholding.

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### What rights do you have in relation to your personal data?

Under certain circumstances, by law you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request deletion of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

Please contact the Company's registrar, Equiniti, if you wish to exercise any of these rights.

### What should you do if you have any questions or complaints?

If you have any questions or complaints about how we process your personal data, you should contact Harbour Energy plc's Company Secretary at:

- Address: Company Secretary, Harbour Energy plc, 23 Lower Belgrave Street, London, SW1W 0NR  
or
- Email address: [investor.relations@harbourenergy.com](mailto:investor.relations@harbourenergy.com)

You have the right to make a complaint at any time to us through Company Secretary (see details above) or the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Contact details can be found here: <https://ico.org.uk/>.