

PRIVACY NOTICE

Updated: 15 November 2018

1. THE PURPOSE OF THIS NOTICE

This privacy notice describes how Kuwait Energy plc (the **Company**) uses, stores, transfers or otherwise processes personal data. This may relate to you if you are an individual or to your individual representatives if you are a body corporate. This notice also contains information about rights in relation to personal data.

We have appointed our Chief Legal Officer & Company Secretary to oversee compliance with this privacy notice. Any questions about the contents of this privacy notice or how personal data will be used, stored, or transferred, should be sent to Thomas.Hickey@kec.com.kw or by post to Queensway House, Hilgrove Street, St Helier, Jersey JE1 1ES.

2. RESPONSIBILITY FOR PERSONAL DATA

This privacy notice is provided on behalf of the Company. Where we use the terms **we**, **us** and **our** in this privacy notice, we are referring to the Company.

When personal data is provided to us, we will, in relation to some or all of the personal data, be acting as "data controller". The data controller determines how the personal data is used and for what purposes.

3. THE DATA WE COLLECT

The types of personal data we collect and share depends on the type of investor and investment being made. The types of information which we may collect include:

- (a) Name, address and other contact information.
- (b) Date of birth, place of birth, passport details or other national identifier, national insurance or social security number and information about your family.
- (c) Information regarding bank account details, assets, income, employment, source of funds, investment history and risk tolerance.

In order to provide our services to you we may collect information about you directly and from Computershare.

4. HOW WE USE PERSONAL DATA

We require personal information for a number of reasons, including:

- (a) For our legitimate interests or for those of a third party to enable us to:
 - Administer and manage investments, including corresponding with you in connection with your investment.
 - Provide you with and inform you about the Company and its affiliated entities.
 - Review, analyse and process any requests or applications made by you or on your behalf.
 - Address or investigate any complaints, claims, proceedings or disputes and to seek professional advice, including legal advice.
 - Meeting our obligations and requirements including regulatory, accounting, tax reporting and audit.

- Ensure appropriate management and governance, management of risk and operations (including protecting our business against fraud and other risks) and to maintain our internal records and act in accordance with our policies and procedures.
- (b) For compliance with applicable legal or regulatory obligations to:
- Undertake our due diligence checks.
 - Comply with requests from regulatory, governmental, tax and law enforcement authorities.
 - Undertake investigation, surveillance and audit checks and to prevent and detect fraud.
 - Maintain statutory registers.

5. CONSEQUENCES OF NOT PROVIDING PERSONAL DATA

We require certain personal information to be able to comply with our legal and regulatory obligations and to operate our business. Accordingly, if personal data required is not provided, we may not be able to deliver our services.

6. DISCLOSURE TO THIRD PARTIES

We may transfer personal data to external entities connected to the Company, including:

- (a) Investment managers and advisers and our affiliated entities in order that we can manage our relationship with you.
- (b) Administrators and depositories in connection with the management of your investment, the administration of investment related activities and to enable compliance with applicable laws and regulations.
- (c) Tax authorities to comply with applicable laws and regulations or where requested by such tax authority (including authorities outside of the European Economic Area (**EEA**)).
- (d) Service providers and our professional advisers to facilitate your investment, provide investment related services and to provide us with legal advice in relation to the Company.

There may also be circumstances where the Company is obliged by law to disclose personal data, including to law enforcement agencies and applicable regulators.

7. LOCATION OF PERSONAL DATA

It may be necessary for the Company or our associated third parties to effect cross-border transfers of personal data, including to countries outside of the EEA. In some cases, personal data may be transferred to jurisdictions outside of Jersey and the EEA that are not deemed to have data protection frameworks that are equivalent to those of the EEA. Such transfers may be to other Company entities, to governmental, regulatory or judicial authorities, auditors, legal advisors or agents as well as to sub-contractors engaged by the Company. In these situations we will seek to put appropriate safeguards in place to maintain the security of your data. Please contact us if you would like to know more about these arrangements.

8. RETENTION OF YOUR DATA

The Company and those third parties to whom personal data is transferred will retain that data as long as is necessary for the purposes set out above, including where necessary for the Company's legitimate interests, to comply with legal or regulatory obligations or to facilitate the Company's on-going administration and performance.

9. INDIVIDUAL RIGHTS

Individuals whose personal data is processed by us have certain legal rights in respect of the information. These include:

- The right to request access to personal data.
- The right to obtain information about the use of personal data.
- The right to require rectification (correction) of errors in personal data without undue delay.
- The right to have personal data erased without undue delay in certain circumstances.
- The right to restrict the processing of personal data in certain situations.
- The right to receive personal data in a structured, commonly used and machine-readable format and transmit that data to a third party.

If an individual wishes to exercise any of these rights and the Company has transferred that person's data to a third party, the Company will communicate that request to the relevant third party unless it would be impossible or involve disproportionate effort for the Company to do so.

10. UPDATES

This notice is under regular review and may be updated periodically and without prior notice to reflect changes in the Company's data privacy practices.

11. CONCERNS OR QUERIES

Any questions about the contents of this notice or the Company's use of personal data should be addressed to Thomas.Hickey@kec.com.kw or by post to Queensway House, Hilgrove Street, St Helier, Jersey JE1 1ES.

Issues or concerns individuals have regarding their personal data can also be brought to the attention of the applicable supervisory authority in your country, where you live or work, or the location where the data protection issue arose.