



# Web Privacy Notice Geoex MCG

## Who we are

We are the Geoex MCG Group (referred to in this document as We, Us, Our and Geoex). We are the Data Controller for your information under the Data Protection Legislation.

The Geoex MCG Group consists of

### *Geoex MCG Ltd*

- Registered address: Global House, 1 Ashley Avenue, Epsom, Surrey KT18 5AD, United Kingdom
- Registered Number: 4835527 / Registered in England & Wales

### *Geoex MCG LLC*

- Registered address: 5251 Westheimer Road, Ste 600, Houston, Texas 77056, USA
- Registered number: 801767558

### *MultiClient Geophysical, Filial Av Geoex MCG Ltd*

- Registered address: Skysstasjon 5 (Entrance D), 1383 Asker, Norway
- Org. no: 924671645

## Introduction

We understand the importance of your personal data and have developed this privacy notice to ensure that you are fully aware of:

- the personal information we collect about you,
- what we do with your information,
- how we keep your information secure, and
- the rights and choices you have over your personal information.

We will use your information as set out in this privacy notice. If we need to use your personal information for any other purpose, we will take steps to provide you with additional information and we will update this notice.

## The personal information we collect

We only collect personal information that we genuinely need to provide our services to you.



We collect information about you from multiple sources depending on the services that you are engaging with – some information is collected directly from you, some is generated when you interact with our services and, in some cases, we gather information about you from third parties.

The volume of information we collect will also change depending on how you have interacted with us.

### ***As a customer;***

If you are a customer you, or the company that you work for, will provide us with your:

- name,
- telephone number,
- email address, and
- company address.

Associated with your account we will also maintain records of your:

- purchase history
- technical information such as your IP address, log-in information and your devices.

### ***As a prospect***

If you are a prospect we will collect and hold your:

- name,
- telephone number,
- email address,
- company address,
- position in company including department or job title, and
- details of any interactions with our sales teams.

We may collect this information from you directly (for example, by email or at an event), via publicly available information, from industry and business partners, and event organisers in line with their privacy information.

### ***As a Supplier***

If you are a supplier to us, we will collect and process your:

- name,
- telephone number,
- email address,



- company address,
- details of services provided, and
- payment details.

### ***As a Website Visitor***

If you visit [www.geoexmcg.com](http://www.geoexmcg.com) we collect standard website traffic information and details of visitor behaviour patterns.

If you enter details into any of our contact forms (including writing to us via email) you are considered a prospect and the information collected is above.

We collect limited technical information about your visit to our site to help us to better understand how visitors to our website move around, and interact with, our services.

Geoex does not collect or process any Special Category or particularly sensitive information about you unless you share it with us directly.

### **Lawful basis for processing your personal information**

We will only ever process your personal information if we have a lawful basis to do so. The lawful bases we rely on are:

- **Contract** – This is where we process your information to fulfil a contractual arrangement we have made with you, such as for the provision of our services to you/your company.
- **Consent** – This is where we have asked you to provide permission to process your information for a particular purpose, such as to send you marketing material. Please note, if we are relying on your consent, you can withdraw it at any time by contacting us or using the opt-out link in any emails that we send to you.
- **Legitimate Interests** - This is where we rely on our interests as a reason for processing, generally this is to provide you with our service in the most secure and appropriate way.
- **Legal Obligation** – This is where we have a statutory or other legal obligation to process the information, such as for the investigation of crime.
- **Vital Interest** – This is where we need to process personal information in an emergency to protect an individual's safety.

### **Your Rights**

Depending on where you are based you may have specific rights under your local data protection legislation. If you would like to exercise any of these rights you can contact us using the contact details in the "Contact Us" Section.

Your rights may include:



### *The right to be informed about our collection and use of your personal information*

You have the right to be informed about the collection and use of your personal information. This Privacy notice gives you this information.

### *Right to access your personal information*

You have the right to access the personal information that we hold about you. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 1 month from the point that we are able to confirm your identity. We will ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information.

### *Right to correction of your personal information*

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you can ask us to correct it. Please contact our customer services team at Geoex if you need to make any updates to your personal information or circumstances.

### *Right to restrict processing*

You have the right to ask us to restrict the processing of your personal information. For example, this may be because you have issues with the accuracy of the data we hold or the way we have processed your information. The right is not absolute and only applies in certain circumstances.

### *Right to erasure*

You have the right to have personal information erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

### *Right to portability*

The right to portability gives you the right to receive personal information you have provided to us in a structured, commonly used and machine-readable format. It also gives you the right to request that we transmit the information directly to another controller.



### *Right to object*

You have the right to object to our processing of some or all of the personal information that we hold about you. This is an absolute right when we use your information for direct marketing but may not apply in other circumstances where we have a compelling reason to do so, for example if we have a legal obligation.

You can change your marketing preferences at any time by contacting us.

### *For more information about your privacy rights*

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make lots of information accessible to consumers on their website and they ensure that the registered details of all data controllers, such as ourselves, are available publicly. You can access the ICO's consumer information at <https://ico.org.uk/for-the-public>.

### *Your right to make a complaint*

You can make a complaint to the relevant regulatory body at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first.

Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

## **How we use your personal information**

Depending on whether you are a Customer, Prospect or Supplier we will use your personal information for a number of purposes - namely to ensure we are providing our services to you in the ways that you would expect. This section details the core reasons that we will use your information.

### *To answer any questions that you have or to follow up on enquiries*

- If you contact us through email, social media, phone or through our website we will use your information to answer your questions and to correspond with you.
- We will record phone calls and maintain copies of your interactions with us and will use this on an ongoing basis for quality monitoring and to help us improve our services.



#### *To provide our services and manage our relationship with you*

- As a Prospect or Customer, we will use any information you provide to us to manage and monitor our business relationship with you including fulfilling your requests, monitoring your subscriptions and interact with you about any enquiries you may have.
- As a Supplier will use your information to manage our relationship with you and monitor the services that you are providing to us. Managing our relationship will include carrying out due diligence on your organisation and employees including (where necessary) antibribery and corruption checks which may include the collection of information about directors, officers and contact persons such as name, nationality, residence, existing position, former positions and information on ownership.

#### *To manage and improve our business and our interactions with you*

We will use certain personal and technical information including information from Cookies to:

- analyse and understand our consumer base,
- understand the effectiveness of our advertising campaigns,
- develop new products and services,
- secure our network,
- investigate and respond to service or security issues,
- ensure our website operates on multiple platforms,
- troubleshoot, test, support and maintain our website, App and other business services, and
- for logistical and demand forecasting.

#### *To meet our legal and regulatory obligations*

- We use your information to ensure we comply with any requirements imposed on us by law or court order, including disclosure to law or tax enforcement agencies and authorities or pursuant to legal proceedings.
- We will share data with regulatory and other official bodies if they make formal requests.
- We will maintain records to meet regulatory and tax requirements.
- If you provide gifts or entertainment, we will maintain information in order to comply with anti-corruption legislation.

#### *To Prevent and Detect Crime*

- When you contact us, we use your account information to assist in confirming your identity.
- We use device identifiers and IP addresses in fraud prevention and investigations, and to maintain network and data security.



*To keep in touch with you and promote our products and services*

- We will use your information to send you promotional material that we believe will be relevant to you.
- We will use your information to make suggestions and recommendations on our website and on the web about goods and services that may be of interest to you.

*Note - You can unsubscribe from marketing communications at any time.*

- We will also use your contact information to send you service messages, such as changes to this policy, updates to our terms and conditions, or information about your services with us – these communications are not marketing messages.
- We may also contact you to take part in satisfaction surveys. Responses will be used to help develop and improve our products and services.

### **How long we retain your personal information**

We retain a record of your personal information in order to provide you with a high quality and consistent service and to evidence the actions we have taken on your behalf.

We only keep your personal information for the length of time we need it to i.e.:

- deliver our services to you,
- meet our business needs, and
- meet our legal obligations.

If you have specific questions on the retention of your information, please contact us.

Who we may share your personal information with

In some circumstances we may need to share your personal information with third parties to:

- provide you with the service that you have asked for,
- meet our legal obligations, and
- run and manage our business.

### **We may share your personal information with:**

- Law Enforcement or other public authorities that require us to release information,
- to any organisation where it is necessary for us to establish a legal claim or to defend ourselves against such a claim,
- other members of our group of companies as required for them to provide you with our group products or services including delivery of your requested services,
- our professional advisors including accountants, legal professionals or insurers,



- payment services providers who process payments on our behalf,
- providers of ancillary business support services such as Information Technology services (as a processor on our behalf),
- marketing service providers (as processors on our behalf) including organisations that help us communicate with you,
- online advertising providers that help us in showing advertising material to you on our site, on the internet and on social media (if you are opted-in to marketing), and
- any organisation in the event of the sale, merger, reorganisation, dissolution or disposal of our business. We will inform you of any such transfer or disclosure as required by law.

In all cases we:

- only provide the minimum personal information that each party requires to carry out their duties, and
- only disclose personal information to organisations who we have a contractual relationship with or have an overriding legal requirement to access the information.

### **International transfers of personal information**

In some instances your personal information may be processed outside the UK and the European Economic Area (EEA). For example, we work with suppliers and partners who may make use of cloud and /or hosted technologies across multiple geographies and jurisdictions.

If and when this is the case, we take steps to ensure there is an appropriate level of security so your personal information is protected in the same way as if it was being used within the UK or the EEA.

Where we need to transfer your personal information outside the UK or EEA, we will use one of the following safeguards.

- Standard contractual clauses in contracts for the transfer of personal information to third countries or
- Transfer your information to a non-EEA country with privacy laws that give the same protection as the EEA.

How we protect your personal information

Data security is of great importance to us and to protect your information we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any information that we control.

At a high level we have put the below measures in place:

- limiting access to our buildings to those that we have determined are entitled to be there,
- implementing access controls to our information technology estate,
- limiting the availability of personal information to those that require access to that information, and





- all our employees and agents who have access to or are involved in the processing of personal information are contractually obliged to protect the confidentiality of it.

Our websites may include links to external websites operated by other organisations. They may collect personal information from visitors to their site. We cannot guarantee the content or privacy practices of any external websites and do not accept responsibility for those websites.

### **How we use Cookies**

When you first visit our site, you will be asked for your permission for us to use cookies.

Cookies help us provide you with a better experience, by enabling us to monitor which pages visitors find useful and those which they do not. A Cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

These Cookies do not directly store your personal information but can uniquely identify your browser and device.

If you do not allow these Cookies, you will see less targeted adverts from us. You may, however, see generic advertisements from or about us on Social Media or around the web.

### **Changes to this notice**

We may change this Privacy notice from time to time (for example, if the law changes). If the changes are material, we will take steps to inform you via email or through our services.

### **How to contact us**

If you would like to:

- exercise one of your rights as set out above,
- have a question or a complaint about this notice, or
- have a question or complaint about the way your personal information is processed.

You can contact us using the details below:

- 1) By emailing us at – [info@geoexmcg.com](mailto:info@geoexmcg.com)
- 2) By writing to us at – Geoex MCG, Global House, 1 Ashley Avenue, Epsom, KT18 5AD, United Kingdom