



FracMan Software Privacy Policy

DATE October 2022

TO

CC

FROM Dr Mark Cottrell

EMAIL: mark.cottrell@wsp.com

FRACMAN SOFTWARE: PRIVACY POLICY, WSP UK LIMITED

General Information

WSP UK Limited (“WSP”), our parent company and affiliates (collectively, “we” or “the “Company”), are committed to protecting the privacy of our business partners (“you” or “Client”) who are licensed to use our FracMan DFN software (“the “Software”), and our Client’s end users which have access to any of the data resources associated with our Software (“End Users”).

We encourage you and your End Users to read this “Software Privacy Policy” (“Privacy Policy”) carefully and use it to make informed decisions. By using the Software, you agree to the terms of this Privacy Policy, and your continued use of the Software constitutes your ongoing agreement to it.

Client’s Obligation

Client shall ensure that all End Users have been informed of, and have given their consent to, Company’s use and process of any information, as detailed in this Privacy Policy, to the extent such consent is required by applicable law.

What Information Do We Collect?

We collect two types of information when you or your End Users are using our Software:

- The first type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“Personal Information”), which includes the following:
 - Contact information (including name, address, telephone number, and email address); and
 - IP-Address of the computer on which the FracMan licence is activated.
- This information is generally collected only at the time at which the license is first activated on the relevant End User’s computer;
- Client Information: We may collect contact information (including Personal Information) from you when you register on our website site, subscribe to our newsletter, register for an event, respond to a survey, or fill out a form;
- The second type of information is unidentified and non-identifiable information pertaining to you or to your End Users, which may be made available or gathered via your use of the Software (“Non-Personal

Information”). We are not aware of the identity of the user from which the Non-Personal Information was collected; and

- Non-Personal Information and technical information which is being collected and transmitted by your device or your End Users’ devices, including certain software and hardware information such as the date on which the FracMan licence is activated.

Please note that when the Software is deployed by our Clients, it is distributed via a FracMan installer download link, with the licence details being provided separately via email. Upon installation a licence activation process is initiated, in which the user’s computer connects to the WSP FracMan licence server and the licence details provided are verified against WSP’s records and access is either granted or refused. The licence activation process is only required at the time of software installation & activation.

How Do We Use the Information We Collect?

We use the Personal Information for legitimate business purposes only, such as:

- To set up your account and to provide our services to you and to your End Users;
- To authenticate End Users’ access to the Software;
- To improve our Software;
- To support and troubleshoot our Software and to respond to queries; and
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, to comply with a subpoena or similar legal process, or respond to a governmental request.

We use the Personal Information only to the extent required and while maintaining your right to privacy.

With Whom Do We Share the Information We Collect?

We do not rent, sell or share your Personal Information with third parties except as described in this Privacy Policy.

Other than for the purposes set forth below, Client’s and End User’s Personal Information will not be transferred or disclosed outside of Company to other trusted third-party service providers or partners:

- Storing Personal Information on our behalf (e.g., cloud computing service providers);
- Assisting us with our business operations and Software and improving it; and
- Performing research, technical diagnostics and analytics about the Software.

We may disclose Personal Information, or any information you submitted via the Software if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:

- Comply with any applicable law, regulation, legal process or governmental request;
- Enforce our policies (including this Privacy Policy), including investigations of potential violations thereof;
- Investigate, detect, prevent or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- To establish or exercise our rights to defend against legal claims;
- Prevent harm to the rights, property or safety of us, our users, yourself or any third party; or

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- For the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

Since we operate globally, it may be necessary to transfer Personal Information to countries outside the UK and European Union. The data protection and other laws of these countries may not be as comprehensive as those in the UK and European Union – in these instances, we take additional steps to ensure that a similar level of protection is given to Personal Information. You hereby consent to the transfer of your and your End Users' Personal Information to countries outside of the UK and European Union.

Third Party Collection of Information

Our policy only addresses the use and disclosure of information we collect from you and from your End Users through the Software.

How Long Do We Retain the Information We Collect?

At any time, you or your End Users may request to change, update, correct errors or delete Personal Information by emailing us at infosec@wsp.com.

Please note that unless you instruct us otherwise, we retain the information we collect for as long as needed to provide our services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

How Do We Safeguard and Transfer Your Information?

We are committed to making reasonable efforts, in accordance with market best practices, to ensure the security, confidentiality and integrity of the Personal Information. We take great care in implementing and maintaining the security of the Software and the Personal Information. Access to the Personal Information is based on data access minimization and role-based access control, ensuring only authorized access to the Personal Information. We employ market best practice security measures to ensure the safety of your End Users' Personal Information and prevent unauthorized use of any such information. Although we take steps to safeguard such information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Software, and we make no warranty, express, implied or otherwise, that we will prevent such access. If a password is used to help protect your accounts and Personal Information, it is your responsibility to keep your password confidential.

What Are Your Rights?

You may contact us at infosec@wsp.com any time and request:

- To access, delete, change or update any personal data relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected); or
- That we will cease any further use of your Personal Information or delete your information (for example, you may ask that we stop using or sharing your Personal Information with third parties).

If you wish to raise a complaint on how we have handled your Personal Information, you may contact us at the addresses indicated below.

Minors

The Software is not designated to End Users under the age of 18. If we become aware that End Users under the age of 18 have shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at infosec@wsp.com.

Updates or Amendments To The Privacy Policy

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on the FracMan webpage (<https://www.golder.com/fracman/>). We encourage you to review this Privacy Policy regularly for any changes. In the event of material changes, we will notify you through our Software or by email.

Your continued use of the Software, following the notification of such amendments, constitutes your acknowledgement of and consent to such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

How to Contact Us

If there are any questions regarding this Privacy Policy or the information that we collect about you, or if you feel that your privacy was not treated in accordance with this Privacy Policy, you may contact us at infosec@wsp.com.

Additional contacts:

Chief Information Security Officer
WSP UK Limited
70 Chancery Lane
London
WC2A 1AF, United Kingdom

If you are unsatisfied with our response, you can reach out to the applicable data protection authority for the Company affiliates for the purpose of the UK and EU General Data Protection Regulations (for the UK, the Information Commissioner's Office ("ICO") – see <https://ico.org.uk/make-a-complaint/>).