



PERSONAL DATA PROTECTION POLICY

Corporate Policy Manual

Entity: EMES Ventures Inc.
Applicable to Oil & Gas Operations
Issued by: Board of Directors
Effective Date: March 3rd, 2024
Version: 2.1



1. Purpose

EMES Ventures Inc. recognizes the importance of protecting the privacy and personal data of individuals with whom it interacts in the course of its operations. This includes employees, contractors, clients, suppliers, partners, applicants, and other stakeholders. The purpose of this Policy is to establish the principles and procedures governing the collection, use, storage, transfer, and protection of personal data processed by the organization.

2. Scope

This Policy applies to all personal data handled by EMES Ventures Inc. in both physical and digital formats. Personal data refers to any information that identifies or can reasonably be used to identify an individual. This may include names, contact details, identification numbers, employment history, financial information, and any other information associated with an identifiable person. Sensitive personal data may include information relating to health, financial status, political exposure, or biometric characteristics.

3. Principles of Processing

EMES Ventures Inc. shall process personal data in accordance with recognized principles of responsible data management. Personal data will be obtained and used only for legitimate purposes related to the organization's operations and obligations. Where required, personal data shall be collected with the knowledge and consent of the individual concerned. The organization shall ensure that personal data is used solely for the purposes for which it was collected and shall limit its collection to what is strictly necessary. Reasonable steps shall be taken to maintain data accuracy and to ensure that personal data is not retained longer than required. All personal data shall be handled confidentially and protected against unauthorized access, misuse, or disclosure.

4. Lawful Use of Personal Data

Personal data may be processed for purposes including employment administration, management of contractual relationships, compliance with legal or regulatory obligations, due diligence processes, security and risk management, and general business operations. In all cases, the use of personal data shall be proportionate and relevant to the intended purpose.

5. Rights of Data Subjects

Individuals whose personal data is processed by EMES Ventures Inc. have the right to access their data and request corrections where necessary. They may also request the deletion of personal data when appropriate or object to certain uses of their information where legally permissible. Requests relating to personal data may be submitted to the Compliance function of the organization for review and appropriate action.

6. Data Security

The organization shall implement reasonable administrative, technical, and organizational safeguards to protect personal data. These measures may include restricted access to



information, secure storage practices, confidentiality obligations, and technological protections such as password controls or encryption where appropriate. Personnel are expected to respect the confidentiality of personal data and shall not disclose such information without proper authorization.

7. Third-Party Transfers

Personal data may be shared with third parties only when necessary for legitimate business purposes, contractual obligations, or compliance with legal requirements. In such cases, EMES Ventures Inc. shall ensure that third parties receiving personal data are obligated to maintain confidentiality and to use the data solely for the purposes for which it was shared.

8. Sensitive Data

Sensitive personal data shall receive enhanced protection and shall only be processed where necessary to meet legal obligations, employment requirements, or risk management responsibilities.

9. Retention and Disposal

Personal data shall be retained only for as long as necessary to fulfill operational, contractual, or legal purposes. Once such purposes have been fulfilled, the organization shall take reasonable steps to ensure that personal data is securely disposed of.

10. Breach Notification

Any suspected unauthorized access to, misuse of, or breach involving personal data must be reported immediately to the Compliance function. The organization shall review such incidents and take appropriate corrective action as needed.

11. Responsibilities

All personnel of EMES Ventures Inc. share responsibility for safeguarding personal data and complying with this Policy. Failure to adhere to the provisions of this Policy may result in disciplinary measures consistent with the organization's internal governance framework.

12. Compliance with Applicable Laws

EMES Ventures Inc. shall comply with applicable data protection laws and regulations relevant to the jurisdictions in which it operates and to the governmental or institutional entities with which it maintains commercial relationships.



ANNEX 1 – PRIVACY NOTICE

1. Identity of the Responsible Entity

EMES Ventures Inc. is responsible for the processing and protection of personal data collected in the course of its operations.

2. Purpose of Data Processing

Personal data shall be used for legitimate business purposes including employment administration, contractual relationships, compliance obligations, due diligence processes, and operational risk management.

3. Types of Data Collected

The organization may collect identification details, contact information, employment history, financial or contractual information, and other data necessary for lawful business operations. Sensitive personal data may be collected only when required to fulfill legal or operational responsibilities.

4. Limitation of Use

Personal data shall be used exclusively for the purposes described in this Notice and shall not be disclosed to third parties except where necessary for contractual performance or legal compliance.

5. Data Transfers

Personal data may be shared with third parties that support the organization's operations, provided they maintain confidentiality and appropriate safeguards.

6. Rights of Individuals

Individuals may request access, correction, deletion, or limitation of use of their personal data through the organization's Compliance function.

7. Data Security

EMES Ventures Inc. shall implement reasonable safeguards to protect personal data.

8. Retention

Personal data shall be retained only as long as necessary for legal or operational purposes.



9. Updates

This Notice may be updated periodically.



ANNEX 2 - DATA SUBJECT RIGHTS REQUEST PROCEDURE

1. Purpose

This Procedure establishes the process through which individuals may exercise their rights concerning personal data held by EMES Ventures Inc..

2. Rights Covered

Individuals may request access, correction, deletion, or limitation of processing of their personal data.

3. Submission

Requests shall be submitted in writing to the Compliance function.

4. Review

Requests shall be reviewed to verify validity and completeness.

5. Response

EMES Ventures Inc. shall respond within a reasonable timeframe in accordance with applicable requirements.

6. Limitations

Requests may be limited where necessary to comply with legal obligations or legitimate business needs.

7. Recordkeeping

All requests and responses shall be documented.

8. Responsibility

The Compliance function shall oversee administration of this Procedure.