

Data Privacy Notice and Consent

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding information submitted by them through this system, as well as consent to certain terms and conditions regarding the information submitted by that person. Since you have indicated that you either live in or are reporting about a matter that occurred in a country with such regulations, you are being asked to read and accept the terms contained in the Consent below. If you do not wish to accept the terms below, we are unable to accept any information through this system and would ask that you please report this matter directly to your manager or supervisor, an Oceaneering Compliance Champion, or the Legal, Compliance or Human Resources Departments depending on the nature of the possible violation.

The Oceaneering Ethics Hotline (“Hotline”) is a confidential online reporting system operated by NAVEX Global, Inc. and provided by Oceaneering to allow people to ask questions and to report suspected violations of company policy or applicable laws and regulations. Use of the Hotline is entirely voluntary. You are encouraged to ask questions or report possible violations directly to your manager or supervisor, an Oceaneering Compliance Champion, or the Legal, Compliance or Human Resources Departments depending on the nature of your question(s) or the possible violation. If you feel that you are unable to do so, you may use the Hotline to ask your question(s) or make your report. In certain countries, Oceaneering may not be able to accept certain categories of question or report through the Hotline. If your concern pertains to a matter that, under local law, may not be accepted by Oceaneering through the system, you will need to contact Oceaneering’s Legal, Compliance or Human Resources Departments to report the matter.

Before proceeding further, please read the notice below and, if you agree, check the consent box that follows. You will then be able to ask question(s) or submit a report via the Hotline. If you do not provide your consent, you will not be able to ask question(s) or submit a report and you are encouraged to ask your question(s) or report possible violations directly to your manager or supervisor, an Oceaneering Compliance Champion, or the Legal, Compliance or Human Resources Departments depending on the nature of the possible violation.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company’s operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and factual. You will not be subject to retaliation from Oceaneering for any report of a suspected legal or compliance violation that is made in good faith, even if it later turns out to be incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially, as far as reasonably possible, and we encourage you to identify yourself in order for us to follow up with questions we may have.

What information is collected?

The Hotline gives you the option to make your report anonymously or by disclosing your identity. Oceaneering encourages you to identify yourself so that efforts to investigate and remedy violations will not be hampered. If you choose not to remain anonymous the Hotline will capture the following information if provided by you: your name and contact details (email address, telephone number), any question(s) or concerns you may have, the name and title of all individuals you may be reporting. In each case the Hotline will capture a description of the suspected legal or compliance violation including all relevant facts and details as submitted by you.

How will the information be used?

The information you provide will be stored on servers hosted by NAVEX Global, Inc. in the USA (“NAVEX Global”).

NAVEX Global will not have direct responsibility for the processing of your personal data. Rather, if you ask question(s) or submit a report via the Hotline which requires that NAVEX Global processes personal data for the performance of the Hotline, it does so in the capacity of data processor, on behalf of and further (only) to Oceaneering instructions as data controllers for your personal data. Consequently, the data controllers, responsible for the processing your personal data, remain the same i.e., Oceaneering International Inc. 11911 FM 529, Houston, Texas 77041-3011, USA and your Oceaneering employing entity.

Unless otherwise required by law, the information within the Hotline database may only be reviewed and used by those individuals who need to access the data to fulfil their job duties. These individuals may include appropriate Oceaneering employees in the Legal, Compliance or Human Resources Departments, personnel in the company's Finance, IT and Audit functions, external Oceaneering advisors retained to assist in answering your question(s) or investigating your report, and/or technical staff at NAVEX Global or interpreters or translators of any question(s) asked or report submitted in a language other than the English language. Those individuals may be located in the USA or elsewhere in the world other than your home location. In addition, some or all of the information you provide may be stored in Oceaneering's systems in the USA and elsewhere in the course of answering your question(s) or investigating your report. Oceaneering and/or NAVEX Global may also share information for the purposes of responding to internal or external audit and inquiries, law enforcement requests, requests from administrative or judicial authorities or where required by applicable laws, court orders, or government regulations.

Oceaneering will evaluate the information you provide and may conduct an investigation. Your cooperation and assistance in that investigation may be necessary. If an investigation indicates that a violation of company policy or applicable laws or regulations has occurred, Oceaneering will take such action as it determines to appropriate under the circumstances.

Please note that because of applicable laws, individuals you identify through the Hotline may be informed about the fact that a report has been made. However, to the extent reasonably possible, Oceaneering will not reveal your name or identity. All individuals you identify will have the right to respond to or correct information you report.

Any information you submit that is not needed to answer your question(s) or for the investigation of any incident may be deleted or archived, as permitted by local law. In addition, once we have responded to your question(s) or completed any investigation, all information you submitted will be deleted or archived as required by local law. Oceaneering will take appropriate technical, organizational, and legal steps to secure the information you provide. Oceaneering also requires NAVEX Global to adequately secure your personal data and not use it for any unauthorized purposes. (See the NAVEX Global, Inc. Privacy Policy for additional information: <http://www.navexglobal.com/privacy-statement>).

NAVEX Global has committed to providing protections agreed upon by the relevant European authorities and the US Department of Commerce. Furthermore, Oceaneering International Inc. and your Oceaneering employing entity have also entered into a data transfer agreement conforming to the required legal standards and best practice where we operate, including the EU Commission Standard Contractual Clauses where required, to help ensure that transfers of personal data from Oceaneering to NAVEX Global receive an adequate level of data protection within the meaning of applicable data protection laws.

Further information regarding our privacy handling practices, including how you may access and seek correction of information we hold about you, and how we deal with complaints, can be obtained from the Oceaneering Legal, Compliance or Human Resources Departments.