



Privacy Policy for Golden Ocean

*This privacy policy ("**Privacy Policy**") covers Golden Ocean Group Limited and all subsidiaries controlled by Golden Ocean Group Limited (each referred to as "**Golden Ocean**", the "**Company**" or "**we/us**"). The controller of your personal data is the Company to which you (or your business) have a relationship.*

This Privacy Policy provides you with information on how your personal data is processed and your data protection rights according to the GDPR¹. Note that where a Company is not subject to the GDPR, because (i) it is not established in the EU/EEA, or (ii) it does not process personal data of data subjects in the EU/EEA relating to (a) the offering of goods or services in the EU/EEA or (b) the monitoring of behavior in the EU/EEA, the Company may deviate from this Privacy Policy to the extent required or permitted under laws and regulations to which the Company is subject.

1. Why, what and on which basis do we process personal data about you.

We only process personal data to the extent that we have a legal basis for such processing, which generally include the following purposes:

- ✓ You have subscribed to our press releases: If you have subscribed to our press releases on our website, we will process the personal data you provided us in connection with signing up, such as name and email address. The legal basis for this processing is your consent to receive our press releases (Article 6 (1) (a) of the GDPR). At any time, you can withdraw your consent by using the unsubscribe feature or by contacting us.
- ✓ You have requested information from us: We process contact information you provide, such as name, phone number, address and email address, to respond to your request (e.g. to send you information about our business) and for other business purposes. The legal basis for this processing is our legitimate interest in responding to your requests (Article 6 (1) (f) of the GDPR).
- ✓ You are the contact person of a third party with whom we have an agreement: We process contact information, such as name, phone number, address and email address, in relation to contracts with service and administration providers, customers and similar third parties of which you are a contact person or otherwise have a role relevant for our business. The legal basis for this processing is that it is necessary for our legitimate interest in administration and performance of the contract with such party (Article 6 (1) (f) of the GDPR).
- ✓ You are an investor or possible investor in our company: We process contact information, such as name, phone number, address and email address, economic information if relevant, and KYC information if required. The legal basis for this processing is that it is necessary for the administration and performance of the investment relationship with you (Article 6 (1) (b) of the GDPR).
- ✓ You have applied for a job with us: We process personal data about you in the event you choose to apply for a position with us. This will be personal data that you have provided in order for us to process your application, and necessary information we will obtain from references. The legal basis for

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

this processing is that processing is necessary to establish whether we will enter into an employment contract with you (Article 6 (1) (b) of the GDPR).

- ✓ You use a Webcast-link on our website: If you use a webcast-link on our website in order to follow financial reports, we will process the personal data you provided us in connection with registering, such as name and email address. The legal basis for this processing is our legitimate interest in obtaining information about the individuals that will follow the report and who to provide the webcast-link (Article 6 (1) (f) of the GDPR).
- ✓ We are legally obliged to do so: In other instances we may process your personal data because we are obliged to do so by law, for example pursuant to bookkeeping or tax regulations (Article 6 (1) (c) of the GDPR).

We may also use your personal data for other purposes not incompatible with the purposes listed above, such as audits, dispute resolutions, business development and mergers and acquisitions.

We do not make decisions with legal or similar effects that are fully automated (without human intervention), nor do we perform profiling of you (analysis of your interests, preferences etc.).

For visitors on our website(s), we may use cookies and similar technology.

2. How do we protect your personal data?

We protect your personal data in various ways, such as through firewalls, passwords, and by controlling who has access to our buildings. Only authorized persons can access your personal data and we ensure that our employees only process personal data in a lawful and confidential manner.

In the case of a personal data breach, we will notify you in accordance with the GDPR (if applicable), if the breach is likely to result in a high risk to your rights and freedoms.

3. To whom do we disclose your personal data?

As a main rule, we do not disclose your personal data to third parties without your consent. However, we may disclose your personal data to third parties in the following situations without your consent:

- ✓ Group companies. To other Golden Ocean companies to the extent reasonably necessary to fulfil the purposes described above under Section 1.
- ✓ Advisors. To accountants, legal counsel and similar advisors to the extent reasonably necessary to fulfil the purposes described above under Section 1.
- ✓ Authorities. To courts, public authorities and similar bodies to the extent reasonably necessary to comply with their requests or for us to establish, exercise or defend legal claims.
- ✓ Service providers. To IT vendors and other service providers that process personal data on behalf of us as processors. We will enter into data processing agreements with them to safeguard your data.

Disclosure of data to some group companies, and to some of the third parties mentioned above, may involve transfer of personal data from the EU/EEA to a country outside the EU/EEA. If so, will ensure that such transfer of personal data is carried out in accordance with GDPR Chapter V (if applicable), such as to conclude the [EU standard contractual clauses](#).

4. How long do we keep your personal data?

We store your personal data as long as necessary in order to fulfil the purpose for which the data is processed

and we have legal basis to process the data. The criteria we use to determine when to delete the personal data are generally as follows:

- ✓ Legitimate business reasons. If we process your personal data to fulfil an agreement with your business, the data is deleted without undue delay after the agreement has been terminated, all obligations arising from the agreement are fulfilled, and we do no longer have any need for the data to conduct our legitimate business interests.
- ✓ Legal obligations. If we process your personal data to fulfil a legal obligation, the data will be deleted without undue delay after the legal obligations expire, unless we have other legitimate business reasons for continued data retention (see criterion above).
- ✓ Consents. If we process your personal data based on your consent, we will delete your data without undue delay after you have withdrawn your consent unless we have other legitimate business reasons for continued data retention (see criterion above).

5. What rights do you have when we process personal data about you?

Applicable laws and regulations may offer you certain privacy rights.

According to the GDPR (if applicable) you can at any time request access to, rectification or erasure of your personal data. Additionally, you can object to or request restriction of processing, and request that your data is being transmitted to another entity. Note that conditions and limitations apply to these rights.

You can make use of these rights by using the contact details set out in Section 7 below. You will receive a reply without undue delay and typically within 30 days at the latest.

If you experience that we do not process your data in accordance with the GDPR (if applicable), or that we do not fulfil your rights, you can lodge a complaint. Questions and complaints can be addressed to us by using the contact details mentioned in Section 7 below. Alternatively, you can lodge a complaint with the relevant supervisory authority. For the EU/EEA, you can find more information about the supervisory authorities on <https://ec.europa.eu>. We would appreciate if you contact us before you lodge a complaint, so that we may assist you and clarify any misunderstandings.

6. Changes

In the event of changes to our business or applicable laws and regulations, we may make changes of this Privacy Policy. Updated information will always be available on our website.

7. Contact details

You may direct any questions or comments you may have about our processing of your personal data, for further information, or to use your rights, by contacting us at gdpr@goldenocean.no.