

TGS Data Privacy for Employees, Customers and Suppliers

Dated: July 1 2018

I. OBJECTIVE

The aim of this Privacy Policy ("the Policy") is to provide adequate and consistent safeguards for the handling of Personal Data (as defined below) by all "TGS companies" (as defined below) in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the General Data Protection Regulation or "GDPR") and all other applicable data protection laws.

II. WHO IS TGS AND HOW TO CONTACT IT

This Policy is issued by and applies to all TGS companies that process Personal Data. They are the data controllers for the purpose of GDPR. A list of these can be found in the attached appendix. Unless otherwise stated in the appendix, their contact details for all matters relating to this Policy or data protection is compliance@tgs.com.

III. INTERPRETATION AND SCOPE

In this Policy:

"Consumer" means any natural person, but excludes any individual acting in his or her capacity as an Employee or Supplier.

"Controller" means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

"Employee" means any current, former or prospective employee, temporary worker, intern or other non-permanent employee of TGS or any current or prospective subsidiary or affiliate of TGS.

"European Economic Area ("EEA")" means the following countries: Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Republic of Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the UK.

TGS means all TGS companies, namely, TGS-NOPEC Geophysical Company ASA and its wholly-owned subsidiaries, as set forth in the Appendix.

"Personal Data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity and includes information, that (i) relates to an identified or identifiable Consumer, Employee or Supplier's representative; (ii) can be linked to that Consumer, Employee or Supplier's representative; and (iii) is recorded in any form.

"Personal Data Breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

"Sensitive Personal Data" means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership or concerning health or sex, and the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.

"Supplier" means any supplier, vendor or other third party that provides services or products to TGS including independent contractors and which in doing so processes Personal Data on its behalf.

"Personal Data Protection Representative" means individual officers designated by TGS as the initial points of contact for inquiries, complaints, or questions regarding privacy matters. Currently, such officers are identified at the end of this Policy.

"Processing" is defined as any action that is performed on Personal Data, whether or not by automated means, such as collecting, storing, modifying, using, disclosing, or deleting such data.

This Policy does not cover data rendered anonymous or where pseudonyms are used. Data is rendered anonymous if individuals are no longer identifiable or are identifiable only with a disproportionately large expense in time, cost or labor. The

use of pseudonyms involves the replacement of names or other identifiers with substitutes, so that identification of individual persons is either impossible or at least rendered considerably more difficult. If data rendered anonymous become no longer anonymous (i.e. individuals are again identifiable), or if pseudonyms are used and the pseudonyms allow identification of individual persons, then this Policy shall apply again.

IV. APPLICATION OF LOCAL LAWS

This Policy is designed to provide compliance with all relevant applicable laws, including those in the EEA, the General Data Protection Regulation. TGS recognizes that certain laws might be modified to require stricter standards than those described in this Policy, in which case the stricter standards shall apply. TGS will handle Personal Data in accordance with local law at the place where the Personal Data is processed. If applicable law provides for a lower level of protection of Personal Data than that established by this Policy, then this Policy shall prevail. Any questions about applicable legislation and TGS's compliance with it shall be addressed to TGS using the above contact information.

V. PRINCIPLES FOR PROCESSING PERSONAL DATA

TGS respects Employee, Supplier, and Consumer (including personnel of consumers, suppliers, stakeholders, and third parties) privacy and is committed to protecting Personal Data in compliance with all applicable legislation. This compliance is consistent with TGS's desire to keep its Employees, Suppliers, and Consumers informed and to recognize and respect their privacy rights. TGS will observe the following principles when processing Personal Data:

- Personal Data will be processed fairly and in accordance with applicable law
- Personal Data will be collected for specified, legitimate purposes and not processed further in ways incompatible with those purposes
- Personal Data will be relevant to and not excessive for the purposes for which they are collected and used. For example, data may be rendered anonymous if deemed reasonable, feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses
- Consumers will be asked to provide their clear and unequivocal consent for the collection, processing and transfer of their Personal Data where consent is the legal basis of processing. Personal Data will, to the best of TGS's knowledge, be accurate and, where necessary kept up to-date. Reasonable steps will be taken to rectify or delete Personal Data that TGS becomes aware is inaccurate or incomplete
- Personal Data will be processed only for the purposes for which it was collected. Those purposes shall be described in this Policy
- Data will be processed in accordance with the data subject's legal rights (as described in this Policy or as provided by law)
- Appropriate technical, physical and organizational measures will be taken to prevent unauthorized access, unlawful processing and unauthorized or accidental loss, destruction or damage to Personal Data. In case of any such violation with respect to Personal Data, TGS will take appropriate steps to end the violation and determine liabilities in accordance with applicable law and will cooperate with the competent authorities

VI. TYPES OF DATA PROCESSED

As permitted by local laws, the Personal Data relating to Employees may include the following:

- Name
- Contact information
- Date of birth
- Photographs
- Government-issued identification information, passport or visa information
- Educational history
- Employment and military history
- Gender

- Race/ethnicity
- Disability status and health information
- Criminal history
- Legal work eligibility status
- Information about job performance, compensation, and employee benefits (insurance, etc.)
- Financial account information
- Other information Employees may provide

Personal Data relating to Consumers may include:

- Contact information, such as name, job title, company, postal address, email address and telephone number
- Personal Data in content Consumers provide on TGS's website and other data collected automatically through the website (such as IP addresses, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our website, and dates and times of website visits)
- Financial account information
- TGS also may obtain and use Consumer Personal Data in other ways for which TGS provides specific notice at the time of collection (including but not limited to items such as surveys, inbound and outbound Consumer communications and education, etc.)

Personal Data relating to Suppliers may include:

- Contact information, such as name, job title, company, postal address, email address and telephone number, tax identification number, bank account information, information required to TGS to perform due diligence, HSE-related, and/or background checks, health and safety-related reports, testing, and certifications required by law to perform services
- Personal Data in content Suppliers provide on TGS's website and other data collected automatically through the website (such as IP addresses, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our website, and dates and times of website visits)

VII. WAYS OF OBTAINING PERSONAL DATA

The ways by which TGS obtains Personal Data are defined below:

TGS generally obtains personal information about Employees, Suppliers, or Consumers from the data subjects directly, for example by them doing any of the following: registering on TGS's website, completing a written employment application, employee benefits application, insurance form, consent form, survey, or completion of an on-line or hard copy form. Employees, Suppliers, and Consumers may choose to submit private information by fax, regular mail, interoffice mail, electronic transmission over our internal web site, or use of a web portal.

TGS may also obtain Personal Data about Employees, Suppliers and Consumers from third parties.

VIII. PURPOSES AND LEGAL BASES FOR PERSONAL DATA PROCESSING

TGS processes personal data for purposes related to human resources and employment, business and safety /security. The limitation of purposes shall be taken into consideration before any type of processing of Personal Data and shall not be subject to any changes without prior notification. The principal purposes for processing Employee Personal Data include:

- Human resources and employment purposes including but not limited to recruiting and hiring job applicants
- Managing Employee communications and relations
- Providing compensation and benefits
- Administering payroll
- Processing corporate expenses and reimbursements
- Managing Employee participation in human resources plans and programs
- Carrying out obligations under employment contracts

- Managing Employee performance
- Conducting training and talent development
- Facilitating Employee relocations and international assignments
- Managing Employee headcount and office allocation
- Managing the Employee termination process
- Managing information technology and communications systems, such as the corporate email system and company directory
- Conducting ethics and disciplinary investigations
- Administering Employee grievances and claims
- Managing audit and compliance matters
- Complying with applicable legal obligations, including government reporting and specific local law requirements
- Carrying out TGS's obligations under such employment contracts
- Other general human resources purposes

TGS may also obtain and process Personal Data about Employees' emergency contacts and other individuals (such as spouse, family members, dependents and beneficiaries) to the extent Employees provide such information to TGS. TGS processes this information to comply with its legal obligations and for benefits administration and other internal administrative purposes.

The principal purposes for processing Consumer Personal Data include:

- Running day-to-day business relationships
- Marketing activities, including direct marketing
- Management of financial accounts
- Business Development Activities
- Conduct of transactions or facilitation of offering of the TGS Services
- Conduct of surveys, focus groups, market research, inbound and outbound Consumer communications and education
- Product and service development

The principal purposes for processing Supplier Personal Data include:

- Management of its relationships with Suppliers
- Processing payments, expenses and reimbursements
- Vetting potential Suppliers for suitability to provide services
- Carrying out TGS's obligations under such contracts between the Supplier and TGS

For all of the above types of Personal Data, the purposes of processing include:

- Preventing fraud
- Maintaining network security
- Internal administration not included above
- TGS actual or proposed corporate activities, such as sale or merger
- Complying with legal requirements, judicial process, and company policies
- Providing information such as changes to this Policy

If TGS introduces a new process or application that will result in the processing of Personal Data for purposes that go beyond the purposes described above, TGS will inform the concerned data subjects of such new process or application, new purpose for which the Personal Data are to be used, and the categories of recipients of the Personal Data.

The legal bases for such processing are as follows, depending on the purpose of the processing:

- Performance of a contract - in some cases TGS will need to process Personal Data to perform a contract with the data subject, for example to place orders with a Supplier or to fulfil orders with a Consumer or to take steps at the data subject's request before entering into a contract

- Consent - in certain specific situations, TGS may process Personal Data with the specific freely given consent of the data subject. When doing so, TGS will inform the data subject of the purpose of the processing and of his/her right to withdraw consent at any time
- Legal obligation - Where the purpose indicated above is that the processing is needed for TGS to comply with a relevant legal obligation, that is also the legal basis of processing
- Legitimate interest - in all other cases, the purposes described above represent TGS's legitimate business interests and the processing is necessary to achieve them and does not override the interests, fundamental rights or freedoms of the data subjects

IX. SECURITY AND CONFIDENTIALITY

TGS is committed to taking appropriate technical, physical and organizational measures to protect Personal Data against unauthorized access, unlawful processing, accidental loss or damage and unauthorized destruction.

Equipment and Information Security

To safeguard against unauthorized access to Personal Data by third parties outside TGS, all electronic Personal Data held by TGS are maintained on Systems that are protected by up-to-date secure network architectures that contain firewalls and intrusion detection devices. The data saved on servers is copied on separate media to avoid the consequences of any inadvertent erasure, destruction or loss otherwise. The servers are stored in facilities with access control, and other physical safeguards to protect against unauthorized personnel, as well as fire detection and response systems.

Access security

The importance of security for all personally identifiable information associated with TGS's Employees is of highest concern. TGS is committed to safeguarding the integrity of personal information and preventing unauthorized access to information maintained in TGS's databases. These measures are designed and intended to prevent corruption of data, block unknown and unauthorized access to our computerized system and information, and to provide reasonable protection of Personal Data in TGS's possession. All employee files are confidentially maintained in the HR department in secured and locked file cabinets or rooms. Access to the computerized database is controlled by a log-in sequence and requires users to identify themselves and provide a password before access is granted. Users are limited to data required to perform their job function. Security features of our software and developed processes are used to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

Training

TGS will be responsible for conducting adequate training sessions regarding the lawful, enumerated intended purposes of processing Personal Data, the need to protect and keep information accurate and up-to-date, the lawful purposes of collecting, handling and processing data that is transferred from the EU to the US and the need to maintain the confidentiality of the data to which employees have access. Authorized users will comply with this Policy and TGS will take appropriate actions in accordance with applicable law, if Personal Data are accessed, processed, or used in any way that is inconsistent with the requirements of this Policy.

Data Protection Impact Assessments

A Data Protection Impact Assessment (DPIA) is required when the processing of personal data is likely to result in a high risk to the rights and freedoms of an individual. In other words, a DPIA is required if the processing involves or may involve: (1) evaluating or scoring the individual based upon work performance, economic situation, health, behavior, location, etc. (i.e., credit check or sanctions screening); (2) automated decision making that would exclude or discriminate against individuals; (3) systematic monitoring of an individual; (4) sensitive personal data (see above definition); (5) personal data being processed on a large scale (i.e., large number of individuals, large volume of personal data, wide geographic disparity of personal data, etc.); (6) vulnerable categories of individuals (i.e., children); (7) innovative or new technological solutions (i.e., combining finger print and facial recognition for improved physical access); and/or (8) preventing an individual from exercising a right or using a service or contract.

The DPIA evaluates (1) the purpose of the processing of personal data and determine whether there is a legitimate and legal interest for the Company to do so; (2) the necessity and proportionality of the processing activity in relation to the purpose; (3) the risks to the data subject's freedoms and rights; and (4) the security and mitigation measures in place to protect the personal data.

Employees should contact the Corporate Compliance Director if an Employee's activities or the performance of their obligations involves or may involve the processing of personal data that may implicate one or more of the above factors. The Corporate Compliance Director will determine if a DPIA is necessary and then assist in drafting the assessment.

Reporting a Personal Data Breach or Security Incident

If an Employee knows or suspects that a Personal Data Breach (as defined above) has occurred, immediately contact the IT Director and the Compliance Director and follow TGS' Data Breach and Security Incident Plan. Employee should not attempt to investigate the matter themselves and should preserve any materials the Employee may have related to the Personal Data Breach.

X. RIGHTS OF DATA SUBJECTS

Any data subject has the right to be provided with confirmation as to whether TGS processes his or her Personal Data and, if so, information as to the nature of the Personal Data stored or processed about him or her by TGS and may request deletion or amendments.

All Employees, Consumers, and Suppliers can request a copy of their own Personal Data which TGS process and may correct or amend it as needed. Employees may view their own personnel record upon request by contacting the local HR contact or by accessing certain information in the company's internet and/or extranet. Consumers and Suppliers may contact TGS as noted above to review, update, and revise their Personal Data.

If access is denied, the Employee, Consumer, and Supplier has the right to be informed about the reasons for denial. TGS shall handle in a transparent and timely manner any type of complaint as to how about Personal Data is processed by TGS.

If any information is inaccurate or incomplete, the person may request that the data be amended. It is every person's responsibility to provide accurate Personal Data about him or her and to inform such contacts of any changes. (e.g. new home address or change of name).

Data subjects also have the following rights:

- To request that TGS delete their Personal Data, or stop processing it, in some circumstances
- In any specific case where TGS relies on consent for processing, the right to withdraw such consent, without affecting the lawfulness of processing before such withdrawal
- In certain cases, to request that TGS transfer or port elements of Personal Data to the data subject or a third party providing him or her with similar products
- To lodge a complaint with their local data protection regulator

XI. TRANSFERS

In connection with the activities described under Section VII, TGS may transfer Personal Data outside the EU and more specifically to: (i) TGS's operational headquarters in Houston, TX, USA; (ii) TGS's different offices in the US; (iii) TGS affiliated entities in the US. Moreover, Personal Data might be sent to the third parties described below in or outside the European Union(EU):

NOTE: The USA and most other countries outside the EU do not have the same data protection laws as the EU and the European Commission has determined that the United States of America (USA) does not have an adequate level of data protection as defined in Article 45 of the GDPR.

On occasion, such transfer may be necessary to perform a contract. In other cases, TGS will ensure at least one of the following safeguards is implemented:

- TGS will only transfer the Personal Data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or where TGS transfers the data to other companies within the TGS Group or third parties who are not within the EU or the above countries, TGS will use specific contracts between it and the recipient in a form approved by the European Commission

If you would like a copy of the above countries or the form of contract, please contact TGS using the contact details set out above.

Third Party Recipients to whom TGS may transfer or disclose Personal Data

TGS may transfer or disclose Personal Data to the below categories of recipients. TGS has adequate safeguards in place with third party vendors to ensure that Personal Data is kept confidential:

- Other companies in the TGS Group
- Website hosting partners and other parties who assist TGS in operating its websites
- Persons who assist TGS in conducting its business by providing services to TGS or to data subjects, including but not limited to:
 - » Email marketing communications providers, payment processors and the like
 - » A designated insurance provider or benefits administrator
 - » Travel professionals
 - » Information and technology services providers and cloud services providers for operational or back-up purposes
 - » Services related to money laundering checks, credit risk reduction, and other fraud and criminal prevention purposes
 - » Financial institutions, credit reference agencies, and related regulatory agencies
 - » Legal, financial, tax, accounting or other advisors who provide related services to TGS
 - » Accounting and payroll providers
- Consumers to illustrate experience and qualifications for business purposes or promotion
- Third party vendors and/or marketers upon Consumer' or Supplier's explicit consent or as a supplier or consumer may designate
- Other Third Parties: TGS may be required to disclose certain Personal Data to other third parties: (i) As a matter of law (e.g. to tax and social security authorities); (ii) to protect TGS's legal rights; (iii) in an emergency where the health or security of an employee is endangered (e.g. a fire); (iv) to Law Enforcement Authorities in accordance with relevant laws in the EU.

XII. PERIOD OF STORAGE

TGS will store Personal Data only for as long as it is proportionate for TGS to store it for the purposes of the processing, unless applicable law requires a longer retention period. This is determined on a number of factors such as the nature of the Personal Data, why it is collected and processed, and relevant legal or operational retention needs.

XIII. ENFORCEMENT RIGHTS AND MECHANISMS

TGS will ensure that this Policy is observed and duly implemented. All persons who have access to Personal Data must comply with this Policy. Violations of the applicable data protection laws may lead to penalties and/or claims for damages.

If at any time, a person believes that Personal Data relating to him or her has been processed in violation of this Policy, he or she may report the concern to TGS using the contact information noted above. In particular, if any employee has any inquiries or complaints about the use or limitation of use of an employee's personal information, the employee should contact his or her local human resource ("HR") contact or the HR department at corporate headquarters.

Employees

For Employee Personal Data, TGS is committed to cooperate with the different national EU Data Protection Authorities ("DPAs") and comply with the dispute resolution procedures such DPAs may indicate in cases of complaints by Employees as well as with any regulations or guidelines such DPAs may issue from time to time in accordance with data protection legislation.

XIV. COMMUNICATION ABOUT THE POLICY

In addition to the training on this Policy, TGS will communicate this Policy to current and new employees, suppliers, and consumers by posting it on the company's websites as well as on internal TGS websites and by providing a link to the Policy on information technology applications where Personal Data are collected and processed.

XV. MODIFICATIONS OF THE POLICY

TGS reserves the right to modify this Policy as needed, for example, to comply with changes in laws, regulations or requirements introduced by DPAs. Changes must be approved by TGS's Corporate Compliance Director or his/her designees who will seek input as they reasonably deem appropriate from corporate executives such as the CEO, CFO, and General Counsel, for the amended Policy to enter into force. If TGS makes changes to the Policy, this amended Policy will be submitted for renewed approval according to the relevant applicable provisions of the law. TGS will inform TGS Employees, Suppliers, Consumers and other persons (e.g. persons accessing TGS websites to enter Personal Data such as job application information) of any material changes in the Policy. TGS will post all changes to the Policy on relevant internal and external websites.

Effective with the implementation of this Policy, all existing and applicable company privacy guidelines relating to the collection and/or processing of Personal Data will, where in conflict, be superseded by the terms of this Policy. No other internal policy that conflicts with this Policy shall be applicable with respect to the protection of Personal Data handled by TGS. All parties to such agreements will be notified of the effective date of the implementation of the Policy.

XVI. OBLIGATIONS TOWARDS DATA PROTECTION AUTHORITIES

TGS will respond diligently and appropriately to requests from Data Protection Authorities ("DPAs") about this Policy or compliance with applicable data protection privacy laws and regulations. TGS's employees who receive such requests should contact their human resources manager or business legal counsel. TGS will, upon request, provide DPAs with names and contact details of relevant persons. With regard to transfers of Personal Data between TGS entities, the importing and exporting TGS entities will (i) cooperate with inquiries from the DPA responsible for the entity exporting the data and (ii) respect its decisions, consistent with applicable law and due process rights. With regard to transfers of data to third entities, TGS will comply with DPAs' decisions relating to it and cooperate with all DPAs in accordance with applicable legislation.

APPENDIX: TGS COMPANIES

As of 31 December 2017, TGS consists of:

Company Name	Country of Incorporation	Shareholding and voting power
TGS-NOPEC Geophysical Company ASA	Norway	Parent Company
TGS AP Investments AS	Norway	100%
Maglight AS	Norway	100%
TGS Contracting AS	Norway	100%
Marine Exploration Partners AS	Norway	100%
Aceca Norge AS	Norway	100%
TGS-NOPEC Geophysical Company , Ltd.	UK	100%
TGS Geophysical Investments, Ltd.	UK	100%
Aceca Ltd.	UK	100%
TGS Geophysical Company (UK) Ltd	UK	100%
Magsurvey, Ltd.	UK	100%
TGS-NOPEC Geophysical Company	USA	100%
A2D Technologies, Inc.	USA	100%
Parallel Data Systems, Inc.	USA	100%
Volant Solutions Inc.	USA	100%
Digital Petrodata LLC	USA	100%
TGS Alaska Company	USA	100%
TGS Mexico Contracting LLC	USA	100%
Calibre Seismic Company	USA	50%
TGS do Brasil Ltda	Brasil	100%
TGS-NOPEC Geophysical Company PTY, Ltd.	Australia	100%
TGS-NOPEC Geophysical Company PTE, Ltd.	Singapore	100%
TGS Canada Ltd.	Canada	100%
Arcis Seismic Solutions Corp.	Canada	100%
Arcis International Ltd.	Cyprus	100%
TGS-NOPEC Geophysical Company Moscow, Ltd.	Russia	100%
NOPEC Geophysical Company S. de R.L. de C.V.	Mexico	100%
TGS-Petrodata Offshore Services Ltd.	Nigeria	49%