



# General Privacy Policy

## Revision History

Rev Number	Reason for Revision	Approver	Approver Title	Date Approved
0	New Policy	Sean Markowitz	General Counsel and Corporate Secretary	05/22/2018

# General Privacy Policy



Controlled Document Type: Policy

## 1.0 Objective

The purpose of this Policy is to outline what we do with your personal data. It describes how we collect, use, and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

## 2.0 Scope

This Policy applies to personal data of customers, suppliers, counter-party traders, LNG companies, job applicants, and website users. To be clear, if you are a member of Cheniere staff, you should refer to the Cheniere Staff Privacy Policy that is available on the Cheniere intranet.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), the company responsible for your personal data is Cheniere Energy Inc. of Cheniere Corporate Headquarters, 700 Milam Street, Ste. 1900, Houston, Texas 77002, and its affiliates in Singapore, Chile, China, and the UK ("Cheniere" or "us"). While this privacy policy describes how we will process your personal data across the organization, the GDPR, a European piece of legislation, requires us to send out certain information which will only apply to individuals based within the European Union. We have indicated which sections of this privacy policy only apply to you if you are based in the European Union.

This Policy replaces and supersedes any previous policies addressing the same or similar issues, whether formal or informal. Cheniere reserves the right in its absolute discretion to alter, amend, or terminate this Policy in whole or in part at any time with or without notice. The applicable version of this Policy is maintained on the Cheniere intranet site. You should always check that you are referring to the latest version of this Policy if you have previously downloaded hard copies of this Policy.

While this Policy addresses most situations encountered in the workplace, scenarios may arise that are not covered by this Policy. Any questions regarding matters not covered by this Policy, including whether a contemplated use or action is permitted under the terms of this Policy should be addressed to the Human Resources team.

### 2.1 Location

Enterprise-wide

Security Classification: Unclassified	Page 2 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

## 2.2 Processes and Technologies

All telephones, computers, internet, and Wi-Fi systems, software and portals, accounts and/or networks including CRM systems

## 3.0 Policy

### 3.1 User Responsibility

All staff is required to comply with both the spirit and the letter of this Policy (and any other policies and documents referred to in it).

This General Privacy Policy should be read alongside the Employee Handbook in particular with regard to the provisions on the Acceptable Use Policy, the Monitoring and Data Handling Policy, and the Employee Handbook.

### 3.2 Type of Personal Data Collected (Short Form)

**Customer Data:** In order to ensure the smooth running of our agreements and dealings with you, we need to process certain information about you. We only ask for details that we need to carry out our necessary background checks, such as copies of the passports of relevant individuals within your organization (you may choose to share other relevant information with us). When you visit any of our facilities, we may also collect basic information such as your date of birth, and details of your driver's license and passport.

If you would like a more detailed description of the personal data that we collect about you, see Section 3.9 - Type of Personal Data Collected (Long Form).

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Website Users in this section.

**Supplier Data:** We need to collect a small amount of information from our suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organization so that we can communicate with you, along with information such as their date of birth, addresses, and citizenship. We also collect your bank details so that we can pay you for the services you provide.

If you would like a more detailed description of the personal data that we collect about you, see Section 3.9 - Type of Personal Data Collected (Long Form).

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Website Users in this section.

Security Classification: Unclassified	Page 3 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

**Counter-party Trader Data:** We collect contact details (such as names, phone numbers, job titles, and email/postal addresses) of relevant individuals in your organization to ensure that your interactions with us run smoothly. We also collect information that we require to carry out verification checks (i.e., copies of the passports of relevant individuals), in order to comply with our legal and regulatory obligations.

If you would like a more detailed description of the personal data that we collect about you, see Section 3.9 - Type of Personal Data Collected (Long Form).

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Website Users in this section.

**LNG Company Data:** We collect contact details (such as names, phone numbers, job titles, and email/postal addresses) of relevant individuals in your organization to ensure that your interactions with us run smoothly. We also collect information that we require to carry out verification checks (i.e., copies of the passports of relevant individuals), in order to comply with our legal and regulatory obligations.

If you would like a more detailed description of the personal data that we collect about you, see Section 3.9 - Type of Personal Data Collected (Long Form).

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Website Users in this section.

**Job Applicant Data:** If you are a job applicant, we may collect a range of personal information from you to enable us to engage in a recruitment exercise. For example, we may collect your contact details, your education and employment history, your nationality, relevant financial information, and information that we require for diversity monitoring.

If you would like a more detailed description of the personal data that we collect about you, see Section 3.9 - Type of Personal Data Collected (Long Form).

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Website Users in this section.

**Website Users:** We collect a limited amount of data from our website users that we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

If you would like a more detailed description of the personal data that we collect about you, see Section 3.15 – How Your Personal Data is Collected (Long Form) – Website Users.

Security Classification: Unclassified	Page 4 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

A number of elements of the personal data we collect from you are required to enable us to fulfill our contractual duties to you or to others. Other items may be needed to ensure that our relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfill our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

If you are based within the European Union, for details of the legal bases that we rely on to be able to use and process your personal data, see Section 3.29 - Legal Bases for Processing Your Data.

### 3.3 How Your Personal Data is Collected (Short Form)

**Customer Data:** We collect your personal data in three main ways: directly from you, from third parties, and automatically.

If you want to know more about how we collect your personal data, see Section 3.10 - How Your Personal Data is Collected (Long Form) – Customer Data.

To the extent that you access our website, or read, or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**Supplier Data:** We collect your personal data in three main ways: directly from you, from third parties, and automatically.

If you want to know more about how we collect your personal data, see Section 3.11 - How Your Personal Data is Collected (Long Form) – Supplier Data.

To the extent that you access our website, or read, or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**Counter-party Trader Data:** We collect your personal data in three main ways: directly from you, from third parties, and automatically.

If you want to know more about how we collect your personal data, see Section 3.12 - How Your Personal Data is Collected (Long Form) – Counter-party Trader Data.

To the extent that you access our website, or read, or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**LNG Company Data:** We collect your personal data in three main ways: directly from you, from third parties, and automatically.

Security Classification: Unclassified	Page 5 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

If you want to know more about how we collect your personal data, see Section 3.13 - How Your Personal Data is Collected (Long Form) – LNG Company Data.

To the extent that you access our website, or read, or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**Job Applicant:** We collect your personal data in three main ways: directly from you, from third parties, and automatically.

If you want to know more about how we collect your personal data, see Section 3.14 - How Your Personal Data is Collected (Long Form) – Job Applicant.

To the extent that you access our website, or read, or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**Website Users:** We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, see Section 3.8.8 - Cookies (What are they and how do we use them?).

## 3.4 How Your Personal Data is Used (Short Form)

**Customer Data:** We use your personal data to ensure the smooth running of our agreements with you. This may involve processing your personal data in the course of our trading activities, for example, where we store your details in order to be able to contact you. We will also process your personal data to help us establish, exercise or defend legal claims.

For more details on how we use your personal data, see Section 3.16 - How Your Personal Data is Used (Long Form) – Customer Data.

**Supplier Data:** The main reasons for using your personal data is to ensure that the contractual arrangements between us can properly be implemented, and so that we can comply with our legal and regulatory requirements.

For more details on how we use your personal data, see Section 3.17 - How Your Personal Data is Used (Long Form) – Supplier Data.

**Counter-party Trader Data:** The main reasons for using your personal data are to ensure that our relationship with you runs smoothly, and so that we have a record of the transactions, we have undertaken with you. We also use your personal data to comply with our legal and regulatory obligations.

Security Classification: Unclassified	Page 6 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

For more details on how we use your personal data, see Section 3.18 - How Your Personal Data is Used (Long Form) – Counter-party Trader Data.

**LNG Company Data:** We use your personal data to ensure that the contractual arrangements between us can be properly implemented, and so that we can offer our services to you. We also use your personal data to comply with our legal and regulatory obligations.

For more details on how we use your personal data, see Section 3.19 - How Your Personal Data is Used (Long Form) – LNG Company Data.

**Job Applicant Data:** The main reason for using your personal data is to facilitate the recruitment process. We will also use your personal data for things like diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

For more details on how we use your personal data, see Section 3.20 - How Your Personal Data is Used (Long Form) – Job Applicant Data.

**Website Users:** We use your data to help us to improve your experience when using our website, for example by analyzing your recent search criteria to help us to present content to you that we think you have an interest.

If you would like to find out more about cookies, including how we use them and what choices are available to you, Section 3.8.8 - Cookies (What are they and how do we use them?).

## 3.5 Shared Personal Data (Who do we share your personal data with?) (Short Form)

Where appropriate, and in accordance with local laws, we may share your personal data with our group companies, regulatory bodies or other authorities where we are required to do so, and third party services providers.

- If you are a job applicant, we may share your personal data with individuals and organizations that hold information about your application (e.g., with your previous employers). We may also share your personal data with third parties who provide services such as reference, qualification, and criminal convictions checks.
- If you are a customer, counter-party trader or an LNG company, we may share your personal data with other customers, counter-party traders or LNG companies where necessary for a transaction.

Security Classification: Unclassified	Page 7 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



**NOTE:** If Cheniere merges with or is acquired by another business, we may share your personal data with the new owners of the business.

If you would like to see a list of whom we may share your personal data with, see Section 3.22 - How do we share your Personal Data?

### 3.6 Safeguard (How do we safeguard your personal data?) (Short Form)

We care about protecting your information. That is why we put in place appropriate measures that are designed to prevent unauthorized access to, and misuse of, your personal data.

For more information on the procedures we put in place, see Section 3.23 – How do we safeguard your Personal Data?

### 3.7 Length of Time (How long do we keep your personal data?) (Short Form)

We ordinarily process your personal data throughout the course of our interactions and then generally retain it for an appropriate amount of time afterwards. The precise length of time depends on the type of data, our legitimate business needs, and other legal or regulatory rules that may require us to retain it for certain minimum periods.

Once we determine that we no longer need to hold your personal data, we delete it from our systems.

For more information on our policy for the retention of personal data, see Section 3.24 - How long do We Keep Your Personal Data?

### 3.8 Change Personal Data (How can you access, amend, or take back the personal data that you have given to us?) (Short Form)

Even if we already hold your personal data, if you are based within the European Union, you will have various rights in relation to your data. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws.

**NOTE:** We may keep a record of your communications to help us resolve any issues that you raise.

#### 3.8.1 Right to Object

If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request

Security Classification: Unclassified	Page 8 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



within one month (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

### 3.8.2 Right to Withdraw Consent

Where we have obtained your consent to process your personal data for certain activities (e.g., for profiling your suitability for certain roles), you may withdraw your consent at any time.

### 3.8.3 Data Subject Access Requests (DSAR)

You also have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update, or delete such information. At this point, we may comply with your request or, additionally do one of the following:

- We may ask you to verify your identity, or ask for more information about your request.
- Where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

### 3.8.4 Right to Erasure

In certain situations (e.g., where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within one month (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimize the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

### 3.8.5 Right of Data Portability

If you wish, you have the right to transfer your data from us to another data controller. We will help with this, either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

Security Classification: Unclassified	Page 9 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



**3.8.6 Right to Lodge a Complaint with a Supervisory Authority**

You also have the right to lodge a complaint with your local supervisory authority, see Section 3.28.1 - How can you Access, Amend or Take Back the Personal Data that you have given to us?

If you would like to know more about your rights in respect of the personal data we hold about you, see Section 3.28 – EU Residents – Additional Privacy Information.

**3.8.7 International Storage and Transfer (How do we store and transfer your data internationally?)**

Cheniere is a global organization, and in order for us to continue operating our business, we may have to transfer or store your data internationally.

For more information on the steps we take when we transfer and store your data internationally, see Section 3.26 – How Do We Store and Transfer Your Data Internationally?

**3.8.8 Cookies (What are they and how do we use them?)**

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are not harmful to your system, and are used by nearly all websites. We use cookies to track your activity, which helps us ensure you get the smoothest possible experience when visiting our website. Cookies also allow us to tailor what options you are presented with on your next visit. We can also use cookies to analyze traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

If you want to find out more about our use of cookies, and what your choices are, see 3.27 - Cookies.

**3.8.9 Reject Cookies (How-to)**

If you do not want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.

Most web browsers accept cookies but if you rather we do not collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full

Security Classification: Unclassified	Page 10 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For general information on cookies, including how to disable them, refer to [aboutcookies.org](http://aboutcookies.org). that also provides information on how to delete cookies from your computer.

## 3.9 Type of Personal Data Collected (Long Form)

The information described below is in addition to any personal data we are required by law to process in any given situation.

**Customer Data:** We will collect the contact details of individuals at your organization (e.g., names, telephone numbers, job title and email, or postal addresses) in order to ensure our relationship runs smoothly. Where we are required to carry out "Know Your Counter-party" verification checks, to comply with our legal and regulatory obligations, we may also collect specific information about relevant individuals, including, (e.g., copies of your passport/identity card). We may also hold extra information that someone in your organization has chosen to tell us or that you have chosen to tell a Cheniere staff member. In certain circumstances, (e.g., when you engage with our credit team, calls, instant messages and emails with you) may be recorded, depending on the applicable local laws and requirements. If we need any additional personal data for any reason, we will let you know.

When you visit any of our facilities, we may be required to carry out security clearance checks, to comply with our internal security obligations. As part of these security clearance checks, we may collect certain data from you, including your name, date of birth, details of your driver's license and passport, and if necessary, we may carry out background screening checks.

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Section 3.2 - Type of Personal Data Collected (Short Form).

**Supplier Data:** We will collect your contact details or the details of individuals at your organization (e.g., names, telephone numbers, job title, and email or postal addresses, locations of your relevant staff such as drivers) in order to ensure our relationship runs smoothly. Where we are required to carry out our "Vendor Setup" checks, to comply with our legal obligations, we may also collect specific information about your organization, including, information about relevant individuals such as their name, date of birth, phone and fax number, email and postal addresses, and citizenship. We will also collect bank details and your US taxpayer identification number (if applicable), so that we can pay you. We may also

Security Classification: Unclassified	Page 11 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

hold extra information that you chose to tell us. In certain circumstances, such as when you engage with our Accounts Payable team, our calls with you may be recorded, depending on the applicable local laws and requirements.

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Section 3.2 - Type of Personal Data Collected (Short Form).

**Counter-party Trader Data:** We will collect your contact details (e.g., names, telephone numbers, job title, email or postal addresses) in order to ensure the interactions between you and relevant Cheniere staff run smoothly. Where we are required to carry out "Know Your Counter-party" verification checks, to comply with our legal and regulatory obligations, we may also collect specific information about relevant individuals, including, copies of their passport/identity card. We may hold additional information that someone in your organization has chosen to tell us or that you have chosen to tell a Cheniere staff member. In certain circumstances, calls, instant messages, and emails with you may be recorded, depending on the applicable local laws and requirements.

We will also collect your passport number or national identification number as well as your date of birth in order to comply with our legal and regulatory obligations.

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Section 3.2 - Type of Personal Data Collected (Short Form).

**LNG Company Data:** We will collect the contact details of individuals at your organization (e.g., names, telephone numbers, job title, and email or postal addresses) in order to ensure our relationship runs smoothly. Where we are required to carry out our "Know your Counter-party" checks, to comply with our legal obligations, we may also collect specific information about relevant individuals, including, copies of their passport/identity card. We will also collect bank details, so that we can pay you. We may also hold extra information that you have chosen to tell us or that you have chosen to tell a Cheniere staff member. In certain circumstances, calls, instant messages, and emails with you may be recorded, depending on the applicable local laws and requirements.

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Section 3.2 - Type of Personal Data Collected (Short Form).

**Job Applicant Data:** Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to engage in a recruitment exercise:

Security Classification: Unclassified	Page 12 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

- Name
- Age/Date of birth
- National identification number
- Sex/Gender
- Marital status
- Contact details, such as address, email address, and telephone number
- Photograph
- Education details
- Employment history and locations of previous employment
- Emergency contacts and details of any dependents
- Referee details
- Your signature, including in electronic form
- Immigration status (whether you need a work permit)
- Nationality/Citizenship/Place of birth
- Copy of your driver's license and/or passport/identity card
- Financial information (where we need to carry out financial background checks)
- Social security number (or equivalent in your country) and any other tax-related information
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information
- Details of any criminal convictions if this is required for a role that you are interested in applying for
- Details about your current or former role(s), including remuneration, pension, and benefits arrangements
- Biometric information

Security Classification: Unclassified	Page 13 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

- Information on your interests and needs regarding future employment, both collected directly and inferred, (e.g., from jobs viewed or articles read on our website)
- Extra information that you choose to tell us
- Extra information that your referees choose to tell us about you
- Extra information that our customers may tell us about you, or that we find from other third party sources such as job sites
- IP address
- Closed Caption Television (CCTV) footage if you attend our premises
- Communications that you send to Cheniere which pass through Cheniere's systems including email, instant messages, social media posts, text messages, and app-based messages (such as WhatsApp)

**NOTE:** The above list of categories of personal data we may collect is not exhaustive.

To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, see Section 3.2 - Type of Personal Data Collected (Short Form).

**Website Users:** We collect a limited amount of data from our website users that we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in, and the times that our website is most popular. If you contact us via the website, we will collect any information that you provide to us, (e.g., your name and contact details).

If you would like to find out more information about what data we collect about you when you visit our website, please click see Section 3.25 - Who is Responsible for Processing Your Personal Data and How to Contact Us?

**NOTE:** Communications to and from Cheniere staff including emails may be reviewed as part of internal or external investigations (including regulatory investigations) or litigation.

## 3.10 How Your Personal Data is Collected (Long Form) – Customer Data

We collect customer personal data in three ways:

- Personal data that we receive directly from you

Security Classification: Unclassified	Page 14 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

- Personal data that we receive from other sources
- Personal information that we collect automatically

## 3.10.1 Personal Data We Receive Directly from You

We will receive data directly from you in three ways:

- Where you have completed any forms required for our "Know your Counter-party" verification checks or security clearance checks
- Where you contact us proactively, usually by phone or email or any other form of communication
- Where we contact you, whether by phone, by email, or by any another form of communication

## 3.10.2 Personal Data We Receive from Other Sources

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organization from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analyzing online and offline media (which we may do ourselves, or employ other organizations to do for us)
- From other limited sources and third parties (e.g., from third party brokers to the extent that they provide us with your details in accordance with any regulatory requirements)

## 3.10.3 Personal Data Collected Automatically

To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may collect your data automatically or through you providing it to us. For more information please see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users.

## 3.11 How Your Personal Data is Collected (Long Form) – Supplier Data

We collect supplier personal data in three ways:

- Personal data that we receive directly from you
- Personal data that we receive from other sources

Security Classification: Unclassified	Page 15 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



- Personal information that we collect automatically

### 3.11.1 Personal Data We Receive Directly from You

We will receive data directly from you in three ways:

- Where you have completed any forms required for our "Vendor Setup" verification checks
- Where you contact us proactively, usually by phone or email
- Where we contact you, either by phone or email

### 3.11.2 Personal Data We Receive from Other Sources

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organization from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analyzing online and offline media (which we may do ourselves, or employ other organizations to do for us)
- From other limited sources and third parties

### 3.11.3 Personal Information Collected Automatically

To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may collect your data automatically or through you providing it to us. For more information, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users.

## 3.12 How Your Personal Data is Collected (Long Form) – Counter-party Trader Data

We collect counter-party trader personal data in three primary ways:

- Personal data that you give to us
- Personal data that we receive from other sources
- Personal information that we collect automatically

Security Classification: Unclassified	Page 16 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		





### 3.12.1 Personal Data We Receive Directly from You

We will receive data directly from you in three ways:

- Where you have completed any forms required for our "Know your Counter-party" verification checks
- Where you contact us proactively, usually by phone or email
- Where we contact you, either by phone or email

### 3.12.2 Personal Data We Receive from Other Sources

- Cheniere needs to know certain information about you, (e.g., your date of birth and a national identification number) in order to comply with its legal and regulatory obligations.
- Where appropriate and in accordance with any local laws and requirements, we will be provided with such information about you from your organization.

### 3.12.3 Personal Information Collected Automatically

To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users.

## 3.13 How Your Personal Data is Collected (Long Form) – LNG Company Data

We collect LNG company personal data in three primary ways:

- Personal data that you give to us
- Personal data that we receive from other sources
- Personal information that we collect automatically

### 3.13.1 Personal Data We Receive Directly from You

We will receive data directly from you in three ways:

- Where you have completed any forms required for our "Know your Counter-party" verification checks

Security Classification: Unclassified	Page 17 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



- Where you contact us proactively, usually by phone or email
- Where we contact you, whether by phone, by email, or in person to relevant Cheniere staff

### 3.13.2 Personal Data We Receive from Other Sources

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organization from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analyzing online and offline media (which we may do ourselves, or employ other organizations to do for us)
- From other limited sources and third parties

### 3.13.3 Personal Information Collected Automatically

To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users.

## 3.14 How Your Personal Data is Collected (Long Form) – Job Applicant Data

We collect personal data in three primary ways:

- Personal data that you give to us
- Personal data that we receive from other sources
- Personal information that we collect automatically

### 3.14.1 Personal Data We Receive Directly from You

Cheniere needs to know certain information about you in order to engage in a recruitment exercise and appoint the best applicants to Cheniere.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

- Entering your details on the Cheniere website or via an application form, as part of the registration process

Security Classification: Unclassified	Page 18 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

- Leaving a hard copy CV at a Cheniere office
- Emailing your CV to a Cheniere employee such as HR

### 3.14.2 Personal Data We Receive from Other Sources

We also receive personal data about job applicants from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you.
- We may obtain information about you from searching for potential applicants from third party sources, such as LinkedIn and other job sites.
- If you 'like' our page on Facebook or 'follow' us on Twitter (or similar) we will receive your personal information from those sites.
- If you were referred to us through a recruitment agency or consultant or a (current or former) Cheniere employee, they may share personal information about you with us.
- We may obtain information about you from third party service providers who undertake background checks about you on our behalf.

### 3.14.3 Personal Information Collected Automatically

To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users.

## 3.15 How Your Personal Data is Collected (Long Form) – Website Users

When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, (e.g., by using the chat function).

We collect your data automatically via cookies, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, see Section 3.27 – Cookies.

Security Classification: Unclassified	Page 19 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



## 3.16 How Your Personal Data is Used (Long Form) – Customer Data

Having obtained data about you, we then make sure we use it appropriately.

We use your personal data for the following:

- Trading activities
- To help us establish, exercise, or defend legal claims

### 3.16.1 Trading Activities

Below are the various ways in which we use your data in order to ensure the smooth running of our agreements and dealings with you:

- Processing your data in order to carry out anti-money laundering and "Know Your Counter-party" checks in accordance with our legal and regulatory obligations or processing your data to comply with any of our other legal and regulatory obligations
- Processing your data where you visit one of our facilities in order to carry out our security clearance checks in accordance with our internal security obligations
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to our relevant activities
- Reviewing, verifying, and keeping records of our conversations, meetings, and transactions, so that we can provide targeted services to you and in order to comply with our legal and regulatory obligations
- Undertaking customer satisfaction surveys

If you are based within the European Union, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users for information about the legal bases we rely upon to process your personal data.

If you are based within the European Union, in certain circumstances you have the right to object and can find out more about how and when to do this. See Section 3.29.1 – Legitimate Interests.

### 3.16.2 To Help Us Establish, Exercise, or Defend Legal Claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise, or defend legal claims (including issues raised with us, through our external whistleblowing hotline).

Security Classification: Unclassified	Page 20 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



## 3.17 How Your Personal Data is Used (Long Form) – Supplier Data

We use your personal data for the following:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements or our dealings with you
- To offer services to you or to obtain support and services from you
- To comply with certain legal and regulatory obligations, such as carrying out anti-money laundering, "Vendor Setup," and "Know Your Counterparty" checks;
- Facilitating our payroll and invoicing processes
- In more unusual circumstances, to help us to establish, exercise, or defend legal claims (including issues raised with us, through our external whistleblowing hotline)

If you are based within the European Union, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users for information about the legal bases we rely upon to process your personal data.

If you are based within the European Union, in certain circumstances you have the right to object and can find out more about how and when to do this. See Section 3.29.1 – Legitimate Interests.

## 3.18 How Your Personal Data is Used (Long Form) – Counter-party Traders

We use your information in the following ways:

- Storing (and updating when necessary) your details on our database, so that relevant Cheniere staff can contact you
- Monitoring and storing records of calls and communications with Cheniere staff
- Recording appropriate details of the transactions we have undertaken with you and disclosing the same to relevant regulatory authorities if required
- To comply with our legal and regulatory obligations
- To carry out our "Know your Counter-party" verification checks
- In more unusual circumstances, processing in order to help us to establish, exercise, or defend legal claims (including issues raised with us, through our external whistleblowing hotline)

Security Classification: Unclassified	Page 21 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



If you are based within the European Union, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users for information about the legal bases we rely upon to process your personal data.

If you are based within the European Union, in certain circumstances you have the right to object and can find out more about how and when to do this. See Section 3.29.1 – Legitimate Interests.

### 3.19 How Your Personal Data is Used (Long Form) – LNG Company Data

We use your personal data for the following:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements
- To offer services to you or to obtain support, goods, and services from you
- To comply with our legal and regulatory obligations
- To carry out our "Know your Counter-party" checks
- To carry out research for the purpose of producing analysis and materials for both internal and external use
- In more unusual circumstances, to help us to establish, exercise, or defend legal claims (including issues raised with us, through our external whistleblowing hotline)
- If you are based within the European Union, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users for information about the legal bases we rely upon to process your personal data.
- If you are based within the European Union, in certain circumstances you have the right to object and can find out more about how and when to do this. See Section 3.29.1 – Legitimate Interests.

### 3.20 How Your Personal Data is Used (Long Form) – Job Applicant Data

We generally use job applicant data in the following ways:

- Recruitment activities
- Equal opportunities monitoring
- To help us establish, exercise, or defend legal claims

Security Classification: Unclassified	Page 22 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

- To help us help you and to understand legal obligations if you suffer from a health condition or disability

## 3.20.1 Recruitment Activities

Various ways in which we may use your personal data for this purpose, where appropriate and in accordance with any local laws and requirements are listed below.

**NOTE:** This list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn
  - Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment
  - To facilitate the recruitment process
  - Assessing data about you against vacancies which we think may be suitable for you
  - Enabling you to submit your CV or apply online for jobs
  - Carrying out our obligations arising from any contracts entered into between us
  - Carrying out our obligations arising from any contracts entered into between Cheniere and third parties in relation to your recruitment
  - Facilitating our payroll and invoicing processes
  - Carrying out satisfaction surveys
  - Verifying details you have provided, using third party resources (e.g., psychometric evaluations or skills tests), or to request information (e.g., references, qualifications, and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws)
  - Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties
- If you are based within the European Union, see Section 3.15 - How Your Personal Data is Collected (Long Form) – Website Users for information about the legal bases we rely upon to process your personal data.

Security Classification: Unclassified	Page 23 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



- If you are based within the European Union, in certain circumstances you have the right to object and can find out more about how and when to do this. See Section 3.29.1 – Legitimate Interests.

### 3.20.2 Equal Opportunities Monitoring and Special Categories or Personal Data

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information." This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and only in accordance with local laws and requirements, we will use this information on an anonymized basis to monitor our compliance with equal opportunity requirements.

If you are based within the European Union, see Section 3.29.2 – Consent for more information about how we will conduct these activities in a manner that complies with the GDPR (usually by obtaining your consent).

If you are based within the European Union and you are not happy about this, you have the right to withdraw your consent at any time. See Section 3.28.1 - How can you Access, Amend or Take Back the Personal Data that you have given to us?

### 3.20.3 To Help Us to Establish, Exercise, or Defend Legal Claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise, or defend legal claims (including issues raised with us, through our external whistleblowing hotline).

### 3.20.4 To Help Us to Help You and to Understand Our Legal Obligations (if you suffer from a health condition of disability)

If you suffer from any health conditions or disabilities, we may, subject to local laws and requirements, record details of them so that we can make reasonable adjustments to interview and other recruitment procedures, if required.

## 3.21 How Your Personal Data is Used (Long Form) – Website Users

We use your data to help us to improve your experience of using our website, for example by analyzing your recent job search criteria to help us to present jobs to you that we think you will be interested in.

Security Classification: Unclassified	Page 24 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



# General Privacy Policy



Controlled Document Type: Policy

If you would like to find out more about cookies, including how we use them and what choices are available to you, see Section 3.27 – Cookies.

## 3.22 How do we share your Personal Data?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies
- Individuals and organizations who hold information related to job applicant's reference or application to work with us, such as current, past or prospective employers, educators and examining bodies, and employment and recruitment agencies
- Tax, audit, regulatory bodies, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (e.g., because of a request by a tax authority, in connection with any anticipated litigation or in compliance with our legal and regulatory obligations)
- Third party service providers (including suppliers) who perform functions on our behalf (including administrators, external consultants, business associates, and professional advisers such as lawyers, auditors and accountants, transport and distribution suppliers, technical support functions, and IT consultants carrying out testing and development work on our business technology systems)
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place
- If you are a customer, counter-party trader or LNG company, we may share your personal data with other customers, counter-party traders or LNG companies in the context of a transaction or trading activities involving the other parties
- In the case of job applicants, we may share your personal data with third parties who we have retained to provide services such as reference, qualification, and criminal convictions checks and in relation to immigration requirements, to the extent that these checks are appropriate and in accordance with local laws
- If Cheniere merges with or is acquired by another business or company in the future, we may share your personal data with the new owners of the business or company (and provide you with notice of this disclosure).

Security Classification: Unclassified	Page 25 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



**3.23 How do we safeguard your Personal Data?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorized access. We do this by having in place a range of appropriate technical and organizational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse, loss of, or unauthorized access to your personal information, please let us know immediately. Details of how to contact us can be found in Section 2.0 – Scope.

**3.24 How long do We Keep Your Personal Data?**

We will ordinarily process your data throughout the course of our interactions and will then generally retain it for an appropriate amount of time afterwards. The precise length of time will depend on the type of data, our legitimate business needs, and other legal or regulatory rules that may require us to retain it for certain minimum periods.

We may be required to retain certain data for the purposes of tax reporting or responding to tax queries. In other instances, there may be some other legal, regulatory, or risk management requirements to retain data, including where certain data might be relevant to any potential litigation (bearing in mind relevant limitation periods). For example, if you are a customer, counter-party trader or an LNG company, we will retain records of our phone calls, instant messages, and emails with you for 5 years, in accordance with the Energy and Financial Market Regulations.

In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorized use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory, and risk management obligations, as described above).

Once we have determined that we no longer need to hold your personal data, we will delete it from our systems.

**3.25 Who is Responsible for Processing Your Personal Data and How to Contact Us**

See Section 7.0– Definitions.

The company responsible for compliance with this Privacy Policy is Cheniere Energy Inc., 700 Milam Street, Ste. 1900, Houston, Texas 77002 and its affiliates. Our EU operations are

Security Classification: Unclassified	Page 26 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

based at the following location: Berkeley Square House, Berkeley Square, London W1J 6BY.

If you would like further information about how we handle your personal information, if you have any concerns regarding this Privacy Policy, or if you wish to exercise your legal rights, please write to Cheniere Energy, Inc., at the following address: Cheniere Energy, Inc., Berkeley Square House, Berkeley Square, London W1J 6BY.

## 3.26 How Do We Store and Transfer Your Data Internationally?

In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:

- Between and within entities within our group
- To third parties (such as regulatory authorities, advisers, or other suppliers to the Cheniere business)
- To overseas customers
- To customers within your country who may, in turn, transfer your data internationally
- To a cloud-based storage provider
- To other third parties, as referred in Section 3.22 – How do we share your Personal Data?

If you are based within the European Union, see Section 3.28.1 – How can you Access, Amend, or Take Back the Personal Data that You have given to Us? for more information on how we transfer your data internationally.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

## 3.27 Cookies

### 3.27.1 Cookie Definition

A "cookie" is a piece of information that is stored on your computer's hard drive which records your navigation of a website so that, when you revisit that website, it can present

Security Classification: Unclassified	Page 27 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



tailored options based on the information stored about your last visit. Cookies can also be used to analyze traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

### 3.27.2 How Cookies are used

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.

Cookies are either:

- **Session cookies:** these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer.
- **Persistent cookies:** is stored as a file on your computer and it remains there when you close your web browser. The cookie is read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalization (see below).

Cookies are also categorized as follows:

- **Strictly necessary cookies:** Essential to enable you to use the site effectively and therefore cannot be turned off. Without these cookies, the services available to you on our site cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Performance cookies:** These cookies enable us to monitor and improve the performance of our site. For example, they allow us to count visits, identify traffic sources, and see which parts of the site are most popular.
- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you

Security Classification: Unclassified	Page 28 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



have made to text size, font, and other parts of web pages that you can customize. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymized.

- Personalization cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

Attachment 1: Cookies List lists the cookies we use, why we use them, and it describes the different types of cookies.

### 3.28 EU Residents – Additional Privacy Information

The GDPR requires us to set out certain information that only applies to individuals based within the European Union. We have listed this additional information below. This section of the Privacy Policy will only apply to you if you are based in the European Union.

#### 3.28.1 How can you Access, Amend or Take Back the Personal Data that you have given to us?

If you are based within the European Union, you should be aware that the GDPR offers various protections and clarifies the rights of EU citizens and individuals in the European Union with regard to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To communicate about these rights, please contact us. We will seek to deal with your request without undue delay within one month (subject to any extensions to which we are lawfully entitled).

**NOTE:** We may keep a record of your communications to help us resolve any issues that you raise.

**Right to object:** This enables you to object to us processing your personal data. This is possible for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" category above is most likely to apply. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

Security Classification: Unclassified	Page 29 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

- We can show that we have compelling legitimate grounds for processing which overrides your interests.
- We are processing your data for the establishment, exercise, or defense of a legal claim.

**Right to withdraw consent:** We have obtained your consent to process your personal data. This includes certain activities (e.g., automatic profiling) You may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose. In which case, we will inform you of this condition.

**Data Subject Access Requests (DSAR):** You may ask us to confirm what information we hold about you at any time, and request us to modify, update, or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information that we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive." If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.

**Right to erasure:** You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- The data are no longer necessary for the purpose for which we originally collected and/or processed them.
- Where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing.
- The data has been processed unlawfully (i.e., in a manner which does not comply with the GDPR).
- It is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller.
- If we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

Security Classification: Unclassified	Page 30 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

We would only be entitled to refuse to comply with your request for erasure for one of the following reasons:

- To exercise the right of freedom of expression and information
- To comply with legal obligations or for the performance of a public interest task or exercise of official authority
- For public health reasons in the public interest
- For archival, research, or statistical purposes
- To exercise or defend a legal claim

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

**Right to restrict processing:** You have the right to request that we restrict our processing of your personal data in certain circumstances. We can only continue to store your data, and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise, or defense of legal claims, the protection of the rights of another individual, or reasons of important EU or member state public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data include the following:

- Where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified.
- Where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data.
- Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it
- Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims

Security Classification: Unclassified	Page 31 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



# General Privacy Policy



Controlled Document Type: Policy

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will notify you before lifting any restriction on processing your personal data.

**Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

**Right of data portability:** If you wish, you have the right to transfer your personal data between data controllers. This means that you are able to transfer your Cheniere account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e., without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfill a contract.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority. The supervisory authority in the United Kingdom is the Information Commissioner's Office at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (T: 0303 123 1113 M: casework@ico.org.uk).

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), for details on how to contact us, see Section 2.0 – Scope.

**NOTE:** We may keep a record of your communications to help us resolve any issues that you raise.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

Security Classification: Unclassified	Page 32 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		





### 3.29 Legal Bases for Processing Your Data

The legal bases that we rely on to process the personal data of individuals within the European Union are listed below.

#### 3.29.1 Legitimate Interests

Article 6(1)(f) of the GDPR says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

You have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, see Section 3.28 – EU Residents – Additional Privacy Information.

**Customer Data:** To ensure that we provide you with the best service possible, we use and store your personal data and/or the personal data of individual contacts at your organization as well as reviewing, verifying, and keeping records of our conversations, phone calls, instant messages, emails, meetings, and transactions. We deem these uses of your data to be necessary for our legitimate interests as an organization trading in commodities.

We have to make sure our business runs smoothly. We therefore also need to use your data for our internal administrative activities, such as invoicing where relevant.

We also have to make sure that our business operations are secure. Therefore, we also need to use your data when you visit one of our facilities in order to carry out our security clearance checks.

We also need to protect our business. We therefore need to use the personal data of individuals within your organization in order to verify that you are legally incorporated and solvent.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection or tax collection.

**Supplier Data:** We use and store the personal data of individuals within your organization in order to facilitate the receipt of services from you as one of our suppliers. We also hold your financial details, so that we can pay you for your services.

Security Classification: Unclassified	Page 33 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

We also need to protect our business. We therefore will need to use the personal data of individuals within your organization in order to verify that you are legally incorporated and solvent.

We deem all such activities necessary within the range of our legitimate interests as a recipient of your services.

**Counter-party Trader Data:** We use and store the personal data of individuals within your organization in order to facilitate the receipt of services from you as one of our suppliers. We also hold your financial details, so that we can pay you for your services.

We also need to protect our business. We therefore will need to use the personal data of individuals within your organization in order to verify that you are legally incorporated and solvent.

We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

**LNG Companies:** We use and store the personal data of individuals connected with your organizations in order to facilitate the buying and selling of LNG.

We also review, verify, and keep records of the conversations, phone calls, instant messages, emails, meetings, and transactions we have had to ensure that we provide you with the best service possible.

We deem such activities necessary within the range of our legitimate interests as an organization.

**Job Application Data:** It is reasonable to expect that if you are looking for employment or have provided your CV or application form, or have provided us with your personal data via our electronic recruiting system platform that you approve of us collecting and using your personal data. This includes engaging in a recruitment exercise, considering whether to offer employment to you, and double-checking any information you have given us (e.g., results from psychometric evaluations or skills tests) or to confirm your references, qualifications, and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can carry out and appoint the best applicants to join Cheniere.

## 3.29.2 Consent

If you are based within the European Union, in certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities.

Security Classification: Unclassified	Page 34 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

Article 4(11) of the GDPR states that (opt-in) consent is "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.*" In plain language, this means that:

- You have to give us your consent freely, without us putting you under any type of pressure.
- You have to know what you are consenting to so we will make sure we give you enough information.
- You should have control over which processing activities you consent to and which you do not. We provide these finer controls within our privacy preference center.
- You need to take positive and affirmative action in giving us your consent. We are likely to provide a check box for you to check so that this requirement is met in a clear and unambiguous fashion.
- We will keep records of the consents that you have given in this way.

You have the right to withdraw your consent to these activities. You can do so at any time. See Section 3.28.1 – How can you Access, Amend, or Take Back the Personal Data that you have given to Us?

We also have legal and regulatory obligations that we meet compliance. Article (6)(1)(c) of the GDPR states that we can process your personal data where this processing "*is necessary for compliance with a legal obligation to which [we] are subject.*"

We will process your data where we are required to undertake "Know Your Counterparty" verification checks, "Vendor Setup" checks, and our security clearance checks in order to comply with our legal and regulatory obligations.

If we believe in good faith that it is necessary, we may share your data in connection with crime detection or tax collection.

We also may share your data with regulatory agencies or other relevant bodies in order to comply with our regulatory obligations.

We will keep records of your personal data (including personal data contained in communications and calls) in accordance with our legal and regulatory obligations.

Security Classification: Unclassified	Page 35 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



**3.29.3 Establish, Exercise, or Defend Legal Claims**

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, special categories of personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "*is necessary for the establishment, exercise, or defense of legal claims or whenever courts are acting in their judicial capacity.*"

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

**3.30 Equal Opportunities Monitoring and Special Categories of Personal Data**

We are committed to ensuring that our recruitment processes align with our approach to equal opportunities. Some of the data we may collect about you comes under the umbrella of "diversity information." This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we will use this information on an anonymized basis to monitor our compliance with our equal opportunities policy.

If you are based within the European Union, this information is what is called 'special categories' of personal data (this is also known as sensitive personal data). If you are based within the European Union, we need to obtain your explicit consent before we can collect it. We will ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other special categories of personal data about you, such as health-related information. We may also collect details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying. If you are based within the European Union, we will never do this without your explicit consent.

If you are based within the European Union and would like to find out more about the rules which apply in relation to consent, see Section 3.29.2 – Consent.

If you are based within the European Union and you are not happy about this, you have the right to withdraw your consent at any time. See Section 3.28.1 – How can you Access, Amend, or Take Back the Personal Data that you have given to Us?

Security Classification: Unclassified	Page 36 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		



### 3.31 How do We Store and Transfer Your Data Internationally?

We want to make sure that your data is stored and transferred in a way that is secure. If you are based within the European Union, we will therefore only transfer data outside of the European Economic Area (EEA) (i.e., Member states of the European Union, together with Norway, Iceland, and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data. For example:

- By data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws
- By signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the European Union to entities in the United States of America or any equivalent agreement in respect of other jurisdictions
- Transferring your data to a country where there has been a finding of adequacy by the European Commission in respect to that country's levels of data protection via its legislation
- Where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interest for the purposes of that contract (e.g., if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a customer of ours)
- Where you have consented to the data transfer

## 4.0 Policy Governance

The General Counsel and Corporate Secretary is the owner of this Policy and shall be accountable for ensuring compliance with Records and Information Management & Standards policies. The Company holds all property rights while owners have management accountability.

## 5.0 Recordkeeping

This Policy and all records generated from this Policy shall be managed and retained during their lifecycle according to the *Records and Information Management Policy* and the *Records Retention Schedule*.

## 6.0 References

General Data Protection Regulation

Security Classification: Unclassified	Page 37 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

## 7.0 Definitions

Term	Definition
Customers	Category that covers individual and institutional traders, buyers, and end customers.
Counter-party Traders	Includes traders, brokers, intermediaries (including originators), agents, representatives, derivatives companies, shipping companies, and any other entity involved in or which facilitate Cheniere's trading activities at a transactional level.
Delete	We will attempt to erase (permanently) your personal data once it reaches the end of its retention period or we receive a request from you to do so. Some of your data may still exist within our systems. For example, if it is waiting to be overwritten. For our purposes, this data is put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes, or staff.
Facilities	All facilities under the care, custody, and control of Cheniere.
General Data Protection Regulation (GDPR)	European Union statutory instrument that aims to harmonize European data protection laws. It has an effective date of 25 May 2018, and any references to it should be written accordingly to include any national legislation implementing it.
Job Applicants	Includes applicants for all roles advertised or promoted by Cheniere, including permanent, part-time, and temporary positions (and freelance roles) with Cheniere as well as people who have supplied a speculative CV to Cheniere not in relation to a specific job.
LNG Companies	Includes corporate companies, cooperatives, or sole traders in the LNG industry and those who produce LNG-related products or provide LNG-related services.
Staff	Includes current and former employees and interns engaged directly in the business of Cheniere (or who have accepted an offer to be engaged) as well as other workers currently or previously engaged in the business of providing services to Cheniere (even though they are not classed as employees). Independent contractors and consultants performing services for Cheniere fall within the definition of a 'supplier' for the purposes of this privacy policy.
Suppliers	Refers to partnerships, companies (including sole traders), third party service providers, and atypical workers such as independent contractors and freelance workers, who provide services to Cheniere. For the purposes of this Policy, regulatory agencies and external bodies are treated as suppliers.
Website Users	Any individual who accesses any of the Cheniere websites.



## 8.0 Attachments

- Attachment 1: Cookies List

Security Classification: Unclassified	Page 39 of 40	Uncontrolled When Printed
Owner: Compliance and Ethics	Revision: 0.0	Revision Date: 05/22/2018
Doc No: CORP-CMPETH-GEN-POL-000784		

# General Privacy Policy



Controlled Document Type: Policy

## 8.1 Attachment 1: Cookies List

Cookie Name	Cookie Purpose	Data Collected	How is data shared?	Cookie Duration	Cookie Provider Privacy Policy