

Last updated: 18 October 2023

This privacy notice (hereafter “**Notice**”) defines how **QatarEnergy, formerly Qatar Petroleum**, on behalf of itself, its subsidiaries, and its affiliates (together, “**QatarEnergy**”, “**we**”, “**us**” and “**our**”) processes your personal information (hereafter “**Personal Information**”), and is addressed to individuals with whom we interact, including customers, suppliers, visitors, job applicants, and other users of our Apps and services (together, “**you**”, “**your**”).

A description of QatarEnergy

QatarEnergy is a state-owned energy corporation responsible for the long-term sustainable development, utilization, and monetization of oil and gas resources in the State of Qatar. It covers the full spectrum of the oil and gas value chain, including exploration, production, processing, refining, sales, and delivery.

QatarEnergy is the world’s largest producer of Liquefied Natural Gas (LNG) and also produces a wide range of products for our customers, including liquid fuels, fertilizers, metals, and petrochemical products.

We are committed to protecting and respecting the privacy of each individual’s Personal Information in the normal course of our business. We strive to handle Personal Information legally, securely, efficiently, and effectively as long as it is maintained by us.

This Notice aims to inform you about who we are, how and why we may collect, use, and store your Personal Information in our role as a controller, the permitted reasons, and your rights.

In this Notice, “**Personal Data**” is the information which identifies, or can reasonably be linked directly or indirectly to, an identifiable person. Personal data does not include information that is anonymous, de-identified, or aggregated, as those terms may be defined under applicable law. For purposes of this Notice, “Personal Data” and “Personal Information” have the same meaning and are used interchangeably.

This Notice is being provided in compliance with the principle of transparency, honesty, and respect for human dignity required under the Law No. (13) of 2016 Concerning the Protection of the Privacy of Personal Information, State of Qatar (also called “**PDPPL**”) and the Qatari Bill of Rights and Responsibilities. We only collect, protect and process Personal Information to the extent permitted and we do so in a lawful, fair, and transparent manner for which we are accountable.

QatarEnergy reserves the right to change, modify, add, or remove portions from this Notice from time to time without prior notice to you. Such changes may be made for reasons including, but not limited to, compliance with applicable laws, regulations, our code of conduct, terms and conditions, for technical reasons, requirements imposed by data protection authorities, or changes in our policies and practices regarding the processing of Personal Information.

Your use of our products and services will be governed by the then-current version of this Notice published on our website (<https://qatarenergy.qa>). We therefore encourage you to read this Notice carefully, and regularly check our website to stay informed about any changes or updates.

Your continued use of our website shall constitute your agreement to our use of your Personal Information as specified in this policy. If you have any queries or concerns about our approach that are not already addressed in this Notice, please contact us at privacy@qatarenergy.qa

How does QatarEnergy collect Personal Information

In order for us to provide the products, content, or services you request, or where you are required by law, or under contract, to provide such personal data to us, we may collect and process your personal data. , including in the following manner:

- **When you provide information to us voluntarily** and directly based on the context of your interactions with us, when you use our services, products, and offerings (e.g., an email address you share with us so we may respond to your enquiry).
- **To administer our services and to manage our relationship with you** e.g., when you sign up for an account, in order to process an invoice, for accounting purposes, when you provide or offer to provide services to us.
- **When you use our web pages, apps, and other digital content**, including when you download materials from our resources page.
- **When you sign up** for or attend our events, conferences (in-person or webinars), surveys, or engage with us on social media platforms, or when you visit our premises or contact us.
- **As part of staff interactions** for the maintenance of employment relationship, or when you engage with us, or when you apply for employment internships or scholarships, or as part of employee on-boarding.
- **Content marketing and advertising:** when you participate in our publications, subscriptions, contests, newsletters, memberships, or receive premium content.
- **When you interact with our content, products, services, or ads available on channels and platforms**, we may receive Personal Information about you from the operators of third-party sites (e.g., our vendors and service providers). Such information we receive may include information about the content you viewed or accessed and information about your interests.
- **If you provide us any Personal Information about an individual apart from you, we ask you to prove to our satisfaction that you have the legal authority to represent such person.** Please do not give us information about other individuals unless you are duly authorized or have their express consent to do so.
- **Any other information which you may provide to us.**

We may occasionally display supplemental privacy notices when we believe additional transparency would help you make an informed choice about whether to provide personal data e.g., such a supplemental privacy notice might explain a particular data collection program, or you may see a supplemental privacy notice when registering for an event. Our processing includes both automated and manual methods. In order to build, train, and improve the accuracy of our automated methods of processing, we manually review some of the outcomes produced by such automated methods. The manual reviews are done by assigned QatarEnergy staff on a need-to-know basis or by vendors working on our behalf under confidentiality agreements, where required.

Children's Personal Information

Most of our applications are made for the general public and are designed for adult users. We do not knowingly collect or solicit Personal Information from anyone under the age of 18 years (together, a "child", or a "minor"). If we learn that we have collected Personal Information from a minor, or if your child has provided information to us without your knowledge, we

encourage you to inform us at privacy@gatarenergy.qa and we will take reasonable measures to delete such information from our records and systems as quickly as possible in accordance with our information security protocols and the applicable laws.

Types of Personal Information we may collect

We may process including but not limited to the following categories of Personal Data:

- Personal identifiers such as your name, email address, postal address, telephone number, job title, national identity, family details, photograph, marital status, food preferences, the access records of our premises as recorded by our access logging system and publicly available information from your public social media profile(s) etc.
- Visual, audio, and electronic information, such as your picture or signature; records of our interactions, such as correspondence, details of complaints and their resolutions, service records, your preferred tools, the frequency at which you wish to receive marketing communications.
- Demographic information such as: gender, date of birth or age, nationality, salutation, title and language preferences.
- Professional information, such as your occupation, industry, professional licenses, work experience and employment history, and other qualifications.
- Education information, such as your educational background qualifications and training records.
- Consent details such as: records of consents you may have given with the date and time, means of consent and any other related information (e.g., details of the consent).
- Financial or commercial information, such as details about your subscription plans, the offerings that you have purchased, used and/or expressed interest in, and events you have attended, invoice records, payment details, billing information, bank details, and account information.
- Information that may be deemed sensitive under applicable laws, such as: usernames and passwords used to access your account, government identification numbers, and information regarding children.
- Content and advertising data such as: records of your interactions with our online content including mouse hover, mouse clicks, page interaction information, length of visits, forms you complete (including incomplete forms not submitted), touchscreen interactions and details of content displayed to you.
- Any other Personal Information which you may provide to us.

Creation of Personal Information

We may also collect or automatically generate certain Personal Information about you based on your interactions with us, such as when you use our offerings, and we may associate that information with your account. Such information typically includes:

- **Identifiers**, such as unique user identifiers, unique device identifiers, IP addresses, information about product licenses, and usernames.
- **Geolocation information**, such as region, country, state, Zip code, or postal code.
- Information automatically collected as you browse our website, what pages you have visited, how, for how long, posts, discussions, blogs.
- **Electronic information**, such as information about your browser and device characteristics, operating systems, information relating to automatic updates and technical errors,

information about your use of our offerings, your preferred tools and experiences, and your engagement with our activities, your language preferences, which features you used, etc.

- **Commercial information**, such as records about interest in our offerings or completed purchases.
- **Information that may be deemed sensitive under applicable laws**, such as usernames and passwords used to access your account, and precise geolocation information.
- **Identifying characteristics**, such as facial templates and eye movement.
- **Inferences** such as behaviors, and other attributes drawn from your personal and usage related information available to us.
- **During routine monitoring of our systems and infrastructure**, such as your IP address, addresses from network packets, and other technical information collected in order to maintain the security and performance of our systems and in order to protect against loss, damage, modification, disclosure, illegal or incidental access or misuse.

Permitted reasons for processing

We rely on one or more of the following legal bases to maintain and process your Personal Information:

- **Consent:** Where you have given us permission for defined purposes and in accordance with PDPPL. You can withdraw your consent at any time (subject to conditions) by contacting us at the details mentioned in the "Contact Us" section below
- **Contractual obligations:** Where processing Personal Data is necessary to fulfill our contractual obligations, including providing our services to you or prior to entering into a contract with you.
- **Legal obligations:** Where it is necessary for compliance with our legal obligations, cooperate with law enforcement bodies or regulatory agencies, establish, exercise, or defend our legal rights, or disclose your information as evidence in litigation etc.
- **Legitimate interest:** When we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests, rights and freedoms under data protection and any other relevant law, to administer our websites, our events, and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes to further improve/enhance our services.

Where we rely on our legitimate interests to process your Personal Information, we balance your rights against ours so that our interest is not overridden by the interests you have to protect your Personal Information.

We process your Personal Information for limited purposes, depending on how you interact with our Services, such as:

- **To validate your identity as necessary to perform our contract with you.**
- **To facilitate account creation, authentication and otherwise manage user accounts** to setup your user account, keep your account in working order, to enforce our terms of use and service.
- **To deliver services, products, and other offerings**, including information such as insights and recommendations, as necessary to fulfill our contractual obligations. For example, we may analyze usage information for billing or discount purposes.

- **To offer support** to manage your use of our services, respond to your inquiries, comments and feedback, to provide customer service and support to solve issues you might have with your requested service for example, a phone call from us in response to your query.
- **To communicate with you** to send you technical alerts, changes in our terms and conditions, security notifications, notify you about our products and services, confirmation of your registration, transaction confirmations and invoices.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, supplies and equipment, sales, and vendor management through the services.
- **To send you marketing and promotional communications.** We may process your Personal Information to offer you additional QatarEnergy or third-party products, content or services that may be of interest to you; and to deliver any third party sponsored content or services that you may request.
- **To identify usage trends.** We may process information for auditing, trend analysis and research in order to improve our products, content, and services based on better informed decisions.
- **To save or protect an individual's vital interest.** We may process your information if necessary to save or protect an individual's life and to prevent harm to others.
- **To protect our rights, safety and property** where authorized by law or where it is necessary to comply with a valid legal process.
- **For our legitimate business purposes** such as data analytics, prevent fraud, administrative purposes, network and information security, and improve performance of our business.

Sharing of the Personal Information with third parties

In order to assist in delivering the purposes enlisted above and in accordance with applicable law, we may receive from and disclose Personal Information to our vendors, affiliates, service providers, contractors, sponsors, employers, business partners, business contact databases, channel partners (for example, resellers), marketing service providers, third-party data aggregators, and social networking services and platforms (for example, LinkedIn and Facebook), attorneys, tribunals, or law enforcement authorities (together, "**third parties**") -- under contracts governing the disclosure and/or processing of information. We also process Personal Data on behalf of our customers subject to a written contract. We however do not control and are not responsible for the data processing or protection practices of our customers, which may differ from those set out in this Notice.

Third parties are responsible for:

- Deploying appropriate measures to protect the personal data which they process for us/on our behalf and based on transfer risk assessments.
- Complying with our formal instructions for the processing of Personal Information.
- Informing us as soon as possible after they become aware of any breach of the PDPPL; or if a breach of their deployed security measures occurs; or when threats arise to the Personal Data which they process for either for us or on our behalf.

We may disclose your Personal Information with third parties where your consent is given to us to do so.

We reserve the right to disclose any Personal Information belonging to you or your use of our products services and systems to third parties without your prior permission where doing so is necessary to:

- comply with applicable law, regulations, legal process, or governmental requests
- comply with governmental orders, court orders, or legal proceedings served on us

- protect us in connection with any alleged violations of our terms of use and service or other alleged contract violations
- protect our rights, privacy, safety, or property, and/or that of our affiliates, other users, or the public
- to exchange any required information related to fraud prevention and credit risk protection
- respond to claims of suspected or actual illegal activity and/or other harmful conduct
- respond to an audit or investigation of a complaint or security threat
- enforce our terms and conditions
- protect our operations or those of any of our affiliates
- permit us to pursue available remedies or limit the damages that we may sustain

We may share or transfer your information in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock including, without limitation, in connection with bankruptcy or similar proceedings

International transfers of Personal Information

QatarEnergy operates globally. Therefore, your Personal Information may be accessed by our staff, affiliates, or suppliers in, transferred to, and/or stored at, a destination outside the country in which you are located for the purposes set out in this Notice.

How we protect your Personal Information

We put in place reasonable and appropriate physical, organizational, administrative, and technological procedures and controls to implement the data privacy principles, safeguard individuals' rights, and to protect your data from unauthorized access, use, loss, alteration, destruction, modification or other malicious actions, in line with the principles of data privacy by design and by default.

For ensuring network security and provide consistent service for all users, we employ software programs to monitor network traffic, identify unauthorized access or access to information, detect computer viruses and other software that might damage our systems and/or network, and monitor and fine-tune the performance of our services, systems, and network.

Security and confidentiality of information cannot be guaranteed. Hence despite our utmost efforts to protect your Personal Information, QatarEnergy does not warrant to you or make any representation to you that can be relied on that the security of any information you transmit to us through our online services is guaranteed. Such transmission of Personal Information is done at your own risk.

We process the information in accordance with the provisions and principles of the PDPPL by deploying appropriate technical and organizational measures based on established frameworks such as the Qatar National Information Assurance Policy (NIA) and other relevant security standards and industry best practices.

Will inform as soon as practically possible if we become aware of a privacy breach in respect of your Personal Information in accordance with the PDPPL. We:

- Verify third parties' (processor) compliance with the PDPPL when processing Personal Data for us or on our behalf under legally binding contracts.
- Conduct due diligence (and audit/review) of processors in order to assess if they:

- Deploy and maintain strong controls across their products, systems, and services and commensurate with the nature and importance of personal data which are equivalent to ours
- Strive towards sufficiently mitigate any risks of serious damage to individuals
- Are able to ensure the ongoing confidentiality, integrity, availability, resilience and restoration of the processing systems and services
- Have deployed mechanisms to protect the rights of individuals under the PDPPL
- Notify us as soon as possible after they become aware of one of the following events:
 - they suffer a breach that results in the loss, damage, modification, disclosure and/or illegal/inadvertent access or use of personal data
 - they find that their security measures have been compromised or
 - a risk of threat arises to personal data that they are processing or/on our behalf

If you suspect your interaction with us is no longer secure or the security of your account with us has been compromised, please notify us as per "Contact Us" section below (note that if you choose to notify us via physical mail, this might delay the time it takes for us to respond to your problem).

Data accuracy

We take reasonable steps in order to ensure that:

- your Personal Information that we process is accurate, complete, and kept up to date where necessary; and
- we take reasonable steps to delete or correct personal data that is incorrect with regard to the purposes for which it is processed.

We therefore request you to ensure that all Personal Information that you provide to us is true, complete, and accurate, and notify us of any changes to such Personal Information.

Data minimisation

We, as controller do not collect and process Personal Data beyond the extent required and unless doing so is necessary to fulfil the purpose defined in this Notice. Processing of Personal Information will be performed in a way which is compatible with the purpose for which such collection or processing is necessary.

Storage and Retention Practices

We do not keep any Personal Data for a period of time that exceeds the reasonably necessary period for achieving the purposes for which we collect or process it, or in accordance with the following:

- a) **Until we have an ongoing relationship with you** (for example where you are a user of our services, or you are included in our mailing list and have not unsubscribed).
- b) For as long as **your Personal Information is necessary for the processing purpose(s)** for which it was collected and any other permitted linked purpose, or for our legitimate interests or where we have valid and continuing legal basis (e.g., as per contractually defined retention duration, for network improvement, for fraud prevention, for record-keeping, or enforcing our legal rights).
- c) Where **you have given consent** to retain your personal data for an indefinite period of time.
- d) **For the duration of limitation period under applicable law**

- e) **If any relevant legal claims are brought**, either by governmental authorities and/or customers, we may continue to retain and process your Personal Information for such additional periods as necessary in connection with such claim.
- f) In accordance with **QatarEnergy data retention guidelines and/or standards**.

After the retention period is over, we take reasonable steps necessary to delete, pseudonymize or anonymize Personal Information. There may be occasions where we are unable to fully delete, anonymize or de-identify your personal data due to technical, legal, regulatory compliance or other operational reasons.

Personal Information may be stored on our, or our third-party service providers' servers and used under contracts with you for example, certain services might require your Personal Information to be held in cloud infrastructure managed by third-party service providers with whom we engage to fulfill your requirements. Such processors will be subject to binding contractual obligations to:

- (i) only process Personal Information in accordance with our formal instructions; and
- (ii) use at least the same level of security that we use to protect your Personal Information; together with any additional requirements under applicable law.

Your Privacy rights

To the extent permitted under applicable law, and subject to conditions, you can exercise:

1. The right to protection and lawful processing of your relevant Personal Information
2. The right to request rectification/correction.
3. The right to be informed about the collection and use of your personal data upon request.
4. The right to be notified when a third party has been given inaccurate information about your personal data (inaccurate disclosure).
5. The right to request access to review, or request copies of your Personal Information by raising a "Subject Access Request".
6. The right to withdraw previously given consent to processing. However, such withdrawal does not affect the lawfulness of any processing done prior to the date on which we receive notice of consent withdrawal, and does not prevent the Processing of your Personal Information where it is based on any other legal basis.
7. The right to object to our processing some or all of your Personal Information specifying the reason of objection. However, we may not be able to provide you with the full benefit of our products and services if you do not provide us with your requested information – for example , we may not be able to such things depending on the context in which you have provided your Personal Information to us such as processing your orders or offer you employment etc.
8. The right to erasure or to be "forgotten".

In order to exercise your rights, please email us at privacy@qatarenergy.qa

We will consider and act upon any reasonable request in accordance with our defined processes for handling such requests. We reserve the right to charge a small fee and may require proof of your identity before we can give effect to your rights. Your rights may be limited in some circumstances by applicable law. For example, even if you ask us to delete your personal information, we may need to retain it to complete transactions you have requested, to comply with our legal obligations, or for other limited business purposes as required or permitted under applicable law.

Where we process Personal Data on behalf of our customers, we may refer a request to the relevant customer and use reasonable efforts to cooperate with their handling of the request, subject to any special contractual arrangements with the relevant customer.

Cookies and similar technologies

We use cookies (small text files stored by web browsers when websites are visited) and related technologies, such as pixels and beacons (collectively “**Cookies**”), to collect and store information when you use our applications. Cookies are deployed only after you “opt-in” to Cookie settings on your browser. You can accept or decline Cookies by modifying the settings in your browser. Please bear in mind however, that you may not be able to use all the features of our site if Cookies are disabled. In order to learn more, please see our [Cookie Policy](#)

Marketing

We may send advertising or marketing material to promote our products and additional services, promotions and special offers that may be of interest to you, using the contact details that you have provided to us and in compliance with the PDPPL.

We will not disclose or sell your Personal Data except in circumstances where we are acting in good faith and where applicable law require us do so or in order to protect the rights and property of QatarEnergy. All Personal Information voluntarily disclosed to us is at the risk of the user and we shall not be liable under any circumstances for any misuse of such voluntarily disclosed Personal Information.

However, if you opt out of receiving our marketing communication, we may still send you service-related messages necessary for the administration and use of your account, to respond to your service requests, inform you with the information about our services which you are using or have used, and inform you about the changes to our terms and conditions.

Account Information

Upon your request to terminate your account with us, we will deactivate or delete your account and information from our active databases. However, we may retain some Personal Information in our files to prevent fraud, troubleshoot problems, to assist with any investigations, to enforce our legal rights and obligations.

Links to other websites

For your convenience, our web pages, apps, and electronic communication may contain links to and/from other websites not affiliated with QatarEnergy. This is because we might be engaging the services of third-party platforms for example, for advertising, plugins, or content hosting.

The inclusion of a link on the site does not imply endorsement of the linked site or any of their content by us.

We encourage our users to be aware when they leave our site and enter other sites and to read the privacy statements, terms of use, and practices to determine how they will handle any information they collect from you. We are not responsible for the content or privacy practices of linked websites or their use. This privacy statement applies solely to the information collected by our website.

Contact us

If you have any questions, concerns, suggestions about this Notice, or if you want more details about how we use your personal data, you can email us at privacy@qatarenergy.qa

Your right to lodge a complaint

We are committed to working with you to resolve your concern around the processing of your Personal Information by us or being done on our behalf. If you have any concerns about the treatment of your Personal Information by QatarEnergy, please contact us at privacy@qatarenergy.qa and provide sufficient details about your concern for us to appropriately consider the matter.

If, you feel your request has not been handled by us in a reasonable manner, or if you are not satisfied with how your rights are being managed in accordance with the PDPPL, you may make a complaint to the 'National Cyber Governance and Assurance Affairs' department in the National Cyber Security Agency (NCSA) or to a competent supervisory authority in the jurisdiction in which the alleged infringement took place, or in which you work or habitually reside.

Dispute resolution

In the event of a conflict between this Notice and the terms of any agreement(s) with you, the terms of those agreement(s) will override. Any dispute concerning the use of our products and services (including our use of your Personal Information) will be governed by the applicable laws of the State of Qatar.