# ANNEX 1 to the Data Processing Agreement for Kabal Onshore

## REVISION LOG

| Rev. | Date | Nature of Changes |
|---|---|---|
| 1.0 | 01.04.2018 | Created document |
| 1.1 | 19.03.2019 | Refactored the list of categories and personal data description |
| 1.2 | 24.11.2020 | Updated Section for Locations with GDPR info |
| 1.3 | 17.11.2021 | |
| 1.4 | 25.01.2023 | Changing Kayako with ServiceNow |
| 1.5 | 20.10.2023 | Removed UUID from the list of data categories |
| 1.6 | 26.10.2023 | Added Malaysia as office location |
| 1.7 | 06.01.2025 | Added Singapore as AWS location for Malaysian customers |
| 1.8 | 20.01.2026 | Added Digital Signatures as a data category for manifest customization. |
| 1.9 | 12.03.2026 | Updated Section 1 to clarify Controller`s notification obligations for indirect data collection |
| 2.0 | 02.06.2026 | Updated Section 1 to authorize automated integration and cross-platform synchronization |
| 2.1 | 31.07.2026 | Updated Section 1 to include Zendesk, next of kin as data subject, categories of personal data and locations updated |
| 2.2 | 02.10.2026 | Updated Section 4 to include GitHub as data processor |
| 2.3 | 05.11.2026 | Updated Section 4 to remove ServiceNow as data processor |

## 1. PURPOSE AND NATURE OF THE PROCESSING OPERATIONS

The Controller will

1) provide the Processor own information,
2) provide the Processor lawfully obtained information about Controller's other contractors / suppliers, ensuring all necessary notices have been provided to the data subject as required by applicable law,
3) provide its other contractors / suppliers ¨with access to the software system covered by the Main Agreement, and
4) make sure such other contractors / suppliers are secured the rights and obligations equal to Controller under this Data Protection Agreement and have provided required information to their personnel with regard to Processing of Personal Data belonging to such other contractors / suppliers, in order to handle and execute its logistical operations.
5) authorize and instruct the Processor to conduct automated synchronization, transfer, and integration of Personal Data between the Controller's Kabal environment and other platforms within the Kabal product suite (including, without limitation, Kabal Offshore, Kabal Personnel, Kabal Onshore, Kabal Field Services, Kabal Supplier and Kabal Base) as well as authorized external third-party registries or platforms, provided that such integration has been enabled or requested by the Controller at a company or systemic level.

## 2. CATEGORIES OF DATA SUBJECTS

The Processor may Process Personal Data on the following categories of Data Subjects:

| Data Subjects | Control and limitations |
|---|---|
| **Controller's employees and consultants** | Controller's super user will approve/reject user request and regulate access privileges by assigning application roles to the users. |
| **Controller's contractors and subcontractors** | Controller's super user will approve/reject user request and regulate access privileges by assigning application roles to the users. |
| **Controller's data processor** | Limited to Kabal employees providing services according to contract. |
| **Next of kin / emergency contacts** | Provided by the Controller`s users and limited to contact details processed for emergency-contact purposes. The Controller ensures that the required information has been given to these individuals in accordance with GDPR Art. 14. |

## 3. CATEGORIES OF PERSONAL DATA

The Personal Data processed on behalf of the Controller concerns the following categories of data. Except online tracking data, all data is collected and submitted by the Controller or the end-user.

| Categories | Description | Purpose |
|---|---|---|
| **System Data** | e.g username, password, audit logs | Security |
| **Contact data** | e.g name, company, address, phone number, email, work description, next of kin. | Contact information provided to the end-users in the application to support the work-flows. |
| **User unique data** | e.g passport number, course certificates, day of birth, unique employee IDs in 3rd party systems that Controller chooses to integrate. | Supplementary data to assist Controllers superuser to provide the user with appropriate access privileges and validate mandatory documentation when assigning jobs to employees. |
| **Online Tracking Data** | e.g cookies, IP address, domain name | To improve the usability, accessibility, and website performance for Controllers benefit, and to support Kabal`s security monitoring, including screening source IP addresses against threat-intelligence sources to help detect and prevent unauthorised access. IP address is used to derive approximate geolocation for these purposes only |
| **Biometric data** | e.g special categories such as | Mandatory if Controller chooses to use the functionality of booking personnel |
| **Digital Signature Image** | User defined image files (e.g., PNG/JPG) uploaded by user to represent their signature or authorization mark. | To facilitate storage and automated insertion of the signature image onto cargo manifest and custom documents (PDF/XLSX) to facilitate operational efficiency for signed documentation. |
| **Personal Details** | e.g gender | Mandatory if Controller chooses to use the functionality of booking personnel |
| **Health Data** | e.g weight | Mandatory if Controller chooses to use the functionality of booking personnel |

## 4. LOCATION(S), INCLUDING NAME OF COUNTRY/COUNTRIES OF PROCESSING

| Company | Country of processing | Nature of processing | Additional Information |
|---|---|---|---|
| **Kabal** | Norway, USA and Malaysia | To support the system and provide system support. | GDPR compliant. EU Standard Contractual Clauses (SCC) in place and TIA performed.<br><br>Data processing is governed by Kabal`s DPA including SCC. |
| **Amazon AWS** | Ireland (production) and Germany (test and failover)<br><br>*Malaysian customers: Singapore (production, test and failover)* | Hosting of the system. | GDPR Compliant. EU Standard Contractual Clauses (SCC) in place and TIA performed.<br>https://aws.amazon.com/premiumsupport/knowledge-center/gdpr-compliance/ |
| **Twilio SendGrid** | USA | Email communication between the system and the user. | GDPR Compliant.EU-US Data Privacy Framework (DPF) and EU Standard Contractual Clauses (SCC) in place and TIA performed.<br>https://www.twilio.com/legal/data-protection-addendum |
| **Splunk** | Germany | Logging of requests to the application. | GDPR compliant<br>https://www.splunk.com/en_us/about-splunk/splunk-data-security-and-privacy/data-privacy-at-splunk.html |
| **Zendesk** | EEA: Ireland (production) and Germany (failover) | Handling of support requests | GDPR Compliant.<br>Resold and implemented by Kundelab AS (Norway) under Zendesk Reseller Customer Agreement, governed by Zendesk DPA incorporating the EU SCC.<br>https://www.zendesk.com/company/data-processing-agreement/ |
| **GitHub** | USA | AI assisted operational data analysis. | GDPR Compliant. EU Standard Contractual Clauses (Scc) in place and TIA performed.<br>https://github.com/customer-terms/github-data-protection-agreement |

## 5. DURATION OF THE PROCESSING

The Processor processes the Personal Data for the term of the governing main agreement. On termination, the personal data are returned or deleted in accordance with the governing Data Processing Agreement.