ANNEX to the Data Processing Agreement for Personnel functionality

REVISION LOG

Rev.	Date	Nature of Changes
1.0	17.01.2025	Created document
1.1	20.01.2026	Added Functional Software, Inc. (Sentry) and Splunk as sub-processor and updated data categories for diagnostic purposes.
1.2	12.03.2026	Updated Section 1 to clarify Controller`s notification obligations for indirect data collection
1.3	02.06.2026	Updated Section 1 to authorize automated integration and cross-platform synchronization
1.4	31.07.2026	Updated Section 4 to include Zendesk, next of kin as data subject and categories of personal data and locations updated

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, and 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 Trackit Energy 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
Medical Data	e.g medical certificates, notes about medical conditions, medivac reports, weight	For health screening and collection of injury/death information for system reporting.
Qualification Data	e.g induction information, industry qualifications	For pre-screening qualification readiness status.
Diagnostic & Technical Data	e.g. IP addresses, browser/device metadata	To identify, diagnose, and resolve software bugs and performance issues to ensure system stability.
Personal Details	e.g gender	Mandatory for 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. Data processing is governed by Kabal`s DPA including SCC.
Trackit Energy	Malaysia	To support the system and provide system support.	GDPR Compliant. EU Standard Contractual Clauses (SCC) in place and TIA performed. Data processing is governed by Kabal`s DPA including SCC.
Twilio SendGrid	USA	Email communication between the system and the user including SMS notification and communication.	GDPR Compliant. EU-US Data Privacy Framework (DPF) and EU Standard Contractual Clauses (SCC) in place and TIA performed. https://www.twilio.com/legal/data-protection-addendum
Microsoft Azure	Singapore, USA	Hosting	GDPR Compliant. EU Standard Contractual Clauses (SCC) in place and TIA performed. https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA
Exabytes	Malaysia, Singapore	SMS communications in Malaysia only	Used solely for SMS to Malaysia-based customers. Data is stored and processed in Malaysia/Singapore and does not pass through the EEA. No Chapter V transfer arises (EDPB Guidelines 05/2021). https://www.exabytes.my/legal/privacy
Functional Software, Inc. (Sentry)	USA	Application monitoring and error tracking services to identify and resolve software issues.	GDPR Compliant. EU-US Data Privacy Framework (DPF) and EU Standard Contractual Clauses (SCC) in place and TIA performed. . Data scrubbing enabled; no special-category data to be transmitted per Sentry DPA. https://docs.sentry.io/security-legal-pii/security/terms/
Splunk	Germany	Logging of requests to the application	GDPR compliant. 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. Resold and implemented by Kundelab AS (Norway) under Zendesk Reseller Customer Agreement, governed by Zendesk DPA incorporating the EU SCC. 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. 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.