

	PRIVACY POLICY	Version: 5	Date: 04/30/2018
		Effective Date:	04/30/2018
		Last Reviewed:	04/30/2018

1. Introduction

This policy applies to personal information that is processed by Noble Energy, including personal information collected through your online and off-line interactions with Noble Energy. However, this policy does not apply to personal information that originates from member states of the European Union about job applicants or about employees and independent contractors. Noble Energy’s processing of job applicants’ personal information that originates from member states of the European Union is governed by Noble Energy’s EU Job Applicant Data Privacy Policy. Noble Energy’s processing of employees’ and independent contractors’ personal information that originates from member states of the European Union about is governed by Noble Energy’s EU HR Data Privacy Policy.

Noble Energy is an international business headquartered in the United States of America. Noble Energy’s business operations cross borders. For example, some of Noble Energy’s information technology systems and databases that are physically installed in the United States of America are shared between offices located in the United States of America and elsewhere in the world. This means personal information may be processed in any country where Noble Energy maintains facilities.

Your provision of personal information to Noble Energy confirms your informed consent for the Company to process that information as provided for in this policy. Your disclosure of personal information to Noble Energy is voluntary; however, refusal to provide any personal information may disadvantage you in your interactions with Noble Energy.

2. Definitions

As used in this policy:


2.1 “Noble Energy”, the “Company” and “we”

“Noble Energy”, the “Company” and “we” refers to Noble Energy, Inc. and its controlled subsidiaries and affiliates.

2.2 “You”

“You” and its derivatives refers to each person that interacts with Noble Energy, such as customers, interest holders, service providers and suppliers, but does not include job applicants, employees or independent contractors.

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	PRIVACY POLICY	Version: 5	Date: 04/30/2018
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		Last Reviewed:	04/30/2018

2.3 “Personal information” and “personal data”

“Personal information” and “personal data” is any information, in any form, about an identified or identifiable person.

2.4 “Identifiable person”

An “identifiable person” is one who can be identified using an identification number or any factors specific to that person’s physical, physiological, mental, economic, cultural or social identity.

2.5 “Sensitive information”

“Sensitive information” is personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or the sexual orientation of a person. Sensitive information includes any personal information received from a third party where the third party identifies and treats it as sensitive.

2.6 “Process” and “processing”

“Process” and “processing” means any manual or automatic operation on personal information, such as its collection, recording, organization, storage, modification, retrieval, access, use, disclosure or dissemination, erasure or destruction.

3. Personal Information We Collect

Noble Energy may collect, or you may choose to provide, personal information in connection with your transactions and other direct interactions with the Company. That personal information may include, but is not limited to, your name, your address(es) (e.g. your company and/or home address, both physical and electronic), your telephone number(s) (e.g. your work, cell phone and/or home number), your company affiliation and associated interests, your personal identification numbers (e.g. your driver’s license number), your bank account, tax and other financial details, and your image (e.g. via photographs or videotapes of you if you visit our offices).

Noble Energy may also automatically collect non-personal information through your interaction and use of the Company’s websites. This information may include, but is not limited to, browser and device information, data collected through

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	PRIVACY POLICY	Version: 5	Date: 04/30/2018
		Effective Date:	04/30/2018
		Last Reviewed:	04/30/2018

automated electronic interactions, application usage data, demographic information, geographic or geo-location information, statistical and aggregated information. Statistical or aggregated information does not directly identify a specific person, but it may be derived from personal information. For example, we may aggregate personal information to calculate the percentage of users in a particular country or region. If and to the extent that such non-personal or aggregated data is capable of directly identifying you or is otherwise deemed personal information under applicable law, we will treat such information as your personal information.

Noble Energy does not request or require your sensitive information. Please do not provide us with your sensitive information. If you do, you acknowledge that your attention was specifically drawn to this section of this policy and to any specific notice provided when you disclose such information, and your provision of sensitive information confirms your informed consent that the Company may process such sensitive information in the ways described in this policy and in the ways described in any notice provided when you disclose such information.

Noble Energy does not knowingly collect personal information from minors. If you are a minor, please do not access or use our websites, and please do not provide us with any of your personal information. If you believe that we have mistakenly or unintentionally collected personal information of a minor without appropriate consent, please contact Noble Energy’s 24-hour Help Line (+1-866-311-4219). The Company will then make a reasonable effort to remove the information from our records and make any other necessary corrections.


4. How We Collect Personal Information

Noble Energy collects your personal information in the following ways:

- 1) Direct interactions where you knowingly provide personal information to Noble Energy, such as from your on-line and off-line interactions with Noble Energy, submission of electronic communications and forms, and transactions for goods, services and royalties.
- 2) Technology utilized on our websites that automatically logs data about your visit(s), which may include cookies.

Noble Energy uses the term “cookies” to refer to any information that our websites may send and subsequently be stored on your computer or device. Some of the cookies we use may be “session cookies” which are deleted

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	PRIVACY POLICY	Version: 5	Date: 04/30/2018
		Effective Date:	04/30/2018
		Last Reviewed:	04/30/2018

when you close your browser, and others may be “persistent cookies” which remain on your computer or device for a longer period of time.

Noble Energy uses cookies to log data about your visit(s) to our websites, data which the Company uses to enhance the performance of its websites and increase their functionality. Noble Energy does not use cookies to identify you, transmit targeted advertising or monitor your activities on the Internet. By using Noble Energy’s websites, you acknowledge that your attention was specifically drawn to this section of this policy and to any cookie-specific user notice given to you, and your use confirms your informed consent to Noble Energy’s use of cookies for these purposes. If you do not so consent, please discontinue use of our websites.

Your browser may provide you with information and control over cookies. You may set your browser to alert you when a cookie is being used, and accept or reject the cookie. You may also set your browser to refuse all cookies or accept only cookies returned to the originating servers. If you reject or refuse cookies, some of the functions of our websites may not work properly. For further information about cookies, please visit www.allaboutcookies.org.


5. How We Use Personal Information

Noble Energy processes your personal information in order to communicate with you, to engage in, fulfill and complete transactions with you, to provide you with goods or services, to administer and otherwise fulfill our obligations in relation to any contract you have with us, for statistical purposes, to help us design and administer our websites, to protect our employees, sites, facilities, property and operations, and for compliance with corporate governance and legal and regulatory requirements.

6. Notice and Choice

Personal information may be processed only for the purposes described in this policy and any additional notices provided by Noble Energy. Such additional notices are provided when you are initially asked to provide any type of personal information to Noble Energy that is not described in this policy (or as soon thereafter as practicable), and before the Company discloses your personal information to a third party or uses your personal information for a purpose other

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	PRIVACY POLICY	Version: 5 Date: 04/30/2018
		Effective Date: 04/30/2018
		Last Reviewed: 04/30/2018

than that for which it was originally collected (in each case other than as provided in this policy).


7. Disclosures

Noble Energy may disclose your personal data for processing by Noble Energy, Inc.’s controlled subsidiaries and affiliates, and for processing by third parties that are performing tasks on behalf of the Company. Such third parties may include our third-party service providers, such as information technology services, website hosting services, payroll services, employee benefit services, such as health or retirement benefits, auditing services, consultancy services, regulatory services, and legal services. Noble Energy may disclose your personal data to a third party to engage in the business of Noble Energy, to provide services to you, to facilitate the recruitment process and employment relationship, and to respond to your questions, comments, or complaints. In addition, Noble Energy may use and disclose your personal information when we believe that disclosure is necessary to protect the Company’s rights, when required by government or judicial order, law or regulation, or to respond to legal process, such as to meet national security or law enforcement requirements. We may distribute certain of your personal data to third parties for the purpose of allowing them to market their goods and services to you. We will notify you at the time we collect such data if it will be disclosed for such purpose. We may also supply third parties with non-personal or aggregated data that is not capable of identifying you or any other person for uses by third parties in connection with goods and services they provide. Noble Energy does not sell personal information to third parties for the purpose of allowing them to market their goods and services to you.

8. Onward Transfer

Cross-border transfers of personal information will be conducted in accordance with the laws of the countries where it is collected. Noble Energy will not transfer your personal information to a third party in the United States of America that is performing tasks on behalf of Noble Energy unless the third party has entered into an agreement with the Company requiring the third party to maintain the confidentiality and security of personal information they receive, to process it only as necessary to provide services for Noble Energy, and to process it consistent with the Company’s obligations under the Principles of the EU-US Privacy Shield Framework. Noble Energy remains responsible and liable under the Principles of the EU-US Privacy Shield Framework if a third party that it engages to process personal information on its behalf in the United States of America does so in a manner inconsistent with the Principles of the EU-US Privacy Shield Framework,

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	PRIVACY POLICY	Version: 5	Date: 04/30/2018
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		Last Reviewed:	04/30/2018

unless Noble Energy proves that it is not responsible for the event giving rise to the damage.

9. Security

Noble Energy will take reasonable administrative, technical and physical precautions that are designed to protect personal information in Noble Energy’s possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. However, we cannot ensure or warrant the security of any personal information you provide.

10. Data Integrity and Purpose Limitation


Noble Energy only processes your personal information for the purposes described in this policy. The Company will not process your personal information in a way that is incompatible with this policy or subsequently authorized by you. You are responsible for the personal information you provide to Noble Energy, and you must ensure that it is complete and accurate. You must also ensure that if you provide any information concerning any other person, you have the right to provide such information to Noble Energy and that the Company has the right to use such information as described in this policy. Noble Energy may retain your personal information for such period of time as required by contract or law, or for such period of time as the Company considers necessary for the purposes described in this policy. To the extent permitted or required by contract or law, Noble Energy may delete your personal information at any time.

11. Access

If at any time you wish for us to stop using your personal information for any purpose, you wish for us to stop sharing your personal information with third parties, you wish for us to remove your personal information from our records, or you would like to review, correct or amend the personal information we collect about you, please contact Noble Energy’s Noble Talks via the 24-hour Help Line (+1-866-311-4219) or website (NobleTalk.EthicsPoint.com). We will make a reasonable effort to accommodate your request as soon as it is reasonably possible to do so, except for those circumstances where we are not required to accommodate your request, such as where:

- 1) the burden or expense of fulfilling your request would be disproportionate to the risks to your privacy in the case in question;

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	PRIVACY POLICY	Version: 5	Date: 04/30/2018
		Effective Date:	04/30/2018
		Last Reviewed:	04/30/2018

- 2) the legitimate rights or important interests of persons other than you would be violated by fulfilling your request;
- 3) fulfilling your request is likely to interfere with the safeguarding of important countervailing public interests, such as national security, defense, or public security;
- 4) fulfilling your request is likely to violate any applicable law, regulation, rule or order of a governmental or judicial authority;
- 5) fulfilling your request would interfere with the prevention, investigation or detection of offenses or the right to a fair trial;
- 6) fulfilling your request would breach a legal or other professional privilege or obligation;
- 7) fulfilling your request would prejudice employee security investigations or grievance proceedings or in connection with employee succession planning and corporate re-organizations; or
- 8) fulfilling your request would prejudice the confidentiality necessary in monitoring, inspection or regulatory functions connected with sound management, or in future or ongoing negotiations involving Noble Energy.
- 9) the third party with which the personal information is shared is acting as our agent and performing a task on our behalf.

12. Recourse Generally

Noble Energy encourages you to contact us should you have a privacy-related question or concern. Please contact Noble Energy's Noble Talks via the 24-hour Help Line (+1-866-311-4219) or website (NobleTalk.EthicsPoint.com).

13 Recourse for EU Personal Data

For any privacy-related complaints regarding personal data originating from member states of the European Union that cannot be resolved with Noble Energy directly, the Company has chosen to cooperate with European Union data protection authorities and comply with the information and advice provided to it by

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	PRIVACY POLICY	Version: 5	Date: 04/30/2018
		Effective Date:	04/30/2018
		Last Reviewed:	04/30/2018

an informal panel of the data protection authorities in relation to such unresolved complaints (as further described in the Principles of the EU-US Privacy Shield Framework). Please contact the data protection authority for the jurisdiction in which you live.

Contact details for the data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. You may also contact us to be directed to the relevant data protection authority.

The above recourse mechanisms are available to you at no cost. As a last resort, privacy-related complaints regarding personal data originating from member states of the European Union that remain unresolved after pursuing these channels may be subject to binding arbitration. Additional information is available at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

14. Enforcement and Liability


Noble Energy is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. Noble Energy will cooperate, as applicable, with the appropriate European data protection authorities, the U.S. Department of Commerce, the U.S. Federal Trade Commission, relevant state or provincial agencies, and law enforcement and judicial authorities in investigating any privacy-related complaints or suspected violations of privacy laws or this policy, as well as in rectifying any noncompliant practices and complying with any advice that may be given by the European Union data protection authorities.

15. EU-US Privacy Shield Framework

Noble Energy commits to comply with the EU-US Privacy Shield Framework, as set forth by the U.S. Department of Commerce, for the processing of personal data originating from member states of the European Union. Accordingly, Noble Energy has certified to the U.S. Department of Commerce that it complies with each of the seven EU-US Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. In the event of any conflict between the provisions of this policy that apply to personal data originating from member states of the European Union and the EU-US Privacy Shield Principles, the EU-US Privacy Shield Principles shall govern and control. To learn more about the EU-US Privacy Shield Framework, and to view Noble Energy's certification page, please visit <http://www.privacyshield.gov>.

16. Limitation on Scope

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	PRIVACY POLICY	Version: 5 Date: 04/30/2018
		Effective Date: 04/30/2018
		Last Reviewed: 04/30/2018

Noble Energy reserves the right to transfer any personal information we have about you in connection with the sale or transfer of all or part of the Company’s business or assets. In addition, adherence by Noble Energy to this policy may be limited to the extent required for the Company to meet its legal, governmental, national security or public interest obligations, or as otherwise permitted under the EU-US Privacy Shield Framework or applicable law.

17. Changes

Noble Energy may amend this policy from time to time by posting a revised policy on Noble Energy’s Internet site. When we do so, the Company will revise the “last amended on” date at the bottom of this policy. For material changes to this policy, Noble Energy will place a notice on the home page of the Company’s Internet site by revising the link to this policy to read “Updated Privacy Policy” for at least 60 days. Providing personal information to Noble Energy after such date constitutes acceptance of such changes. We encourage you to view this policy regularly for updates.

18. Management Leadership and Oversight.

Administration of this policy is the primary responsibility of the Company’s Chief Compliance Officer.

19. Resources for Additional Assistance.

The Company recognizes that questions may arise involving this policy or related policies and programs. Questions may be directed to Noble Energy’s Noble Talks via the 24-hour Help Line (+1-866-311-4219) or website (NobleTalk.EthicsPoint.com).

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