

	EU JOB APPLICANT DATA PRIVACY POLICY	Version: 4 Date: 05/03/2017
		Effective Date: TBD
		Last Reviewed: 05/03/2017

1. Introduction

This policy applies only to personal information originating from the member states of the EU about job applicants that is processed by Noble Energy.

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 that personal information about job applicants may be processed in any country where Noble Energy maintains facilities.

Your provision of personal information in connection with your recruitment or job application and selection process with 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, your refusal to provide any personal information may disadvantage you in the hiring process.

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 job applicant of Noble Energy in the EU who has personal data originating in the EU transferred outside of the EU.

2.3 “Personal information” and “personal data”

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

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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 upon personal information, such as its collection, recording, organization, storage, modification, retrieval, access, use, disclosure or dissemination, erasure or destruction.

2.7 “EU”

“EU” refers to the member states of the European Union and the European Economic Area

3. Information We Collect, How it is Collected and How it is Used

Noble Energy may collect, or you may choose to provide, any or all of the following types of personal information in connection with your recruitment or job application and/or your selection by the Company: your name, addresses, e-mail addresses, telephone numbers and other contact information; biographical information, such as schools attended, degrees earned, job qualifications, and civic and community involvement; jobs for which you would like to submit an application; personal identification numbers; and photographs and other images. |

In most cases, you are the best source of information about yourself. Therefore, to the extent practical and appropriate, Noble Energy collects personal information directly from you. In those cases where it is necessary to collect your personal

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information from third parties, Noble Energy uses sources that the Company believes to be reputable and that ensure that your privacy interests will be respected in accordance with this policy and applicable laws. Examples of when Noble Energy may seek personal information from others include reference and background checks.

Noble Energy processes your personal information to communicate with you, manage the Company's recruiting and hiring processes, and for compliance with corporate governance and legal and regulatory requirements. If you are hired, your personal information may also be processed as described in Noble's EU HR Data Privacy Policy, a copy of which will be provided or made available to you.


4. 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 than that for which it was originally collected (in each case other than as provided in this policy). Noble Energy will provide you with the explicit opportunity to decline (opt-out) having your personal information disclosed to a third party, or used for a purpose other than that for which it was originally collected or subsequently authorized by you. In addition, Noble Energy will not disclose any of your sensitive information to a third party, or use any of your sensitive information for a purpose other than that for which it was originally collected or subsequently authorized by you, without first obtaining your affirmative and explicit (opt-in) consent.

5. 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. In addition, Noble Energy may use and disclose your personal information (1) 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, or (2) for Noble Energy to make employment decisions, so long as such use is only

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to the extent and for the period necessary to avoid prejudicing the Company's ability in making such decisions.

6. 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 the Company unless the third party has entered into an agreement with Noble Energy 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, unless Noble Energy proves that it is not responsible for the event giving rise to the damage.

7. 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.

8. 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, such as individuals provided as references, that 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 to consider you for

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other job opportunities and as required by law. To the extent permitted or required by law, Noble Energy may delete your personal information at any time.

9. Access

If at any time you wish for us to stop using your personal information for any purpose, you wish for us to remove your personal information from our records, or you would like to review or modify 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 then make a reasonable effort to accommodate your request, where appropriate, as soon as it is reasonably possible to do so. However, Noble Energy is not required to accommodate your requests in those circumstances where the Company may restrict such access under the EU-US Privacy Shield Framework or applicable law, 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;
- 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

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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.

10. Recourse, Enforcement, and Liability.

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).

For any privacy-related complaints regarding your personal data that cannot be resolved with Noble Energy directly, the Company has chosen to cooperate with EU data protection authorities and comply with the information and advice provided to it by 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 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>.

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 EU 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 EU data protection authorities.

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11. 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. 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 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>.

12. Limitation on Scope

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.

13. 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 pages 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.

14. Management Leadership and Oversight.

Administration of this policy is the primary responsibility of the Company’s Senior Vice President of Human Resources.

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15. Resources for Additional Assistance.

The Company recognizes that questions may arise involving this policy or related policies and programs. Questions may be directed to the Company’s 24-hour Help Line (+1-866-311-4219). **[HR: Please provide an external website/email address for this policy only]**

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