General Privacy Notice ("Notice")
Updated: 03/February/2019

Introduction

Columbia Shipmanagement Limited and its affiliates (referred to as "we", "our", "us", or "CSM") recognise and respect the rights and privacy of individuals. This includes our applicants, current and former employees, suppliers, passengers on board the vessels we manage, and our customers.

This Notice explains what we do with your personal data, whether we are considering your application for employment, continuing our relationship with you, providing you with a service, receiving a service from you, or if you are visiting our premises or our website.

It describes how we collect, handle, and process your personal data, and how, in doing so, we comply with our legal obligations. We consider privacy to be important and are committed to protecting and safeguarding your data privacy rights. The use of the word "processing" in this Notice is intended to include such actions as collecting, handling, using, storing and protecting your personal data.

This Notice applies to the personal data of Data Subjects such as yourself, our **Employees** (on board and ashore), **Customers**, **Visitors**, **Suppliers of goods and services, Website Users**, and others whom we may contact in order to collect more information about our Employees or those whom they have indicated as an **Emergency contact**.

If you are a member of Staff, you should also refer to the company Data Protection Policy and Data Protection Handbook, with which we have already provided you.

Legal framework
This Notice is written to comply with the applicable data protection legislation which includes, but is not limited to, the European Union General Data Protection Regulation (GDPR).

The company responsible for your personal Data (Data Controller)
Name: CSM
Phone: +357 25843100
Email: shipmanagement@csmcy.com
Address: Columbia House, 21 Spyrou Kyprianou Avenue, 4042 Limassol, Cyprus

Data Protection Officer
Name: Mr Andreas Andreou
Phone: +357 2584100
Email: CSMDPO@csmcy.com
Address: Columbia House, 21 Spyrou Kyprianou Avenue, 4042 Limassol, Cyprus

How do we use data?
We may process personal data as part of our shipmanagement services. Such processing may include, but is not limited to, employment contracts, anti-money-laundering, risk management, claims handling, document processing, marketing, procurement, and newbuilding supervision.

What personal data do we collect?

Employees (on board and ashore)**:**
In order to consider you for employment, or employ you, we need to process certain information about you. We only ask for or collect details that help us provide what is required as part of your application process or employment. For example, we need information such as your name, age,

contact details, education details, employment history, emergency contacts, next of kin, immigration status, passport size photos, passport copies, overalls size, bank account details, utility bills and other relevant information required for the purposes of your employment or that you may choose to share with us. Where appropriate, and in accordance with local laws and requirements, we may also collect information of a more sensitive nature, such as diversity information, information related to your health, or details of any criminal convictions.

To enable shore employees to conduct our business, they have been provided with access to one another's contact information including name, position, telephone number, work address, work e-mail address, and photograph (should you choose to provide one).

Employees should be aware that photographs and videos are taken on our premises and during events we organise; selections of such material may be used for company marketing purposes (for example on our website or in promotional leaflets or posters) and their image or parts of their image may appear in the material or the background of said material.

Training and maintaining proficient and qualified employees is of great importance to us and as such, various training regimes and campaigns are in place both on-board and ashore. To this end we use several training systems provided and maintained by third-party providers. These may also include automated survey service suppliers, for feedback purposes not only to improve training but other aspects of employment such as our management system or work practices.

Insurance plays an important role in our operations and is prominent in relation to the vessels we manage. We undertake claims handling for a large number of vessels which includes individual seafarer illness and injury, protection and indemnity claims involving cargo, shippers, and receivers, and hull and machinery claims involving the structure of the vessel. In all these claims, and particularly with medical claims, we process personal data which may be provided to the relevant insurer.

We operate an open reporting policy. In the interests of maintaining confidentiality and impartiality the open reporting platform and service is provided by a third-party provider.

Customers
To enable us to communicate with you and to ensure that we meet certain legal requirements such as KYC (know your customer) and AML (anti-money-laundering), we need to have certain details of yours or details of individual contacts at your organisation (such as their names, telephone numbers and e-mail addresses).

We ensure that our marketing communications to you are relevant and timely.

Website Users
We collect a limited amount of data in order to improve your experience when using our website.
This includes information such as the frequency with which you access our website, and the times that our website is most popular.

Suppliers of goods and services
We collect a small amount of information from our Suppliers to ensure that operations work properly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements).

Emergency contacts
As part of due diligence and in order to protect the vital interests of our Data Subjects, we will under certain circumstances collect emergency contact details.

Visitors
When visiting our premises, we collect the necessary personal data required for security and notification purposes. For security purposes, we also operate a Closed Circuit Television system (CCTV). The CCTV cameras only operate in common areas of our premises and are positioned so as not to intrude on privacy. The footage is kept for no longer than a month and access is strictly regulated.

The legal bases we use for lawful processing
In order to conduct business and fulfil our legal, regulatory, and contractual obligations, we need to perform legitimate and fundamental processing activities. These are:

1. Establishing contracts
2. Maintaining contracts
3. Provision of all contracted services
4. Invoicing: remittance, payments, and collections
5. Non-promotional communications
6. Marketing and other promotional communications
7. Risk management contract review
8. Response to Subject Requests
9. Performance measurement
10. IT and telecommunication support services
11. Business Continuity and Contingency Planning
12. Legal and regulatory obligations
13. Responding to enquiries, requests, and complaints
14. Employment processing
15. Workforce planning
16. Training and certifications
17. Emergency communications
18. Interacting with other organisations, industry groups, and professional associations
19. Internal ethics reporting, security, and investigations

Who will access or receive the data?
We need to share the personal information we process with individuals themselves and also with other organisations. The list below contains a description of the types of organisations with which we may need to share some of the personal information we process.

1. Agents and brokers
2. Business associates, other professional bodies, and advisers
3. Central and local government
4. Claimants, beneficiaries, assignees, and payees
5. Claims investigators
6. Complainants, and enquirers
7. Courts and tribunals
8. Credit reference, debt collection, and tracing agencies
9. Current, past, and prospective employers
10. Customers
11. Debt collection and tracing agencies
12. Education and examining bodies
13. Employment and recruitment agencies
14. Family, associates, and representatives of the person whose personal data we are processing
15. Financial organisations and advisers
16. Healthcare professionals, social and welfare organisations
17. Insurance providers
18. Law enforcement and prosecuting authorities
19. Learning management system providers

20. Ombudsman and other regulatory authorities
21. Open reporting system providers
22. Other affiliated companies
23. Pension schemes
24. Police forces
25. Private investigators
26. Professional advisers
27. Share Administrators
28. Suppliers and services providers
29. Survey and research organisations
30. Training system and software providers
31. Unions, trade associations, professional bodies, and employer associations

The countries where data will be stored, processed and/or transferred
Your personal data we collect may be stored and processed in the EU or any other country in which we or associated third parties maintain facilities. In case we need to transfer your personal data, we will take all reasonable measures to safeguard the transfer of your personal data to third parties in a manner that complies with the applicable data protection laws.

How long will the data be retained?
Retention of specific records may be necessary for one or more of the following reasons:

1. Fulfilling statutory or other regulatory requirements
2. Evidencing events/agreements in case of disputes
3. Operational needs
4. Historical and statistical purposes

Where we collect personal data for which we subsequently have no use for any business purpose we will then review and may destroy such personal data at our discretion.

The right to withdraw consent
In situations where we request and receive your consent to perform processing, we are also obliged to stop such processing if you decide to withdraw your consent. Withdrawing consent is as straightforward as giving consent. Withdrawing consent cannot be back-dated so it has no effect on processing already performed during the period of consent.

The right to access, change, delete, restrict, object, request a copy
Under certain circumstances you have rights regarding your personal data. These are:
1. Access to a copy of your personal data
2. Object to processing of your personal data
3. Stop receiving direct marketing material
4. Object to decisions being taken by automated means
5. Have inaccurate personal data rectified, blocked, erased or destroyed
6. Lodge a complaint with the relevant data protection authority
7. Claim compensation for damages caused by a breach of the GDPR

If you are an employee, and wish to exercise any of these rights, please follow the relevant company procedure. If you are not an employee, please contact CSM directly.

What happens if the data is not collected?
Your personal data is required for communication and setting up a contractual agreement to provide employment, products, and services. Without this data we will not be able to communicate with you or enter into a contractual agreement with you. This includes both business and employment contracts.

We need personal data to:
1. Enable consensual bilateral communications
2. Engage in pre-contractual activities
3. Honour contractual obligations
4. Be able to employ people

Without this data, we will not be able to perform these primary activities.

Automated decision making

We do not use automated decision making.

Cookies

A cookie is a small file placed onto internet enabled devices in order to recognise a device upon recurring visits, and in turn enable a website's features and functionalities. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookies may transmit information via a device's browser with a purpose of authentication or identification via the IP address. For example, cookies enable us to identify a device, secure access to our websites, and keep track of web browsing preferences.

Cookies may also be used for recognising you as the user when you visit our website, remembering your preferences, and overall giving you a more personalised experience that's in line with your settings.

Essentially there are two types of cookies:
- persistent cookies, and
- session cookies

A persistent cookie helps the website (and third party applications) to recognise you as an existing user, so it is easier to return and continue your existing user experience.

Session cookies are temporary cookies that remain on your device until you leave the website.

When do we use cookies on our websites?

Our websites only utilise persistent cookies when any browser loads the site, essentially for keeping track and observing website visitor trends and statistics. This is applicable to various internet enabled devices, e.g. PC's, smartphones and tablets.

Cookies may also be placed in your browser when visiting our website via third party application plugins or when using third party modules on the website. This applies when using social media "sharing" tools via third party application plugins. We do not, however, have access to details regarding your social media or personal data during this process. We can only see which pages of our website have been shared collectively over social media and how many times.

The table below demonstrates the cookies that we use and explains why we use them.

Cookie Name	Description
_ga	Used to distinguish users.
_gid	Used to distinguish users.

_gat	Used to throttle request rate.
__utma	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookie exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	Used to throttle request rate.
__utmc	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	Stores the traffic source or campaign that explains how the user reached our site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.

Controlling Cookies on your Device

Cookies on an Internet device help make the user experience of our websites better.
By continuing to use this website, you are consenting to the use of this site's cookies and similar technologies for the purposes we describe in the Cookies section of this Privacy Notice. If you do not agree to the use of cookies in this or any such way, you can set your browser privacy and cookies settings accordingly.

Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device, as well as delete them.

There are a number of ways to manage cookies. Please refer to your specific browser instructions or help screen to learn more about how to adjust or modify your cookie browser settings. If you use different devices to view and access this website (e.g. PC, smartphone, tablet, Smart TV) you will need to ensure that each browser on each device is adjusted to suit your cookie preferences accordingly.

For further information on Cookies, such as deleting, disabling or blocking cookies, please visit AboutCookies.org

For more specific information on how to adjust cookie configurations, please refer to your specific browser.

Changes to our Notice

Any changes we make to our Notice in the future will be posted on this page. Please check back frequently to stay informed of any updates or changes.

Where we intend to further process your personal data for a purpose other than that for which the personal data were collected, we shall provide you, prior to that further processing, with information on that other purpose and with any relevant further information.