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Purpose: To specify the responsibilities of the Seafarers and of the Company, in protecting the privacy of the Seafarers and other persons working indirectly for the Company.

I. INTRODUCTION

The Company is entrusted with the processing of personal data relating to its Seafarers and other persons working indirectly for the Company.

Compliance with the Privacy Code of Company (the Code) is crucial since the Company wishes to continue to foster the trust and confidence of the Seafarers and contractors in the way it handles their personal information.

Privacy comprises the information privacy, often referred to as data protection, which concerns the protection of information about individuals.

This Code primary concerns the processing of personal information, which includes the collection, storage, access, use, updating, disclosure, disposal, destruction or any other processing of such information.

This Code aims at facilitating compliance with relevant privacy and data protection laws, thereby ensuring the correct processing of personal data and minimizing the legal liability.

The purpose of this Code is to specify the responsibilities of the Seafarers and of the Company in protecting the privacy of the Seafarers and other persons working indirectly for the Company.

II. DEFINITIONS

Personal Data All information identifying or allowing to identify an individual. This includes personal data held in manual filing systems, electronic or network systems or databases.


Sensitive Personal Data Personal data relating to health, race, political opinions, religious or philosophical beliefs, trade union membership, sexual preferences, fines, convictions, judgements, penalties, imprisonment, genetic and biometric data.

Data Controller Any natural or legal person, public administration, body, association or other entity that is competent, also jointly with another data controller, to determine purposes and methods of the processing of personal data and the relevant means, including security matters.

Data Processing Any single or series of operations carried out on personal data, which includes the collection, storage, access, use, updating, disclosure, disposal, destruction or any other processing of such personal data.

Data Processor A third party processing any personal data on behalf of the Company (e.g. direct mail company, payroll service provider, etc.)

Commission for the protection of privacy ("the Commission")
An independent commission of experts established by Belgian law. The Commission provides advices to authorities and makes recommendations to anyone entrusted with Data Processing. The Commission has an investigating power and Commission members, acting as officers of the

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judicial police, may enter any location where they suspect personal data processing activities are taking place.

Identified Business Purpose

A business purpose that is clearly identified by the Employer and in respect of the Employer may collect and use personal data needed for a proper execution of our business.

Confidential Information

All information, intellectual property like copyrights, company secrets, trademarks and innovative ideas which are valuable assets for the Company.

III. GOVERNANCE AND RISK MANAGEMENT

This Code is supplemental to the Code of Business Ethics of the Company. This includes policies, procedures and structures designed to ensure compliance with applicable laws and regulations. For each policy or risk area a Key Risk Officer has been designated to monitor compliance of the relevant policy and to increase awareness.

Any questions or any reports or suspicions of non-compliance with this Code may be addressed to the following persons:

Capt. Yuri Verniers – Managing Director –
Yuri.Verniers@seavie.com –
 +1.876.861.3817 (WhatsApp/Phone)

IV. PRIVACY AND PERSONAL DATA: DATA OF SEAFARERS

The Company respects the confidentiality of the Personal Data of contracted Seafarers, and only collects and retains the information that is required for the proper execution of its business activities.

1. Collection of Personal Data

Two main methods of collection of Personal Data are identified:

- The Seafarer directly provides Personal Data to the Employer
- The Employer receives Personal Data from third parties such as other Manning agents, temporary employment agencies, recruitment offices


2. Processing of Personal Data

The Data Processing of Personal Data is subject to various principles:

Basis for the Data processing

Data Processing of Personal Data is permitted, and is based on one of the following principles:

- **Consent**: the processing takes place on the basis of the voluntary, unambiguous and explicit consent of the Seafarer
- **Contract**: the processing is necessary in order for the Employer to comply with a contract with the Seafarer or the contractor
- **Law**: the processing is done by the Employer on the basis of any law or regulation enforceable upon it
- **Legitimate interest**: the processing is necessary in order to pursue a legitimate interest of the Employer

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Identified Business Purposes

Personal Data can only be collected and used for Identified Business Purposes.

The Company collects and processes Personal Data of its Seafarers in order to meet the Employer's statutory obligations with regard to labour law, taxation and social security, and to be able to implement a correct, complete and appropriate Seafarers administration.

Such Personal Data includes:

- [Payroll information](#), such as the national register number, date of birth, address, marital status, bank account number, etc. These data are necessary for the correct implementation of the payroll administration
 - [Data regarding the recruitment process](#), i.e., CVs, motivation letters, reports regarding the job interview, etc. These data are collected in order to complete the job application process
 - [Seafarers file](#): training programs attended, appraisals, warnings/notices of default, career counselling, job descriptions, medical certificates in connection with the Seafarers code
 - [The provision of shoe and clothing sizes](#) is necessary for the provision of work clothing
 - The name of a [contact person](#) in case of an emergency
 - [Photos](#) (for example on an Intranet, or following a teambuilding session, etc.) may be used for internal communication and for the promotion of a pleasant working climate and collegiality
- The Employer may not use Personal Data for other purposes.

If the Company processes Personal Data other than that included in these regulations, the Company will inform the Seafarer, prior to the collection of this data, about the purpose for which this is done and to whom the data will be provided. In this case, the Seafarer has the same rights as set out below.

Relevance

Only Personal Data that are adequate, relevant and necessary to meet the Identified Business Purposes shall be collected and used. In the same way, only Personal Data that are accurate and up to date shall be processed. This implies procedures to ensure that the collected Personal Data are refreshed and updated whenever needed.

Sensitive Personal Data

The Employer should not collect any Sensitive Personal Data unless the Seafarer has given his or her consent or when there is a legal obligation to collect such information.

Access and correction


Every member of the staff of the Company has access to his/her Personal Data that is processed by the Employer.

In addition, any member of the staff of the Company may request that his/her Personal Data be corrected if it is no longer accurate.

The Company will notify the Seafarer of its point of view, or, where applicable, implement the corrections with regard to the Seafarer within one month following the submission of a written request to that effect.

The Seafarer may ask the Company to limit the processing of his/her Personal Data.

Every Seafarer is also entitled to obtain the removal of all Personal Data relating to himself/herself that is incomplete or irrelevant, whose registration, disclosure or retention is prohibited, or that is retained beyond the permitted retention period. Within one month following the written request, the Employer will notify the Seafarer as to whether or not he has complied with the request for removal, and to what extent.

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The Seafarer cannot object to the Data Processing of Personal Data that is necessary for the payroll processing, and the data that the Employer must have on the basis of a statutory provision. Insofar as the processing is based on permission, the Seafarer has the right to withdraw his consent at any time.

The Seafarer also has the right to oppose the Data Processing (of his/her Personal Data) for serious and legitimate reasons.

The Seafarer has the right to obtain his/her Personal Data in a structured, standard and machine readable format and/or to transfer it to other controllers if the processing is based on permission or on an agreement, or if the processing is carried out by automated processes.

Based on the nature of their function, the following persons are authorized to deal with Personal Data:

- Managing Director
- Crewing Manager
- Fleet Personnel Officer(s)

Retention period

Personal Data should only be retained for as long as is necessary for a specific monitoring objective.

Access and use

Access and use of the Personal Data by the Employer's Staff Seafarer is on a 'need-to-know' basis.

Inside the Employer's organization, only authorized Staff Seafarers who need to have access to the Personal Data for the carrying out of their function should be able to have access to the Personal Data.

Security

The Employer shall ensure that Data Processing of Personal Data meets defined minimum security requirements, as updated from time to time. Such security requirements are defined in cooperation with IT-security.

Personal Data shall be managed and stored in an appropriate secure manner.

The Personal Data shall be protected from unauthorized access, use or disclosure by employees and any other unauthorized individuals, and from unintentional loss or destruction.


Transfer to and use by third parties

The Employer may use Data Processors in some areas of the business. As a general principle the Employer shall not transfer Personal Data. In circumstances where transfer of Personal Data is justified, the Employer shall ensure that disclosure of Personal Data is kept to a minimum and ensuring that the Data Processor (1) guarantees a sufficient level of security, (2) meets the minimum security requirements defined by the Employer; (3) acts solely on the Employer's instructions with respect to the Personal Data. The Employer (or its internal auditor) shall perform appropriate security audits to ensure compliance by the Data Processor with the instructions and with the security requirements.

Commission for the protection of privacy

Any intention of a Seafarer to contact the Commission should be reported to the Risk Committee prior to such contact taking place.

If the Seafarer believes that the above-mentioned provisions are not being complied with, or if he/she wishes to exercise the above-mentioned rights, he/she may contact the Managing Director either verbally or in writing.

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If the complaint or request submitted by the Seafarer is not resolved or completed satisfactorily, the Seafarer has the right to submit this complaint to the Commission (<http://privacy.fgov.be>).

VI. PRIVACY AND PERSONAL DATA: DATA FROM CUSTOMERS, SUPPLIERS, PARTNERS AND THIRD PARTIES.

Within the Company, only those authorised Staff Seafarers who have access to Personal Data in order to be able to carry out their duties may consult and process Personal Data.

The Seafarer is at all times obliged to maintain the confidentiality of the Personal Data that is entrusted to him/her, or that has come to his attention while carrying out his duties. He/she may only share this data with colleagues after verification as to whether they are authorised to be informed of the data in question.

The Seafarer undertakes not to share any Personal Data whatsoever, either consciously or unconsciously, with unauthorised persons, including third parties. Personal Data may never be used by the Seafarer for any purpose other than that determined by the Employer, and in line with his duties.

1. How Seafarers should handle Confidential Information/Personal Data

- Paper documents containing information that is considered to be confidential may only be sent by mail in a closed envelope marked CONFIDENTIAL and with a clear indication of the addressee
- When passing on information by telephone, the Seafarer must always ensure that he has an authorised person on the line
- As far as electronic information is concerned, the Seafarer will comply with the code regarding the use of the Company's ICT infrastructure (including e-mail and Internet)
- The Seafarer is himself/herself responsible for the correct saving of his/her files and for the safe keeping of his/her own password
- It is the responsibility of the Seafarer to not share Confidential Information or Personal Data with unauthorised persons
- The Seafarer must immediately report to the Employer any security problems or violations in the context of privacy of which he is aware
- Seafarers who have access to Personal Data are obliged to respect the confidential nature of this data

2. Reporting obligation

As soon as a Seafarer within the organisation becomes aware of a data leak or a breach/violation of the privacy, he must immediately notify this to the Managing Director.


A notification is preferably carried out by e-mail or in writing, but may also take place verbally or by telephone.

A notification of data leaks or privacy infringements must take place immediately following their discovery. The person who makes such a notification must ensure that he/she will be available for further follow-up.

3. Clean desk policy

Seafarers must observe the following rules when they leave their desk:

- All paperwork, and in particular all Confidential Information, must be removed from the desk and be stored in a locked cabinet or locker

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- USB sticks, CDs and DVDs must also be stored in locked cabinets, and may not be left at the workplaces
- All confidential documents intended for the wastepaper bins must be destroyed before leaving the workplace
- Computers or laptops must always be secured when leaving the workplace. At the end of the day, they must be completely locked, and be stored in a locked cabinet
- Confidential Information may only remain outside the archives or cabinet for the time necessary for handling the file
- The keys of lockers and/or cabinets may not remain unattended under any circumstances

4. Confidentiality

For the benefit of the Employer, the Seafarer will keep all Confidential Information and Personal Data confidential and shall handle it in a confidential manner.

He/she will not disclose, distribute or transmit any Confidential Information or Personal Data, which he/she acquired or received during the term of his/her employment contract, in any way whatsoever, either during his/her employment by the Company or at any time after termination of the employment contract. Nor shall the Seafarer use or attempt to use Confidential Information or Personal Data during his/her employment by the Employer or at the termination thereof.

Penalties

The Company reserves the right to take any measures it deems necessary if the Company detects any infringements of the Privacy code.

References

(EU) Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and on the repeal of Directive 95/46/EC (General Data Protection Regulation)