

DATA PROTECTION POLICY

A. INTRODUCTION

Z. & G. Halcoussis Co. Ltd. (hereinafter called "The Company") needs to collect personal information to effectively carry out everyday business functions and activities to provide the services defined by the Ship Management Agreements and the regulatory framework covering vessels operation. The Company is committed to processing all personal information under the **General Data Protection Regulation (GDPR)** and any other relevant data protection laws and codes of conduct.

B. PRINCIPALS

Personal data are processed according to the below principles: **are processed lawfully, fairly and in a transparent manner, are collected for specified, explicit and legitimate purposes, are adequate, relevant, and limited to what is necessary, are accurate and, where necessary, kept up to date, are kept in a form which permits identification of data subjects for no longer than is necessary, are processed in a manner that ensures appropriate security of the personal data,** (integrity and confidentiality) The Company has developed policies, procedures, and measures to ensure compliance with the data protection laws and principles.

C. PERSONAL DATA THAT COMPANY MAINTAINS FOR SEAFARERS/ SHORE STAFF/ THIRD PARTIES

1. SEAFARERS PERSONAL DATA

1.1. PERSONAL DATA THAT THE COMPANY PROCESSES FOR SEAFARERS (CANDIDATES)

Personal details: full name, photo, rank, contact details (telephone number, mobile phone number, email address, skype address and home address), passport details, VISA documents, birthdate, place of birth, age, marital status, number of dependents, wage, health insurance, CV, **Educational and previous employment information:** Degrees and diplomas, educational background documentation, certificates, professional and training history, employment records, seaman's book, certificate of competency, performance working capacity, training certificates, job application and interview records, info given voluntarily by the candidate for previous employment period, service with other companies (periods; name of ship, name of company,) **Special categories of personal data:** Medical history, medical fitness certificate, vaccination book, nationality, weight, gender, passport size photo.

1.1.A. PROCESSING PURPOSE For personal details -For covering vessels manning needs,-

For candidates' identification. **Educational and previous employment information:**

-Ensure that seafarers that will be employed will be Qualified/ Certificated/Medically fit/Trained and competent to carry out their duties.,- That manning levels are satisfied according to flag requirements and Company's standards/recruited and placed on board in compliance with the MLC 2006,-For candidate's capacity assessment,-For the Safety and security of vessels,-For improving Company's Operations in accordance to Company's policies,-For compliance with industry-specific requirements imposed by Charterers,-For safely manage of the Company's fleet,-Implementing Company's Management System (CMS), ISM, STCW, in accordance with national and international conventions , -Supporting potential legal proceedings,- Facilitating Communication. **For special categories of personal data**-Assessment of candidate's fitness to work,-Compliance with legal and contractual obligations,-Compliance with industry-specific requirements imposed by Charterers,-Dietary Prediction,-Provision of equal opportunities to all employees in terms of working condition, food, treatment, -Ensuring that adequate resources are available for the welfare of onboard employees.- Compliance with Flag State medical requirements. **On the basis of candidate's consent** Any consent granted, may be revoked at any time by contacting the Company.

1.2. PERSONAL DATA THAT COMPANY PROCESSES FOR SEAFARERS (CREW STAFF)

Personal details: Full name, contact details (telephone number, mobile phone number, email address, skype address and home address), photo, rank, marital status, dependents, parents and next of kin details (surname, name, relationship, email, telephone and home address), date and place of birth, passport and ID details, tax identification number, tax office, social security number, CV, visas details (US visas, Schengen visas and any other visas),

Educational and Employment information: Degrees and diplomas, educational background documentation, certificates, professional and training history, employment records, rank, seaman book, training certificates, familiarization check list, SEA, previous employment info, job application and interview records, complaints, performance working capacity, tickets- accommodation, certificate of competency, seaman's appraisal and evaluation report, MLC declaration form, shoes number and boiler suit, wages and payroll data (social insurance number, wages, payroll reports, allotments requests, etc.), service with the company (sign on and sign off dates, name of company's ship, sign on and sign off ports)

Special categories of personal data: Nationality, gender, copies of medical fitness certificate/medicals examinations, vaccinations, medical care, health data, medical certificates, cultural, religion, height, weight, D&A test, yellow fever, psychometric test results, insurance certificates, occupational injuries/diseases, records of medical incidents during

services, passport size photo, photos in drill reports and in diseases incidents , injury and sickness reports, symptoms, description of medical treatment, audio and video data in VDR.

1.2.A. PROCESSING PURPOSE: For personal details, -Seafarers identification **For Educational and Employment information**: Fulfilling vessels manning needs, Seafarers Capacity assessment, Complying with charterers requirements, Ascertain crew members fitness to work, Ascertain crew members efficiency for the performance of the work, Maintaining Vessels manning history, Preparation for future potential manning needs, Provision of clothing, Identification of crew members, Facilitating communication, Improve Company's operations, Ensures that all seafarers receive appropriate familiarization, Recruit people with the right competence and attitude, The performance of the Ship Management Agreement (SMA), The performance of Safety Management Manual Procedures ,ISM Code, STCW and MLC 2006 requirements, Local port regulations, Fit for Duty requirements as imposed by the ISM Code and the MLC 2006, Vessel's Flag Administration requirements, Evaluation by the company as required by the ISM Code, Support legal proceedings **For Special categories of personal data** Assessment of Seafarers fitness to work, Compliance with legal obligations, Compliance with contractual obligations, Compliance with industry-specific requirements imposed by Charterers, Dietary Prediction, -Pursuant to the Maritime Labour Convention, Provision of equal opportunities to all employees in terms of working condition, food, treatment, Handling different cultural and religious backgrounds respectfully, Ensuring that adequate resources are available for the welfare of onboard employees, Compliance with Flag State medical requirements. **For all** To protect the vital interests of the data subject or of another natural person, For the performance of a task carried out in the public interest, For the purposes of safeguarding legitimate interests, Indicatively and not limited to, for: Safety and security of the vessel, the cargo and personnel onboard, Seafarers' vital interest **On the basis of seafarer's consent** Any such consent granted, may be revoked at any time by contacting the Company.

2. SHORE STAFF PERSONAL DATA

2.1 PERSONAL DATA THAT THE COMPANY PROCESSES FOR CANDIDATES SHORE STAFF -:

Personal details: CV, Full Name, Email, Address, ID/ Passport Number, Phone number, Photo, Marital status, Dependents, Contact details, date and place of birth. **Educational and previous employment information**: Degrees & Diplomas, Training Certificates, Employment records, Qualification, Experience, Prior appraisals and evaluation forms, Certificates of competency, Recommendations **Special categories of personal data**: Photo.

2.1.A. PROCESSING PURPOSE: For personal Details -Covering Company's employment needs,-Identification of the candidate **For Educational and Previous Employment information:** -Capacity assessment of the candidate,-Covering Company's employment needs,-Ensure that adequate staff is provided to effectively implement Company's system,- Identify training needs,-Ensure that newly employed are adequately familiarized to the SMS prior taking over their duties,-Preparation signing of the contract,-Improve Company's operations,-Ensure candidates competency,-Compliance with industry-specific requirements imposed by Charterers **For special categories of data** -Compliance with industry specific requirements **-On the basis of consent** Any such consent granted, may be revoked at any time by contacting us.

2.2. PERSONAL DATA THAT THE COMPANY PROCESSES FOR SHORE STAFF : Personal details: CV, Degrees, Full Name, Email, Address, ID/ Passport Number, Phone number, Photo, Marital status, Dependents, parents name, next of kin Contact details, date and place of birth, rank, bank accounts, social security number AMKA, tax identification number AFM, tax office, authentication data (e.g., signature), Visa, position in the company, corporate mobile phones bills **Educational and Employment Information:** Degrees and Diplomas, educational background documentation, certificates, professional and training history, Employment Records, Rank, Previous employment, Job application and interview records, Applicant related recommended actions, certificates of competency, Employment Agreement, Dismissal notices, Drill reports, Discharge reports performance working capacity, complaints, Leave handover forms, Payroll reports, tickets and accommodation information, Leave requests, participation in industry forum certificates. **Special categories of personal data:** Medical leave, Doctors notes, health data, medical certificates, Photos, Nationality, Gender.

2.2.A. PROCESSING PURPOSE For personal details -Compliance with legal Obligations and contractual obligations,-Implementation of employment contract,-Fulfilment office employment needs,-Safety and security of facilities,-Identification of the employees,-Provide mobile phones to staff for operational purposes **Educational and employment information** -Safety and security of vessel (as vessels superintendents /operators),- Compliance with Shipping industry-specific requirements imposed by Charterers,- Improve Company's operations,- Ensure employees Performance,-Ascertain employments efficiency for the performance of the work **For special categories of data** -Assessment of employee's fitness to work,- Compliance with legal/contractual obligations,-Support for potential legal proceedings, Provision of equal opportunities to all employees in terms of working conditions **On the basis**

of shore staff consent Any such consent granted, may be revoked at any time by contacting us.

2.3. PERSONAL DATA THAT THE COMPANY MAINTAINS FOR THIRD PARTIES: **2.3.1. FOR CONTRACTUAL PARTNERS OF THE COMPANY** **Personal details:** Name, Address and Contact Details, Bank account number, Passport/ID number, Tax number and Tax office **Educational and Employment information:** Position in company, Educational details, Tickets and travel information, Payment records **2.3.2. FOR COMPANY'S BUSINESS CONTACTS** Name, Address, Contact Details, **2.3.3. FOR DATA SUBJECTS CONNECTED TO EMPLOYEES** Crew members' next of kin name and address, Spouses entering the vessel: Name, Relationship, Sex, Age, Medical information.

2.3.A. PROCESSING PURPOSE The Company process third party's personal data for one or more of the below reasons: **-For Personal details:** Compliance with legal / contractual obligations, Enabling communication, Safety and security of the vessel, **-For Educational and Employment information:** Assessment of contractual partners, Provision of services **For special categories of data** Ability to address health matters during a voyage **Based on consent** Any such consent granted, may be revoked at any time by contacting us.

D. HOW LONG THE COMPANY MAINTAINS DATA FOR CREW, SHORE STAFF AND THIRD PARTIES Hard copies and electronic files are retained for three years after seafarers and shore staffs signing off, and for third parties three years after the termination of the contracts/cooperation or passenger's disembarkation. Company may keep data for longer than the said period for legal and/or regulatory and/or technical reasons. (For example, in case of exercising or defending legal claims data are retained for 20 years in a locked cupboards)

In such cases, the Company ensures that privacy is protected. If a crew or a shore staff candidate is not acceptable hard copies are disposed of immediately. Under data subjects' consent data are retained with a view to a further job opportunity or with a view to a further cooperation, for 5 years. Such consent shall be periodically renewed. Data retained by the Company are reviewed and updated periodically.

E. DATA DISCLOSURE: No information relating to data subject's **personal** data is disclosed to anyone, other than in the cases permitted by the legal and regulatory framework in force from time to time.

Specifically Seafarers data are sent to: Shipowners and Ship Management Company for deciding if seafarers are suitable for employment on board their vessels and for compliance purposes with regulatory requirements (i.e. ISM, ISPS, MLC, STCW etc.), Charterers and Shipowners for operational purposes such as arranging working permits in the countries where the vessel operates, approving marine crew for offshore projects and for coordinating logistics, Flag state authorities for the issuance of flag state documents, Governmental Departments or authorities for compliance purposes with regulatory obligations, Vessel, Master of the vessel Local agents, Manning agents, Drug and Alcohol test providers, Travel agents for booking of flights and arranging visas; hotels for booking accommodation; train, bus and taxi companies for booking shore transport; port agents for taking care of immigration formalities and arranging the transportation of seafarers from/to the airport; Medical centres, Educational and Training centres for providing training courses, Auditors, Investigators, Technical consultants, Lawyers and Legal advisors, IT Companies, P& I Club, Authorities, Insurance Companies for insuring seafarers and paying compensations to them or their beneficiaries, Class Societies, Banks for payment of seafarers' wages, External Accounting firm, Psychometric test service providers, **Shore Staff data are sent to:** Shipowners and Ship managers for deciding if the applicant is suitable for employment and compliance purposes with regulatory requirements, Local agents, Travel agents for booking of flights and arranging visas; hotels for booking accommodation; train, bus and taxi companies for booking transport, Educational and Training centres for providing training courses, Auditors, Investigators, Technical consultants, Lawyers and Legal advisors, Authorities, IT Companies, Mobile phone Companies for operational purposes, Class Societies, Banks for payment of employees' wages, External accounting firm. **Third Parties personal data are sent to:** Shipowners and Ship managers for deciding if third parties are suitable for cooperation or entering on vessels and for compliance purposes with regulatory requirements, or for operational purposes such as arranging working permits in the countries where the vessel operates, Authorities for compliance purposes with regulatory obligations, Vessel, Master of the vessel Local agents, Travel agents for booking of flights and arranging visas; hotels for booking accommodation; train, bus and taxi companies for booking shore transport; port agents for taking care of immigration formalities and arranging the transportation of third parties from/to the airport; Investigators, Technical consultants, Lawyers and Legal advisors, IT Companies, Banks for payment.

Further the Company transfer data subject's personal data in and outside of the European Union in the following instances.- Where the Company (or any third party acting on Company's behalf) is legally compelled to do so or where disclosure is required for purposes of compliance with the legal and regulatory framework governing shipping industry (With insurance Companies, P& I Club, Medical Centres, Hospitals, public authorities psychometric test service etc.).-Where the Company has a contractual obligation to do so (with Managing Companies, Shipowners, charter parties, IT companies, mobile phone companies, class societies, etc.).- Where it is in Company's legitimate interests to disclose information (lawyers, legal advisors, authorities etc).- Where disclosure is made at the data subject's request or with data subject's consent or to satisfy the company's contractual obligations towards the data subject (Third parties as agents, Travel agents, banks, external accounting firm, etc.).- Where the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the Company and another natural or legal person.-

Where such transfer is necessary to establish, exercise, support legal claims or defend Company's rights. -Where the European Committee has issued delegated acts for the adequate protection of the personal data in the specific country or to an international organization. - Where the transfer is necessary for public interest. -Where the transfer is necessary to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent.

The Company takes appropriate safeguards to protect privacy when transferring data subject's personal data to the third parties as mentioned above, considering the nature of personal data and the risks and costs involved. Further, ensure that only personal data that is necessary for the purpose for which it will be processed is transferred. However, it may not always be practically possible for the Company to implement appropriate safeguards or to control the actions of such third parties. Therefore, the risk exists that personal data transferred might not be fully protected, particularly if the third parties are located in countries outside the European Union where privacy laws, rights and obligations may vary.

F. MAIN RIGHTS OF DATA SUBJECT: **Data subject has the below rights to:**1.-to know what personal data has been collected and how this data will be processed.2.-to request rectification of incorrect or incomplete personal data. 3.-to request erasure of their personal data. 4.-to request restriction on the processing of their personal data. 5.-to request their personal data be ported to them or a new provider in a structured, commonly used, and machine-readable format, and to the extent, this will not undermine the rights of others. 6.-to

object the processing of their personal data.7.-to withdraw any consent, they previously provided for the processing of their data.

G. TECHNICAL AND ORGANISATIONAL SECURITY MEASURES: The Company implements appropriate technical and organizational security measures to protect the data subject's personal data against unlawful processing and accidental loss, destruction or damage.

Specifically Technical security measures include: -data encryption. - firewalls and malware. -data backups. **Organizational security measures include:** -Physical security controls on the supporting assets (i.e., hardware, software, paper systems) and to the individuals who process, store and transfer personal data. -Data access restriction according to the authority and duties of individuals. -The Controller in each department maintain in hard copies as well as electronically the records of processing activities under its responsibility. In these records is evidenced that data are processed according to GDPR Regulation.

H. MODIFICATION OF DATA PROTECTION POLICY AND COMMUNICATION WITH DATA SUBJECTS

Changes of Company's data protection policy may take place from time to time preferable every three years. The revised data protection policy will be available either in the Company's premises or in the Company's website. The Company recommends that data subject review Company's policy in Company's website Further If you, as Data Subject, have any questions or want to exercise your rights or lodge a complaint, please contact with our Company's Data Protection Officers email address: gdpr@halcoussis.gr.