

# Privacy statement

Navigare and its subsidiaries respects your privacy. Privacy and the protection of your personal data is important to us and we are committed to protecting the integrity, availability, and confidentiality of your personal data. This Privacy Statement outlines your rights to privacy and our commitment to safeguarding personal data. It is meant to help you understand how we process and protect your personal data. "Personal data" means any information relating to an identified or identifiable natural person ('data subject').

This Data Protection Policy (hereafter "Policy") accounts for the personal information collected, processed, and used by Navigare Shipping and Navigare Logistics (hereafter also named "Company" or "We", Our, or just Navigare).

## Controller

Our Company processes personal data as an employer, prospective employer, as a supplier of services, for marketing related purposes and during its operations, its standard business as a crew and ship management company. It also collects personal information when co-operating with third parties / partners. We do not collect personal data through our website. The only cookie that is set, when you visit our website, is a language cookie, that decides what language the website is shown on – this is based on your language preferences in your browser.

[ For specific information about the protection of data collected through our website, you can read our website use privacy policy by follow the link: <https://www.navigare.fo/privacy-policy>]

[Since we do not collect third part cookies, our webpage will work properly without enabling third party cookies in your browser. In most modern web browsers, you can disable third party cookies to enhance your privacy online.]

## How we collect personal data

The Company collects personal information:

(i) directly from the data subject.

## What kind of data we process?

We process personal data that includes but is not limited to:

(a) information referring to a subject's name, contact details (full address, email address, phone number), birth date and place, gender, bank details, marital and family status, passport, visas and ID numbers, tax and social security numbers, as well

as information on previous experience, references and professional certificates, correspondence with or about the data subject, the contract of employment and any amendments to it and all information needed for the execution of a contract of employment, as is the case with our shore-based employees;

(b) information referring to a subject's name, contact details (full address, email address, phone number) and emergency contact details, birth date and place, gender, bank details, marital and family status, passport, visas and ID numbers, tax and social security numbers, as well as information on previous sea services and references, qualifications and certificates, the respective contract of employment and any amendments to it, correspondence with or about the data subject, and, where appropriate, disciplinary and complaint records, as is the case with our crewmembers;

(c) information referring to a subject's name, gender, identity card number or passport number, birth date and place, mailing address, telephone numbers, email address and other contact details, resume, educational qualifications, professional qualifications and certifications and employment references, as well as employment and training history or pictures/photographs maybe included in an application, as is the case with job applicants.

(d) information referring to a subject's name, contact details (mailing address, email address, phone numbers), tax ID, payment details, job title and role/function; delivery information; scanned version of invoices, billing, and similar documents, as is the case with our suppliers and our suppliers' personnel and representatives, including trainers, technicians, lawyers, accountants, auditors, and other service providers.

(e) information referring to a subject's name, contact details (mailing address, email address, phone numbers), tax ID, payment details, job title and role/function, as is the case with our agents and our agents' personnel and representatives; etc.

#### [Third party cookies on our web site:](#)

There are no third-party cookies used on our web site.

#### [Special categories of data](#)

Where necessary, we may keep information relating to a subject's health, which could include reasons for absence and /or accident reports and notes, as well as medical records, as is the case with crewmembers joining the vessels managed by us.

This information is used in order to comply with our health and safety and occupational health obligations, including in order to consider how a subject's health affects the ability to work and fulfil the respective employment obligations, as well as to comply with our statutory obligations and applicable legislation with regard to

recruitment, employment, other flag or local legal requirement with respect to occupational medicine and, evidently, to protect a subject's vital interests as is the case when protecting the safety and integrity of our crews at sea and the visitors or service providers onboard.

All above data and any other data that constitutes special category of data, including references to a subject's ethnic origin /nationality etc. are lawfully collected and processed by the Company and, unless this is not authorized or required by law or such information is required to protect the subject in an emergency, we obtain the subject's explicit consent.

### Why we process personal data

Personal data is processed by us as necessary for the performance of a contract to which the data subject is a party (as is the case with our employees, crewmembers, and third-party associates), as well as for compliance of the Company with a legal obligation. We also process personal data to pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings or insurance claims.

When we need to process personal data to pursue our legitimate business interests, for example to prevent fraud or potential crimes, for administrative purposes or to protect the Company's assets and to improve our efficiency, we try to never process a subject's data where these interests are overridden by the subject's own interests and we use only methods and technologies which are necessary, proportionate and implemented in the least intrusive manner, by appropriate means that ensure a balance with the subject's fundamental rights and freedoms.

### Deletion of web cookies and further information

When exploring our website, you may change your browser's settings to delete cookies that have already been set and to reject new cookies. To learn how to do it, visit the help pages of your browser:

- [Firefox](#)
- [Chrome](#)
- [Safari](#)
- [Microsoft Edge](#)
- [Internet Explorer](#)

In general websites may also be visited in your browser's "private" or "incognito" mode, in which case cookies will be set, and deleted when you close the browser.

### (iii) Recruitment

The Navigare group processes personal information submitted by you during your online or paper application process, as part of a recruitment process.

Personal data relating to vacant positions and applications will be deleted 6 months after you applied for positions onshore or as seafarer, unless you are employed or explicit consent for further storage is given.

We may desire to retain your personal data to consider you for future employment opportunities. In such an event, we will seek your consent, either during or after you formally apply for a job opportunity.

The legal basis for processing and storing your job application, CV and related information is your consent and that the processing is necessary to take steps at your request prior to entering a contract. For paper or e-mail application process contact our local manning offices where you submitted your application.

### (iv) Other purposes

Navigare Shipping may also use personal data for other additional purposes. Any such purposes will be identified at the time of collection and we will inform you of the purpose of the processing in accordance with applicable law requirements.

### Exchange and transfer

We may share your personal data within Navigare Shipping to the extent necessary for the purposes described above and with third parties when such sharing is necessary to provide services.

Navigare may use service providers for example for consultancy purposes, hiring services (temporary work arrangements) recruitment services, hereunder operating HR administration and tasks, facility services, IT services for delivering systems and related support, performing integrity due diligence of our business partners, processing transactions, or performing statistical analysis of our services.

Navigare will not transfer personal data to a third country outside of the EEA that does not provide adequate protection of personal data unless appropriate safeguards are applied, or the transfer otherwise takes place in accordance with applicable data protection legislation. Examples of such safeguards are Binding Corporate Rules, EU Standard Contractual Clauses or if the receiving party is certified under the EU-US Privacy Shield.

When required by law, regulation, legal process, or an enforceable governmental request, we may share your personal data for legal reasons within Navigare and to public authorities or governments but only to the extent we are required to do so.

### Data protection

We take data protection seriously and have adopted appropriate security measures to protect your personal data against loss, misuse, unauthorized access, theft, alteration, disclosure, or destruction. We will restrict access to your personal data to those who have a legitimate need for such access.

Navigare will provide training to employees and third parties where relevant to promote awareness of the group's policy surrounding data protection. Navigare group complies with legal requirements and avoids unacceptable legal risks.

### Retention of personal data

Navigare will only retain personal data if this is necessary for the purposes described above. When storage is no longer necessary, we will delete, destruct, or anonymize the relevant personal data.

### Your rights

Navigare's processing of personal data is governed by the GDPR.

You have the right to request access to the personal data that is being processed on your behalf and to request deletion or correction of inaccurate or incomplete personal data in accordance with applicable law requirements. This may be done by submitting a request in writing or via email to our authorized person in charge

Upon receipt of such written request to withdraw the consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with the subject) for the subject's request to be processed and for us to notify him/her of the consequences of our acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we seek to process and effect a subject's respective request within 30 days of receiving it.

You have the right to file a complaint with your national data protection supervisory authority, the Norwegian or the Faroese Data Inspectorate, depending on what office your data are processed by. The contact information for the Faroese and Norwegian Data Inspectorate is as follows.

**Address:** Faroe Islands: Dátueftirlitið (www.dat.fo) Email: dat@dat.fo | Tel: +298 309 100

**Address:** Norway: Datatilsynet ([www.datatilsynet.no](http://www.datatilsynet.no)) Email: [postkasse@datatilsynet.no](mailto:postkasse@datatilsynet.no) | Tel: +47 22 39 69 00

### Data Protection Officer

Navigare Shipping has no DPO.

Requests for access, rectification, and erasure, as well as reports of security breaches, are handled by the Chief Technology Officer.

### How we use and protect personal data

We do not collect more information than we need to fulfill the purposes for which we process personal data.

We hold accurate and up to date data in manners that reasonably ensure appropriate security thereof, protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

We restrict physical access to authorized persons and maintain and use appropriate technical and organizational measures and specified technological solutions and IT systems to protect the integrity, safety, security, and availability of the personal data we process.

### Monitoring – Ship tracking – CCTV surveillance

While onboard, geolocation of a subject is obviously monitored/tracked. In certain cases, computer and telephone/mobile telephone use are also monitored. The same applies while ashore, when and to the extent installation of a CCTV system is involved in our premises.

All for reasons relating to the subject's personal safety and integrity and as precautionary/preventive measures against piracy or other possible dangers while at sea; to protect our Company's assets and resources; and, mostly, to ensure the life, the safety and integrity of our people.

### E-mail correspondence

Any personal data (name, address, title/position, contact details) we send and/or receive in our e-mail or other electronic correspondence is processed in compliance with the GDPR and any other applicable law or regulation.

Our Company uses the personal data contained therein and any attachments thereto lawfully, fairly and in a transparent manner; for specified, explicit and legitimate purposes.

Our correspondence recipients are duly informed that they have all rights provided for by respective legislation regarding their personal data.

### Who has access to personal data?

A subject's information is disclosed only to appropriate Company's personnel, including, evidently, the Master/Officers of the ships managed by us.

We may also disclose personal data to port or other competent authorities if this disclosure is mandatory under applicable law.

Disclosure to tax authorities and to internal and/or external auditors is included.

We also disclose personal data to service providers onboard or ashore, as well as to our charterers, port and other agents, external consultants, training providers, business associates and professional advisors, including lawyers and accountants, as well as accredited clinics or doctors performing medical exams or prescribing medication to our crews prior to or during their recruitment) and to other third parties, if we are legally obliged to do so (flag requirements included) or where we need to comply with our contractual duties to the data subject, for instance where we may need to pass on certain information to our port agents responsible for the transportation, boarding etc. from and to ports or other destinations or to our insurance or other associates in case of an accident.

In all such cases, we do so where appropriate and only in accordance with local laws and requirements and we try to always ensure that such third parties have undertaken appropriate data processing obligations to ensure the security and confidentiality of the subject's data.

Due to our global activities and the nature of our business as a crew and ship management company, personal information may be transferred outside of the E.E.A. when we need to comply with our legal or contractual requirements. We do so only where an adequate level of protection is ensured or where we have in place safeguards including the use of standard contractual terms, to ensure the security of a subject's data in case of these transfers.

We might also transfer a subject's personal data to companies affiliated with the Company, if any, for purposes connected with the management of the Company's business.

### When we assign data processing

Where the Company relies on a third-party data processor, to execute processing on its behalf, we choose one who provides adequate security level and measures and undertake reasonable steps to ensure compliance of the data processor with such measures.

### Future use and update

If in the future, we intend to process personal data for a purpose other than that which it has been collected for we make sure to provide the subject with information on that purpose and any other relevant information if such purpose is not compatible with the initial.

### Changes to this Policy

We reserve the right to make changes to this Policy from time to time. Regularly reviewing our website ensures that a subject is always aware of the updated version.

If we make material changes to this Policy, we will promptly provide notification via prominent notice on our website.

### Contact in case of queries

For more information on our personal data policies and procedures and for guidance on privacy related issues, as well as for requests for access, rectification, erasure, etc. as above, you can contact our CTO at (bh(a)navigare.fo / +298 523038). We will endeavor to answer your questions and advise you on any steps taken to address the issues raised by you.