



PRIVACY NOTICE

1. Introduction

EPSCO (CYPRUS) LIMITED (Registration Number HE67042) and/or its subsidiaries and/or its affiliates provide services in the Maritime Industry (hereinafter referred to as "Epsco Group"). This Privacy Notice sets out how Epsco Group handles the personal data of individuals including our current and former employees, our applicants, our customers, website users and other third parties.

We fully understand the importance of protection of privacy and personal data for all persons our Group has dealings with, and this Privacy Notice explains:

- what personal information we collect about you;
- how we use your personal information;
- on what legal basis we process your personal information;
- how we collect your personal information;
- how do we store your personal information and who will have access to it;
- how long we keep your personal information for;
- when, how and why we may share your personal information with others and/or transfer it internationally;
- how we protect your personal information and what principles we follow;
- your rights regarding your personal information; and
- how to contact us and how to contact the supervisory authority and lodge a complaint;

This Privacy Notice applies to all current and former Epsco Group employees, applicants, customers, website users and the individuals indicated as emergency contacts by our current employees ("you", "your").

We recognise that the appropriate and lawful process and treatment of your personal data will preserve confidence in the Group and will provide for successful business operations. Protecting the confidentiality and integrity of personal data is a critical responsibility that we consider of the utmost importance.

2. Definitions

Personal Data: any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,



consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor: a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

Consent: any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Data concerning health: personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about health status.

Supervisory authority: means an independent public authority which is established by the Republic of Cyprus or another Member State.

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

EEA: European Economic Area

3. What personal data we collect and how we use it

Employees

For applicants, we only require information that is necessary to process and assess your application and establish your contract of employment. For example, we may ask from you information such as your name, last name, contact details including your home address, phone number and e-mail address, education details, employment history, immigration status, social insurance number, photographs, passport or identity card number and copies. For our current employees, we only require the information that is necessary to your employment and fulfilling our obligations regarding your contract of employment. For example, we may ask from you your name, last name, identity card number, contact details including your home address, phone number and e-mail



address, emergency contact details, social insurance number, bank account details, photographs, and other relevant information necessary for the purposes of your employment. For current employees, when it is appropriate, and for limited purposes only, we may require from you, your medical information such as in the case an employee is absent from work due to illness for more than three working days.

Customers

To adequately communicate with you and to make sure that we comply with KYC (Know Your Client) and AML (Anti Money Laundering) requirements, we may need certain information from you such as your name, last name and contact details including your phone number and e-mail address. We ensure that only our marketing communications to you are relevant and timely appropriate.

Emergency Contacts

We require from our current employees to indicate emergency contacts and provide us with their details such as their name, last name, relationship to employee and contact details, such as phone number, so as to be able to contact them in case of emergency.

Website Users

We collect through cookies your IP address and your log in details.

4. Lawfulness of processing

Employees

Our legal basis for processing your personal data is the necessity of the performance of your contract of employment and for the purposes of pursuing our legitimate interests.

Customers

Our legal basis for processing your personal data is the necessity of the performance of a contract, pursuing our legitimate interests and consent.

Emergency Contacts

Our legal basis for processing your personal data is for the purposes of pursuing the legitimate interests of our employees and protecting our employees' vital interests.

Website Users

Our legal basis for processing your personal data is for the purposes of pursuing our legitimate interests and consent.

5. How do we collect your personal data

We use both electronic and physical means to collect your personal data that we need from you. For example, we may ask you to provide us with your data through a physical form or contract or through an electronic form or via e-mail.



6. How do we store your personal data

Our Group employs onsite and offsite security measures and securely stores your electronic personal data on Microsoft's SharePoint, local server and the physical data on secure locked places in our offices with limited access only by authorised personnel.

7. Who will have access to your personal data

Your personal data that our Group holds can only be accessed by Epsco Group Directors and Epsco (Cyprus) limited Chairman, Chief Financial Officer and HR/Office Administrator.

8. Retention Period

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Employees

We retain the personal data of our employees for seven (7) years after the termination of your employment for purposes of establishing, exercising or defending legal claims in accordance with the Limitation of Actionable Rights Law of 2012 and the Termination of Employment Law of 1967 and/or as required by the Tax Authority and/or otherwise.

Customers

We retain the personal data of our customers for seven (7) years after our relationship ceases to exist or when you withdraw your consent for purposes establishing, exercising or defending legal claims in accordance with the Limitation of Actionable Rights Law of 2012 and/or as required by the Tax Authority and/or otherwise.

Emergency Contacts

We retain the details of emergency contacts until the termination of employment of the relevant employee.



9. Security Measures

We implement appropriate technical and organisational measures in an effective manner to ensure compliance with data protection principles including those referred to in Article 32 of the GDPR.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data only to those employees who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any regulator of a breach where we are legally required to do so.

10. Data Protection Principles

We process your personal data in compliance with the following GDPR principles:

- (a) The personal data must be processed lawfully, fairly and in a transparent manner in relation to you (**'lawfulness, fairness and transparency'**);
- (b) The personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (**'purpose limitation'**);
- (c) The process of personal data must be adequate, relevant and limited to what is necessary (**'data minimisation'**);
- (d) The personal data processed must be accurate and where necessary kept up to date and every reasonable step must be taken to ensure that inaccurate personal data, considering the purposes for which they are processed, are erased or rectified without delay (**'accuracy'**);
- (e) The personal data must be kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed (**'storage limitation'**);
- (f) The personal data must be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (**'integrity and confidentiality'**).

11. Your data protection rights

You have the following rights in relation to your personal data:



- (a) **The right to access your personal data:** You have the right to request from us for copies of your personal data;
- (b) **The right to rectification:** You have the right to request from us to correct any information you believe is inaccurate or to complete any information you believe is incomplete;
- (c) **The right to erasure (“right to be forgotten”):** You have the right to request from us to erase your personal data if they are no longer necessary in relation to the purposes for which they were collected;
- (d) **The right to restriction of processing:** You have the right to request from us to restrict the processing of your personal data under specific circumstances;
- (e) **The right to object:** You may at any time raise objections about the processing of your personal data. When you exercise your right to object, we have to cease immediately the processing, unless we can provide the existence of a legal interest;
- (f) **The right to data portability:** You have the right to transfer your personal data to another organization or company in a legible and commonly used form;
- (g) **The right to recall consent:** You have the right at any time to withdraw your consent to the processing of your personal data. The withdrawal of your consent may affect and possibly terminate our services provided to you;
- (h) **The right to lodge a complaint:** You have the right to lodge a complaint to the supervisory authority about the processing of your personal data.

If you wish to exercise any of the rights set out above, please contact us in accordance with the below provided details.

12. Sharing of personal data with third parties

We may share personal data between Epsco Group Companies and with third parties within the EEA who act as service providers and perform certain tasks on our behalf. For any sharing or processing of personal data certain safeguards and contractual arrangements have been put in place.

13. Transfers of personal data to third countries or organisations

Generally, we do not transfer personal data to third countries or organisations unless certain safeguards and contractual arrangements have been put in place. We may



transfer personal data to our subsidiaries located in third countries provided that we ensure their compliance and adequate safeguards with GDPR.

14. Changes to this Privacy Notice and your duty to inform us of changes

This Privacy Notice is effective as of 01/06/2023 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately.

We keep this Privacy Notice under regular review. You will be notified promptly if any changes occur on this Privacy Notice.

The provisions of this document are not exhaustive, and Epsco Group shall at all times ensure full compliance with the GDPR. If any provision is or may in the future be conflicting with the provisions of local and European legislations, such provisions shall be disregarded, and the legislation shall prevail.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data change during your relationship with us.

15. How to contact us

If you have any questions about our Privacy Notice, the data we hold, or you would like to exercise your rights, please contact us at the below details:

General E-mail: info@epsco.cy

Phone No.: (00357) 25 733091

Address: 12C Kolonakiou Street, 1st Floor, Linopetra, Ayios Athanasios 4103, Limassol, Cyprus

16. How to contact the supervisory authority

If you feel that although you have exercised your rights of personal data protection you still have concerns about how we process your personal data and you believe that we did not address adequately your concerns, you have the right to lodge a complaint to the Office of the Personal Data Protection Commissioner. You can find further information on the following website: www.dataprotection.gov.cy.

Epsco Group

01/06/2023