

OLYMPIA OCEAN CARRIERS PRIVACY STATEMENT

23/05/2018

Olympia Ocean Carriers Limited is committed to protecting your privacy and handling your data in an open and transparent manner. The personal data that we collect and process depends on the service requested and agreed in each case. This privacy statement will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

In this privacy statement, your data is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as “processing” such personal data.

For the purposes of this statement, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number. The latest version of the Data Protection Policy can be accessed with the data privacy information at Olympia Ocean Carriers website www.olympiaoceancarriers.com/privacy.

Olympia Ocean Carriers leadership is fully committed to ensuring continued and effective implementation of this policy and expects all Company’s Employees and Third Parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.

This policy has been approved by the Company’s highest Management.

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1. Important information and who we are

Purpose of this privacy notice

This privacy statement:

- Provides an overview of how the company collects and processes your personal data and tells you about your rights under the local data protection law and EU General Data Protection Regulation (GDPR),
- Is directed to natural persons who are either current or potential employees / customers / suppliers / Service Providers of the Company,
- Contains information about when we share your personal data with other members of the company and other third parties,
- Is directed to natural persons who had such a business relationship with the company in the past.

Controller

Olympia Ocean Carriers is the controller and responsible for your personal data (collectively referred to as the Company, "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

Contact details

Our full details are:

- Full name of legal entity: Olympia Ocean Carriers Ltd
- Name or title of Data Protection Officer: Constantinos Moullos
- Email address: cm@ooc.com.cy
- Postal address: Lophitis Business Centre I, Corner 28th October & Emiliou Chourmouziou Street, 7th Floor, 3035, Limassol, Cyprus
- Telephone number: +357 25 029 470

You have the right to make a complaint at any time to the relevant data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

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Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 23 May 2018 and historic versions can be obtained by contacting our Data Protection Officer at cm@ooc.com.cy. We encourage you to review this privacy policy periodically.

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

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. What personal data we collect from you

Personal data is any information which relates to identified or identifiable natural person. Personal data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process personal data. An organisation that handles personal data and makes decisions about its use is known as a data controller. Olympia Ocean Carriers, as a Data Controller, is responsible for ensuring compliance with the data protection requirements outlined in this policy. Non-compliance may expose Olympia Ocean Carriers to complaints, regulatory action, fines and/or reputational damage.

We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, age, date of birth and gender.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about orders, invoices and payments to and from you and other details of services you have purchased from us or we have purchase from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Special Categories of Personal Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and/or information about criminal convictions and offences (e.g. for the purposes of employment).

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If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources.
 - Identity and Contact Data, Special Categories of Personal Data from appointed manning agents, port agents, travel agents, clinics for crew members and other parties for the smooth and punctual management of the fleet and company.
 - Identity and Contact Data from regulatory bodies (International Safety Management (ISM), Maritime Labour Convention (MLC), International Shipping and Port Facility Security (ISPS), and International Maritime Organisation (IMO)).
- **Children's data.** We understand the importance of protecting children's privacy. We may collect personal data in relation to children only provided that we have first obtained their parents' or legal guardian's consent or unless otherwise permitted by law we do not provide any online services to children but may allow children, with their parents' or legal guardian's consent to become members of our medical scheme in order to be protected against the possibility of facing significant unexpected medical costs. For the purposes of this privacy statement, "children" are individuals who are under the age of eighteen (18).

4. How we use your personal data

As mentioned earlier we are committed to protecting your privacy and handling your data in an open and transparent manner and as such we process your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

A. For the performance of contact

Where we need to perform the contract, we are about to enter into or have entered into with you (e.g. for our employees in office, crew members, surveyors, engineers, technicians, auditors, manning agents, port agents, suppliers, legal consultants, accountants, charterers, travel agents and customers/clients).

B. For compliance with legal obligations

Where we need to comply with legal or regulatory obligations emanating from the relevant laws to which we are subject as well as statutory requirements, e.g. Deputy Ministry of

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Shipping, the Money Laundering Law, Tax laws and, Payments Law. There are also various supervisory authorities whose laws and regulations we are subject to e.g. International Safety Management (ISM), Maritime Labour Convention (MLC), International Shipping and Port Facility Security (ISPS), International Maritime Organisation (IMO).

C. For the purpose of safeguarding legitimate interest

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. For example, we use your personal data for employment with our company, for manning of the vessels on board, for visitors attending the vessel (i.e. surveyors, auditors, engineers and technicians) and for any other services concerned the smooth and punctual management of the fleet)

D. You have provided your contest

Provided that you have given us your specific consent for processing (other than for the reasons set out hereinabove) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our Data Protection Officer at cm@ooc.com.cy if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register a new employee to Olympia Ocean Carriers and to employee a new crew member. This includes: (a) Salary payment to employees and crew members, (b) Payment of any other fees and charges,	(a) Identity (b) Contact (c) Financial Data (d) Transactional data	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for the smooth management of the fleet). (c) Necessary to comply with legal obligations.
To register our employees as members of our Provident Fund	(a) Identity	(a) Performance of a contract with

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<p>Scheme. This includes monthly contributions to the Provident Fund Scheme.</p>	<p>(b) Contact (c) Financial Data (d) Transactional data</p>	<p>you. (b) Necessary to comply with legal obligations.</p>
<p>To register our employees to the Medical Scheme. This includes monthly contributions to the Medical Scheme.</p>	<p>(a) Identity (b) Contact (c) Financial Data (d) Transactional data</p>	<p>(a) Performance of a contract with you. (b) Necessary to comply with legal obligations.</p>
<p>To hire a potential new employee in our office or a crew member. This include review of curriculum vitae of the potential employee or crew member.</p>	<p>(a) Identity (b) Contact (c) Special Categories of Personal Data</p>	<p>(a) Necessary for our legitimate interests (employment process).</p>
<p>The chartering department ensures that our vessel is hired out to a charterer.</p>	<p>(a) Identity (b) Contact (c) Financial Data (d) Transactional data</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for the smooth and punctual management of the company and fleet).</p>
<p>The purchasing department ensures that all goods, supplies and inventory needed to operate the vessel are ordered.</p>	<p>(a) Identity (b) Contact (c) Financial Data (d) Transactional data</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for the smooth and punctual operation of the vessel).</p>
<p>For the crew management of the vessel, otherwise known as crewing. This includes: (a) Recruitment of crew members, (b) Crew change of crew members, (c) Claims to P&I Club for crew cases, (d) Organizing allotments and</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special Categories of Personal Data</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for the smooth management of the fleet). (c) Necessary to comply with legal obligations.</p>

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<p>final payments of crew member, (e) Monthly fee payments to agents.</p>		
<p>Anyone who comes and spends time on board with the permission of the owner, operator or master and who is not a seaman of the vessel.</p> <p>This includes, stevedores, pilots, customs officers, representatives of port authorities and other state or public bodies, cargo superintendents, non-fare paying passengers, marine superintendents, spouses and partners and friends and families of seamen, riding and maintenance crews, familiarisation crews of prospective purchasers of the insured vessel, official or unofficial guests of the ship owner or operator or charterer, as well as surveyors and attorneys.</p>	<p>(a) Identity (b) Contact (c) Special Categories of Personal Data</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for the smooth management of the fleet). (c) Necessary to comply with legal obligations.</p>

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Who receives your personal data

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Company. Various service providers and third parties may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with the Company by which they observe confidentiality and data protection according to the data protection law and GDPR.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

Under the circumstances referred to above, **recipients of personal data** may be, for example:

- Supervisory and other regulatory and public authorities, inasmuch as a statutory obligation exists (refer to point 4)
- Credit and financial institutions such as correspondent banks,
- Management companies,
- Valuators and surveyors,
- For our anti-money laundering process, such as credit reference agencies,
- External legal consultants,
- Financial and business advisors,
- Port agents and contractors worldwide
- Charterers
- Broking houses and Companies
- Insurers
- Auditors and accountants,
- File storage companies, archiving and/or records management companies, cloud storage companies,
- Companies who assist us with the effective provision of our services to you by offering technological expertise, solutions and support and facilitating payments,
- Purchasing and procurement and website and advertising agencies,
- Ship Builders and Ship Repair Yards.

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Measures in place to ensure the safety of personal data

Article 32 of the GDPR obliges data controllers and data processors to implement the technical, physical and organisational measures necessary to ensure an appropriate level of security in relation to data processing.

We have set out the below physical, technical and organizational security measures in place to ensure the safety of personal data processing:

Physical security measures

- Keeping offices and storage units locked;
- Only authorised persons have access to personal data;
- Personal data are locked in the cabinets if the authorized person is away from his desk;
- Keeping server rooms or cabinets locked;
- Cabling desktop machines and laptops to desks;
- Implementing clean desk policies;
- Ensuring that shredders are in place and that they are functioning correctly;
- Ensuring that fire alarms are in place and that they are functioning correctly;
- Ensuring that ICT equipment such as hard drives and old laptops, computers and mobile devices are securely disposed of at end of life.
- Conducting periodical audits of the above measures

Technical security measures

- Ensuring that all computing devices such as PCs, mobile phones, and tablets are using an up-to-date operating system;
- Encryption of data;
- Ensuring all computing devices are regularly updated with manufacturer's software and security patches;
- Using antivirus software on all devices;
- Implementing a strong firewall;
- Ensuring data backups are taken and are stored securely in a separate location;
- Ensuring that data backups are periodically reviewed and tested to ensure they are functioning correctly;
- Ensuring that data is collected and stored securely;
- Ensuring that two-factor authentication is enabled for remote access;
- Email disclaimer paragraph;

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Organisational security measures

- Communicating the importance of company data and all the measures they can take to protect it to employees;
- Conducting ongoing staff training on data protection;
- Documenting data collection and retention policies;
- Ensuring the use of strong passwords by having a password policy in place that is enforced;
- Ensuring remote access is supported by a remote access policy;
- Documenting data back-up policies;

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Officer.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Your personal data may be transferred to third countries [i.e. countries outside of the European Economic Area]. Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46.

Please contact our Data Protection Officer if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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7. Data security

We have put in place appropriate security measures (refer to section 4) 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 to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

We will keep your personal data for as long as we have a business relationship with you.

Once our business relationship with you has ended, we may keep your data for up to ten (10) years in accordance with the directive of the Data Protection Commissioner. We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. For more details please refer to ([http:// www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)).

For prospective employee or customer or supplier personal data we shall keep your personal data for 6 months from the date of notification of the rejection of your application, as per Data Protection Commissioner directive. For more details please refer to (<http:// www.dataprotection.gov.cy>).

In some circumstances you can ask us to delete your data and, in some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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9. Your data protection rights

You have the following rights in terms of your personal data we hold about you:

- **Receive access to your personal data.** This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a please contact our Data Protection Officer.
- **Request correction [rectification]** of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to erase your personal data [known as the ‘right to be forgotten’] where there is no good reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.
- You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling inasmuch as it is related to direct marketing.
- If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

Request the restriction of processing of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:

- It is not accurate,
- It has been used unlawfully but you do not wish for us to delete it,
- It is not relevant any more, but you want us to keep it for use in possible legal claims,
- You have already asked us to stop using your personal data but you are waiting us to confirm if we have legitimate grounds to use your data.

Request to receive a copy of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by ourselves to other organisations you will name [known as the right to data portability].

Withdraw the consent that you gave us with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

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To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact our Data Protection Manager at cm@ooc.com.cy

We endeavour to address all of your requests promptly.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Frequently asked questions

To help you understand the basic principles of Data Privacy Law and address some of the common questions that arise with regard to the protection of your personal data, please contact our Data Protection Officer at cm@ooc.com.cy.