

**This General Privacy Notice applies to all SCF Group of Companies that are established in the EU and act as controllers and/or established outside of EU and process personal data of data subjects who are residents in the EU.**

**DATA PROTECTION POLICY**

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## **WHO ARE WE?**

The SCF Group of Companies that are established in the EU and/or established outside of EU and process personal data of data subjects who are residents in the EU («SCF», «we», «us», «our») being members of PAO Sovcomflot which is Russia's largest shipping company (hereinafter referred to as the «SCF Group»), is one of the global leaders in the maritime transportation of hydrocarbons, as well as, the servicing and support of offshore exploration and oil & gas production with various companies within its group.

## **WHAT IS THE PURPOSE OF THIS DOCUMENT?**

SCF Group is committed to protecting the privacy and security of the personal information of its employees, directors, clients, potential clients, contractors, service providers, authorised parties, vendors, agents, business associates, third parties (the «data subjects», «you»).

This data protection policy describes how we collect and use personal information about you during and after the contractual, commercial or any other kind of relationship with us, in accordance with the General Data Protection Regulation («GDPR») any national implementing laws, regulations and secondary legislation to which the members of the SCF Group are subject («Data Protection Law»).

SCF Management Services (Cyprus) Ltd is the «data controller», ie the party holding overall responsibility of your personal data. This means that it is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this data protection policy.

This data protection policy applies to employees, directors, current and former clients, contractors, service providers, potential clients, authorised parties, vendors, agents, business associates, third parties. This data protection policy does not form part of any contract to provide services. We may update this data protection policy at any time.

It is important that you read this data protection policy, together with any other data protection policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## **DATA PROTECTION PRINCIPLES**

We will comply with data protection law. This provides that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **THE KIND OF PERSONAL INFORMATION WE HOLD ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you in our various departments:

**Identity data:** Job title, Name, Surname, Middle Name, Date/Place of Birth, Nationality, Sex, Civil Status, Religion, Height, weight, hair/eyes color, uniform/ shoes size Email, Address, Telephone and Mobile Number, Fax number as applicable to each data subject.

**Employment data:** data of candidates and existing and former employees (as applicable) and includes, depending on the location of the relevant data subject and the applicable laws

**Service Provider/contractors/agents data:** Full name, email address, address, telephone number of contact person

**Further identity data:** ID, Marital Status, date of birth, Passport Number, Social Security, National tax

**Financial and Credit Information:** Bank Account Number and IBAN

Certificate

We will hold some sensitive personal information of you and in particular:

**Information about your health** to the extent is required by applicable law.  
**Other Sensitive information:** certificate of clean criminal record where necessary.

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about the data subjects:

- (a) Directly from you
- (b) Through other sources:
  - a. Our vendors/service providers
  - b. Publicly available sources e.g. Department of Registrar of Companies, press and media, internet
  - c. Authorised Representatives e.g. Financial Institutions, Doctors and other medical service providers

## **HOW WE WILL USE INFORMATION ABOUT YOU**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
  - a. Provide our services to you
  - b. Processing applications
  - c. Communicate with you in relation to any queries/complaints with respect to our services.
  - d. Manage our internal business operations in relation to finance and accounting, billing, recovery and collection of debts, records management and auditing.
  - e. Enhance our services' quality standard
2. Where we need to comply with a legal obligation.

- a. Keep necessary data to comply with Tax, Anti-Money Laundering and Immigration Laws (including applicable laws outside your country of residence).
  - b. Comply with requests from Supervisory Authorities.
  - c. Comply with any law in or outside EU.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- a. Records Management
  - b. Maintaining technology infrastructure and support
  - c. Maintaining and building upon customer relationships
  - d. Improve the quality of our services.
  - e. Establish, enforce and defend legal rights to protect our business operations.
  - f. Identify, prevent and investigate fraud and other unlawful activities, unauthorised transactions, claims and other liabilities, and manage risk exposure and quality;
  - g. Manage our infrastructure, business operations and comply with internal policies and procedures;
  - h. Modify, personalise or otherwise improve our services/communications;
  - i. Defend, investigate or prosecute legal claims;
  - j. Receive professional advice (e.g. tax or legal advice);
  - k. Enhance the security of our network and information systems
4. Where you provided your consent.
- a. Where you provided sensitive personal information to us in order to comply with any applicable law.

***If you fail to provide personal information***

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you and for instance not be able to satisfy your claim, or we may be prevented from complying with our legal obligations or otherwise not be able to enter into or carry out any contractual relationship with you.

***Change of purpose***

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

«Special categories» of particularly sensitive personal information require a higher level of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. For compliance with any applicable law and/or regulation (regarding seafarers - as per the requirement of the flag state and the maritime regulatory framework in general).
2. We may process this type of information where it is needed in relation to any legal claims against us during civil or administrative court proceedings or during out-of court settlement negotiations.
3. Where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.
4. For reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud.
5. In limited circumstances, with your explicit consent.

## **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

## **AUTOMATED DECISION-MAKING**

We will not make any decision that would significantly affect you based solely on processing by automated means, including profiling, unless permitted by law and where we have taken measures to protect your legitimate interest.

If decision is made by automated means, you have the right to know the logic

involved in that decision making, as well as the significance and envisaged consequences of the processing.

## **DATA SHARING**

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EEA.

If we do, you can expect a similar degree of protection in respect of your personal information through contractual arrangements to observe confidentiality and data protection assuring they comply with data protection law and the GDPR.

### ***Why might you share my personal information with third parties?***

We will share your personal information with third parties where required by law, where it is necessary to administer the commercial relationship with you or where we have another legitimate interest in doing so.

### ***Which third-party service providers process my personal information?***

«Third parties» includes third-party service providers and other entities within our group.

The following third-party service providers process personal information about you so that we perform our obligations or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations:

1. Your legal representatives
2. Lawyers in Cyprus and abroad
3. Government Agencies & Bodies & Supervisory Authorities (e.g. Department of Road Transport, Police, Superintendent of Insurance)
4. Financial institutions
5. Doctors and other medical service providers
6. Auditors



7. File storage/archiving companies and record management companies and cloud storage companies
8. Data backup companies
9. Software Service providers we have chosen to support us in the effective provision of our products and services to you by offering technological expertise, solutions and support
10. Insurance Providers
11. Port Agents
12. Business Associates

***How secure is my information with third-party service providers?***

All our third-party service providers and all other third party entities, other than those which we are required under the law to disclose your personal information, are required to take appropriate security measures to protect your personal information in line with our policies and relevant contractual data sharing obligations. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions as per the GDPR.

**When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group for:

- Administration of your employment according to the Privacy Policy regarding employees.
- Administration of your recruitment according to the Privacy Policy regarding candidates.
- Business compliance with legal obligation such as preparation of mandatory reports for public authorities, dealing with legal disputes involving employees, including accidents at work, complying with health and safety obligations, to prevent fraud, to monitor the use of our information and communication systems to ensure compliance with our IT policies, to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution, Equal opportunities monitoring, monitoring the security of the office premises.
- Handling personal data in connection with duties as directors/officers and/or signatories to bank accounts and under certain circumstances

transferring such personal data to another entity of the group which may be outside of EEA for compliance with their own obligations whether legal, regulatory or otherwise. For the compliance of legal obligations such entities may transfer personal data to other entities outside of the group e.g. banks, clients etc.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of personal information.

### **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### ***Transferring information outside the EU***

We may transfer the personal information we collect about you to countries outside the EU in order to perform our contract with you, protect our legitimate interest or those of third parties and in particular share them with:

- (a) Travel Agents
- (b) File storage/archiving companies and record management companies
- (c) Government Agencies & Bodies
- (d) Software Service providers
- (e) Port Agents
- (f) Business Associates

Where there is not an adequacy decision by the European Commission in respect meaning your personal information are not deemed to be provided with an adequate level of protection for your personal information, we ensure that your personal information does receive an adequate level of protection by putting in place appropriate measures such as Standard Contractual Clauses or Binding Corporate Rules in order to safeguard that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and Cyprus laws on data protection.

## **DATA RETENTION**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Where our contractual relationship is terminated we will retain your personal information until at least all related limitation periods are elapsed in order to safeguard our interests from any legal claims but we may keep them for a longer period if deemed necessary.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further data protection policy to you. Once you are no longer in a commercial relationship with us we will retain and securely destroy your personal information in accordance with our data retention policy.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### ***Your duty to inform us of changes***

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

### ***Your rights in connection with personal information***

Subject to certain legal conditions, you may have the right to:

- **Request access** to your personal information (commonly known as a «data subject access request»). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

It is noted that in accordance with the legislation in force, your right to apply for the erasure of your personal data or to object to the processing of your personal data by SCF is not applicable or may be limited in the following instances where the processing of the data is carried out for the purpose of:

- a) establishing, exercising or supporting legal claims, and
- b) maintaining a legal obligation that necessitates the processing on the basis of Cypriot or European Law, to which SCF is subject.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

### ***No fee usually required***

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **RIGHT TO WITHDRAW CONSENT**

In the circumstance where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact DPO in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. It is also noted that the processing based on the consent carried out prior to the withdrawal will remain lawful.

In some occasions withdrawing or not providing your consent will have an impact on us for continuing the performance of our services to you.

### **DATA PROTECTION OFFICER**

We have appointed a data protection officer (DPO) to oversee compliance with this data protection policy. If you have any questions about this data protection policy or how we handle your personal information, please contact our DPO at

- e-mail: [dpo@scf-Group.com](mailto:dpo@scf-Group.com)
- phone: +357 2589-0154

You have the right to make a complaint at any time to the Data Protection Commissioner's Office, the Republic of Cyprus' supervisory authority, for data protection issues.

1 Iasonos Street,  
1082 Nicosia, Cyprus  
Tel.: +357 22 818 456

Fax: +357 22 304565

E-mail: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

or with the Supervisory Authority appropriate to the place where you normally live or work in the EU or any other place in the EU where you believe your personal data have been processed in violation of the Data Protection Laws.

### **CHANGES TO THIS DATA PROTECTION POLICY**

We reserve the right to update this data protection policy at any time, and we will provide you with a new data protection policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this data protection policy, please contact our DPO.**