

 FURTRANS TANKER & SHIP MANAGEMENT Document may not be disclosed to any third party without the prior approval of the management.	Company Policy		Page: of:
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Pursuant to 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) **the Company Furtrans Tanker & Ship Management** (collectively referred to "FTSM", "we", "us") provides the following information to enable users of the ftsm.it website to understand how their personal information is collected and processed when browsing the Website and using the services provided through it.

The term "personal data" (data) refers to all information that can be used to determine who you are, for example your name, your email address, IP address and identity number.

Responsible body and Data Protection Officer

Furtrans Tanker & Ship Management Srl is the data controller and therefore responsible for collection and processing of your personal data. The physical address is Genova, Salita di Santa Caterina 10/6.

The Company has appointed a Data Protection Officer (**DPO**), who can be contacted at the following e-mail address dpo@ftsm.it.

Personal data processing

At FTSM, we respect your privacy and value the trust which you place in us. As a result, we will only process your data when we have a valid reason do so. Our lawful reason for processing your personal data will most commonly include:

1. Performance of a contract, which includes processing of personal data required to enter into a contract with you or the organisation for whom you work, alternatively for purposes of concluding a contract of employment with you and/or the conducting of pre-contractual measures including but not limited to, background checks and assessing your fitness and suitability for the position applied for at FTSM;
2. Compliance with a legal obligation placed on FTSM;
3. Where it is necessary for our legitimate interests (or those of a third party) and your privacy right(s) do not override those interests;
4. We may also use your personal data in the following situations, which are likely to be rare:
 - a. where we need to protect your (or someone else's) interests, or
 - b. where it is necessary in the public interest or for official purposes;
5. Under limited circumstances we may also process your personal data based on your consent; and
6. Operational reasons that include access control, investigations and access permit/card process (screening) when visiting any FTSM premises or fleet vessels.

FTSM collects, uses and allows access to your personal data in accordance with the laws pertaining to privacy and data protection.

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, that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you (by means of direct communication to you, a revised privacy statement or other appropriate means) and we will explain the legal basis which allows us to do so.

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Personal data holding

Based on the personal data processing above, we may collect, store, and use the following categories of personal data about you:

1. basic information, such as your name, your employer, your title or position and your relationship to a person;
2. contact information, such as your physical address, email address and phone number(s);
3. financial information, such as bank account details;
4. technical information (including your IP address), such as information from your visits to our website or any applications or in relation to materials and communications we send to you electronically;
5. information you provide to us for the purposes of attending meetings and events, including access and dietary requirements;
6. information you provide to us when answering any surveys you may participate in, for example, our customer satisfaction surveys;
7. identification and background information provided by you or collected by us as part of our business acceptance processes;
8. identification and background information collected or generated by us as part of our conflict-of-interest management processes (including gift, entertainment and hospitality declaration processes);
9. identification, background and employment information, professional experience and affiliations, and medical and health information as part of your application for employment with FTSM;
10. personal data provided to us by or on behalf of our clients or generated by us in the course of providing services which may include "Special categories" of data;
11. details of your visits to any of Company premises or fleet vessels;
12. publicly available information in order to facilitate our business dealings with you or your employer; and
13. any other information relating to you which you may provide to us.

Personal data belonging to "Special categories"

"Special categories" of particularly sensitive personal data are afforded higher levels of protection. Reference to Special categories of data includes race or ethnic origin, trade union membership, political persuasion, health or medical information and criminal behaviour.

We will only collect, store and/or use your personal data which falls within this category, if we have a valid justification for processing. As required by applicable law(s), we have appropriate policies and safeguards in place, when processing these categories of information.

We may process special categories of personal data under the following justifications:

1. in limited circumstances, with your explicit written consent;
2. where we need to carry out our legal obligations or exercise rights in connection with any contract we may have with you or the organisation for whom you work; or
3. where it is needed in the public interest.

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Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your (or someone else's) interests and you are not capable of giving your consent, or where you have already made the information public.

Data sharing

Where appropriate, before disclosing personal data to a third party, we shall contractually mandate the third party to take adequate precautions to protect that data and to comply with applicable law.

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 and applicable legal requirements.

The transfer of personal data outside the EU

We may transfer your data abroad to companies located outside the European Economic Area (EEA) to perform any contract that we may have with you or for other legitimate reasons. Some of the jurisdictions outside the EEA may not provide the same level of data protection as that which is guaranteed within the EEA. In such a case, we will ensure that appropriate safeguards are applied to the transfer of such personal data with the utmost confidentiality by adopting the standard contractual clauses provided by the European Commission and any other necessary measures referred to in Art. 46 GDPR where it would not be possible to resort to one of the exceptions referred to in Art. 49 GDPR.

Data security

FTSM strives to secure the confidentiality, integrity and availability of your personal data by taking appropriate and reasonable, technical and organisational measures to prevent loss of, damage to, unauthorised use or destruction, and unlawful access to, or processing of your personal data. To this extent, we have due regard to generally accepted information security practices and procedures, and a dedicated information security team, which constantly reviews and improves our personal data security measures.

We endeavour to secure your personal data stored on FTSM information systems and held in hard copy. Personal data contained in hard copy (paper) format is kept secure and safe in warehouses or lockable cupboards.

Data retention period

Data shall be processed using computer-based (including where necessary, electronic forms) and paper-based tools, for the time strictly necessary to achieve the purposes for which they were collected and in compliance with the rules on personal data protection, including those concerning data security, to prevent data loss, illicit or incorrect use and unauthorized access.

The Personal Data may be kept for longer in the event of a possible litigation, requests by competent authorities or as per the applicable law.

Once we no longer have a lawful basis to process your personal data, we will securely destroy your personal data in accordance with our records management policies and applicable laws.

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Purpose of data processing

The personal data is processed to:

- fulfil obligations imposed by the applicable regulations and complying with requests from the public authorities;
- to follow up on user requests for the Services. For the aforementioned purpose, personal data will also be processed within the context of the administration and management of the Services, support, as well as to comply with the obligations arising, as well as to fulfil specific user requests;
- for sending informational services and initiatives of the data controller or third parties via email;
- to conduct analysis of the use of the Services on an aggregate basis in order to improve the Services provided and meet specific user needs;
- to ascertain, exercise, defend a right of the data controller and/or a third party including in court.

Visiting Company's website

If you visit our websites, your browser automatically transmits the following data:

- Date, time and duration of the time you have spent viewing a page
- Name of your Internet Service Provider
- The referring website
- The IP (Internet Protocol) address of your device / workstation / computer
- Your internet browser type and version
- The operating system of your device / workstation / computer

Cookies

When you visit our website, we collect data with the help of cookies. Cookies are small text files that are stored on your device. Cookies usually contain a cookie ID i.e., a unique identification feature that can be used to identify your device.

Depending on the kind of the cookie, different data is collected and processed.

Our website uses Analysis cookies: With the help of these cookies, we track your user behaviour when you use our websites, e.g., which parts of the websites you use and how often you visit our websites. We use first party cookies only.

Link to FTSM media pages

FTSM has links to its various Social media pages. If you visit these platforms, the privacy policy / notice / statement and terms and conditions of the specific platform apply.

Direct contacting us

When you contact us via a contact form, via email or phone, we process the personal data you communicate to us, The data will be stored in a FTSM repository. The data marked as mandatory has to be provided in order to action your request. Refusal to provide certain information may result in FTSM being unable to action your request.

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User rights and duties

1. Privacy a fundamental right

At FTSM we respect your fundamental right to Privacy. Your trust and confidence is of paramount importance to us. Please see your privacy rights below, relating to the use of your personal data which may be exercised under certain circumstances.

- a. **Right to withdraw your consent:** You may withdraw your consent to the processing of your personal data at any time. Please note that the revocation does not affect the legality of the data processed thus far. However, we may be obliged by law to retain your personal data despite the withdrawal of your consent. As far as we process personal data for direct marketing purposes you have the right to object at any time.
- b. **Right to object:** You may 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.
- c. **Right to access:** This right enables you to access the personal data we hold about you and to check that we are lawfully processing it.
- d. **Right to correction:** The right enables you to have any incomplete or inaccurate information we hold about you corrected.
- e. **Right to data portability:** Under certain circumstances you may have the right to request the facilitation of a transfer of your personal data to another party.
- f. **Right to Deletion:** This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing.

2. Your Duties

As the party responsible for the lawful processing and security of your personal data, we endeavour to treat your personal data according to this privacy policy, applicable law and international best practice. In order to facilitate the protection of your personal data, you have the following duties:

- duty to inform us when there are changes to your personal data;
- duty to safeguard your personal data; and
- duty confirm your identity in order to action your rights.

Right to contact a supervisory authority

You can file a claim with the respective data privacy supervisory authorities if you believe that our data processing does not meet the legal requirements, or we did not facilitate the exercise of your rights accordingly. Contact details for your local data protection regulator can be found on the internet, as follows:

- https://edpb.europa.eu/about-edpb/about-edpb/members_en

CEO
Hasan Can Şehirli

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