

PRIVACY POLICY

1. Our commitment

Compliance with the law on the protection of personal data and respect for the rights of data subjects' personal data is a priority for us.

2. The data controller and the Data Protection Officer

Agência Marítima Euronave (Porto), Lda., with registered office at Rua Mouzinho de Albuquerque 13,5º, 4450-204 Matosinhos, Portugal, with the single registration and legal person number 500010692 (hereinafter referred to as Euronave), collects and processes the personal data of its customers consisting of natural persons, as well as the personal data of the customers, natural persons, of its customers, to whom a particular consignment is addressed. Euronave is not legally obliged to appoint a Data Protection Officer.

3. Personal data, personal data subjects and categories of personal data

Personal data means, according to the Regulation, information relating to an identified or identifiable natural person ("data subject"). An identifiable person is considered to be a natural person who is, directly or indirectly, identifiable in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Examples of personal data collected:

Identification data	Examples
Identification and contacts	Name, tax identification number, address, e-mail address, telephone number
Financial data	Billing address; bank account number; credit or debit card numbers; name and information of holders of bank account or bank cards
Services	Products and/or services purchased
Electronic identification data	Cookies or similar technologies and activity logs

These personal data are provided to us directly by the data subject or through a third party, generally in order to implement contracts relating to the carriage of goods.

4. Basis, Purposes and Duration of the Processing of Personal Data

The data provided by customers are processed with the following purposes: provision of contracted services in the performance of our business activity; customer management, accounting, tax and administrative management; management of litigation; network and systems management; control of information security and physical security; compliance with legal obligations and marketing and sales. The processing of data for marketing purposes will be carried out according to the consent option indicated by the customer.

5. What is the period for which the personal data will be stored?

The personal data of customers are stored for the period necessary for provision of the services, billing and compliance with applicable legal obligations. Accordingly, there are different retention periods depending on the purpose for which the data are intended. In all cases, Euronave complies with the principles of need and of minimisation of the storage time.

6. Rights of the personal data subject

The data subject has the right to access, rectification, cancellation and objection:

a) The right of **access** consists in knowing whether your data are being processed, the purposes, the recipients (in particular in the case of transfer to third countries), the period for storage, the existence of the right to request rectification, deletion or limitation of the processing of the data subject's personal data from the data controller, or the right to object to such processing, and in relation to which it may file a complaint with a supervisory authority.

b) The right of **rectification** means the subject has the right to ensure, without undue delay, the rectification of inaccurate personal data concerning him or her. As regards the purpose of the processing, the data subject has the right to complete any of his or hers incomplete personal data, including by means of an additional declaration.

c) The right to **cancellation** (also known as 'deletion' or 'oblivion') means that in the certain circumstances specified in the GDPR, the subject has the right to ensure that the controller erases his or her personal data without undue delay and the controller is obliged to erase the personal data without undue delay.

d) The right of **objection** means that the data subject has the right to object at any time, for reasons relating to his or her specific situation, to the processing of his or her personal data which is based on legitimate interests or a public interest. The controller shall cease processing the personal data unless it submits overriding and legitimate reasons for such processing which prevail over the interests, rights and freedoms of the data subject, or for the purposes of declaration, exercise or defence of a right in judicial proceedings.

The data subject has **the right to withdraw his or her consent at any time**. Withdrawal of consent does not compromise the lawful processing already occurred on the basis of consent previously given.

The data subject has the right not to be subject to any decision made solely on the basis of automated processing, including the definition of profiles.

The data subject has the right to receive the personal data concerning him or her, and which had been provided to a data controller, in a structured, updated and automatic reading format. The subject also has the right to transfer this data to another data controller without the controller to whom the personal data had been supplied being able to prevent this, if: (a) the processing is based on the consent given under Article 6(1)(a) or Article 9(2)(a) or in a contract referred to in Article 6 (1)(b); and (b) the processing is performed by automated means. In exercising his or her right to portability of data, the data subject has the right to have the personal data transferred directly between those responsible for the processing, whenever this is technically possible.

7. Personal data breach

In the case of a personal data breach that may entail a high risk for the rights and freedoms of the data subject, the data subject has the right to be informed of the personal data breach.

8. Complaint to a supervisory authority

The data subject has the right to complain to the national supervisory authority. In Portugal, this is the National Data Protection Authority (CNPD). The contacts of the CNPD are as follows:

- Address: Rua de São Bento, n.º 148 - 3.º, 1200-821 Lisbon
- Telephone (+351) 213928400
- Fax: +351 21 397 68 32
- Private Line: +351 21 393 00
- E-mail: geral@cnpd.pt

9. Exercise the rights under the GDPR

In order to exercise any of your rights above, you may send an e-mail to the following address: euronave@euronave.pt, or communication by any other means, with subject GDPR or Data Protection. We promise to reply to your request within 30 days. If it is necessary to extend this deadline, we will inform the data subject in writing.

The provision of information and the exercise of rights are free of charge. However, if the requests submitted by a data subject are manifestly unfounded or excessive, in particular because of their repetitive nature, the controller may require payment of a reasonable fee taking into account the administrative costs of providing the information or communication, or with taking the requested measures; or it may refuse to comply with the request.

10. How do we protect your data - technical and organisational measures

Taking into account the nature, scope, context and purpose of data processing, as well as the risks to the rights and freedoms of natural persons, Euronave has implemented and maintains technical and organisational measures which are appropriate to ensure and demonstrate that the processing is carried out in accordance with this Regulation. Thus, to protect the personal data subject to processing, Euronave has implemented and performs the following measures:

- a) the use of anti-virus, firewalls and intruder detection systems;
- b) access control and traceability system based on authentication;
- c) physical security measures, such as the control of access to premises, locked cabinets;
- d) Pseudonymisation and data encryption;

11. Cookie Policy

Cookies are a tool used by Web servers to store and retrieve information about their visitors. They consist of a unique identifier in the form of a text file that some servers send to the user's device to record information about what the user has been doing on their pages, thus improving the quality and security of the web page. They have an expiry date that can range from the time the session lasts until a specified future date from which they are no longer operational. Cookies collect generic information, such as how users arrive and use the sites or the zone of the country/countries through which they access the site, etc. Cookies only retain information related to your preferences. You may allow, block or delete the cookies installed on your device at any time by configuring this in your Internet browser options.