**PRIVACY POLICY**

Stove Shipping Group is a provider of ship management services.

In connection with our services we collect and process personal data concerning data subjects. This privacy policy describes how COMPANY collects, process and disclose your personal data and for what purposes, as well as your rights related to COMPANY’s processing. COMPANY will process your personal data in accordance with the privacy rules applicable at any time.

# Contact information

COMPANY is the data controller for your personal data processed in relation to the COMPANY webpage, etc.

If you have any questions regarding our processing of personal data or about this privacy policy, you may contact Anne Christin Reithe Christensen by email: [anne.christensen@easternbulk.com](mailto:anne.christensen@easternbulk.com)

# personal data, purpose and legal basis for processing

COMPANY process' personal data relating to contact persons at its customers, service providers and business partners, potential candidates and others who contact COMPANY or visits our webpage. The personal data may be provided by the data subject itself, from publicly accessible sources or third parties such as service providers, partners etc.

We may process your personal data in connection with the following processing activities:

* ***Contract management:*** In connection with the administration and management of contracts with COMPANY’s customers, business partners etc., COMPANY may process personal data such as contact information of contact persons at such customers, business partners etc. COMPANY processes such personal data based on our legitimate interests in fulfilling our contractual obligations and rights.
* ***Respond to inquiries:*** COMPANY may process personal data in order to follow-up inquiries from potential candidates, website users, and others who contact COMPANY. COMPANY may process personal data such as contact information and other personal data provided in connection with the inquiry. The legal basis for such processing is COMPANY’s legitimate interest in providing support to its users.
* ***Use of the COMPANY website:*** COMPANY may process personal data about visitors to the COMPANY website. COMPANY use cookies and other information gathering methods to enhance the user experience and optimize the COMPANY website. The legal basis for such processing is COMPANY’s legitimate interest in maintaining the webpage and collect statistics. You can read more about our use of cookies in our Cookie Policy: <http://www.stoveshipping.com/>
* ***Marketing, newsletters etc.;*** If you have signed up for marketing or our newsletter, we may process your name, contact information etc. in order to submit such materials to you. Such processing is based on your consent.
* ***Recruitment:*** If you apply to a position in COMPANY, COMPANY may process your personal data in order to assess your application. The legal basis for such processing is that it is necessary in order to take steps at the request of the candidate prior to (potentially) entering into an employment contract. Applications will normally be stored for 1 year after the completion of the application process, unless you consent to further storage.
* ***Ensure compliance and legitimate interests:*** COMPANY may also process personal data in order to comply with statutory obligations to which COMPANY is subject, and to safeguard own or third parties’ legitimate interests, e.g. in relation to establishing a legal claim or preventing unauthorised access to or disclosure of personal data.

# Retention period

COMPANY will retain your personal data for as long as it is necessary to fulfil the purposes for processing as defined above. Please note that continued storage may be necessary due to statutory obligations to which COMPANY is subject, e.g statutory rules related to storage for accounting purposes, or due to COMPANY’s legitimate interests, e.g. for the purpose to establish, exercise or defend a legal claim.

# PROTECTion for your data

We protect the quality and integrity of personal data and have implemented appropriate technical and organisational measures to do so. We have implemented security policies, rules and technical measures to protect the personal data that we have under our control from loss, alterations, theft and unauthorized access.

# Disclosure to third parties

We will only disclose your personal data to third parties to the extent we have a legal basis for such disclosure.

We use data processors to collect, store and otherwise process personal data on our behalf. The relationship to such suppliers is governed by a data processor agreement, which inter alia ensures information security for your personal data.

COMPANY may process and store your personal data outside the EU/EEA. All processing in a third country will be subject to mechanisms ensuring sufficient security for your personal data, such as EU Standard Contractual Clauses, an adequacy decision from the EU Commission or a Privacy Shield certification.

# third party websites and social media

COMPANY’s websites may include links to other third-party sites. These third-party sites have own privacy policies that determines how personal data are collected and processed. If you submit personal information to any of these third-party sites, your information is governed by their privacy policies. COMPANY takes no responsibility for such third-party sites, how they are operated and how they process your personal data. We recommend that you familiarise yourself with such third-party sites' privacy policies and terms of use when visiting and using such sites.

When you "like" or join our Facebook page or other social media accounts, this will be shared with the relevant platform. The same applies to any activities on our social media accounts, such as content posted by you or posts that you like. The relevant social media platform has own privacy policies, in which you can find more information about the processing of personal data in relation to such social media platforms.

# Your rights

When COMPANY process your personal data, you have the following rights:

* You may at any time request access to your personal data.
* If the processing is based on your consent or agreement with you, you have the right to data portability.
* If your data is processed based on your consent, you may withdraw your consent any time.
* In some circumstances you may request restriction of processing or object to further processing of your personal data.
* If personal data that we process about you are inaccurate, you may request rectification of your personal data.
* In some circumstances you may request erasure of your personal data, for example when the personal data are no longer necessary for the purposes for which they were collected, and COMPANY has no other legal basis for continued processing.
* You may at any time lodge a complaint with a supervisory authority if you believe that COMPANY’s processing of your personal data are contrary to relevant data protection laws.

If you want to exercise your rights, you may contact COMPANY via the contact information set out in section 1 above.

Please be advised that the use of several of COMPANY’s services are dependent on processing of certain information regarding the users, and that a withdrawal of consent, objection towards processing etc. will entail that you may no longer use such services.

# changes to the privacy policy

If COMPANY makes changes in the processing of personal data, this policy will be updated, and the change will be notified on the webpage or by use of your contact information.

Last updated: 30 January 2020