

PRIVACY NOTICE

Introduction

This General Privacy Notice explains what we do with your personal data.

It applies to any Employees (Office Staff), Contractors and Group Company Employees of whom we process personal data.

It describes how we collect, handle, and process your personal data.

The Data Controller

Columbia Shipmanagement Limited (CSM) is the controller for the personal data it processes. You can contact CSM in a number of ways, which are set out below:

Columbia Shipmanagement Limited

Address: Columbia House, 21 Spyrou Kyprianou Avenue, 4042 Limassol, Cyprus

Phone: +357 25843100

The Data Protection Officer (DPO)

If you wish to contact our Data Protection Officer in relation to the processing of your personal data by CSM, you can do so in a number of ways, which are set out below:

Mr Andreas Andreou

Address: Columbia House, 21 Spyrou Kyprianou Avenue, 4042 Limassol, Cyprus

Phone: +357 25843100

Email: csmdpo@csmcy.com

Vendors Invoice Processing Management

Data Subject

This section applies to the personal data of Employees (Office Staff), Contractors and Group Company Employees.

Purpose of Processing

Where you provide us or we are provided with your personal data from any of our Group Companies, we will process them for payment processing purposes only.

Categories of personal data

This includes your personal identification details, contact information and user account information.

Legal Basis

The legal basis we rely on to process your personal data is GDPR Article 6(1)(f). This allows us to process personal data when it is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Legitimate interests

The legitimate interests pursued are internal administration purposes.

PD required by law (statutory) or by contract or necessary to enter into a contract and the possible consequences of failure to provide same

If necessary personal data is not provided, we shall not be able to conduct the required payment processing as a user portal shall not be created.

Recipients

There are no recipients of your personal data for these purposes.

Retention Period

We will store such personal data for a period until account inactivity, or 7 years, whichever is earlier, after which the user accounts shall be deactivated and any personal data shall be deleted or anonymized.

Data Subject Rights

We shall respond without undue delay to requests made by Data Subjects to exercise their rights in relation to the personal data we process.

Under certain circumstances, data subjects have certain rights, including:

Access

The data subject has the right to obtain the following from the Company:

- a) Confirmation that the Company is processing their personal data;
- b) Copy of their personal data;
- c) Other supplementary information which is already included in the Company's General Privacy Notice

Rectification

Where personal data is inaccurate, the data subject has the right to request that it be corrected and incomplete personal data be completed based on information they may provide.

Erasure

The right to erasure is also known as "the right to be forgotten". It applies only in certain circumstances.

Restriction on Processing

The data subject may request from the Company the restriction of processing of their personal data.

Object to Processing

The data subject has the right to object to the processing of their personal data in some circumstances. However, data subjects have the absolute right to object to the processing of their personal data for direct marketing purposes.

Portability

Under certain circumstances, the data subjects have the right to receive personal data in a structured, commonly used and machine-readable format. This allows data subjects to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.

Right to withdraw consent if processing is based on consent

Where the legal basis for processing is the consent of the data subject, the GDPR entitles data subjects to the right to withdraw their consent at any time.

Right to lodge a complaint with a supervisory authority

Data subjects have the right to complain if they have concerns about the way the Company is handling their personal data.

Automated decision making

The data subject has the right not to be subject to a decision which is based on automated decision making or profiling, without the involvement of human intervention.

We do not use automated decision making.

How do I exercise my rights?

If you wish to contact our Data Protection Officer, you can do so in the ways set out in the relevant section at the beginning of this notice.

Changes to the General Privacy Notice

If any changes are made to the General Privacy Notice, a revised General Privacy Notice shall be provided to you.

Where we intend to further process your personal data for a purpose other than that for which the personal data were collected, we shall provide you, prior to that further processing, with information on that other purpose and with any relevant further information.