



## Privacy Policy

Your privacy is very important to us. We have developed this Privacy Policy in order for you to understand how we collect, use, store, share, transmit, transfer, delete or otherwise process (collectively “process”) your Personal data. This Privacy Policy describes the measures we take to ensure the protection of your Personal data. We also tell you how you can reach us to answer any questions you may have about data protection.

### SCOPE

The Privacy Policy applies to the global organization of Seven Seas entities (hereinafter designated as “Seven Seas”) for all dimensions and activities, in all geographies where we operate.

This policy applies to the Processing of Personal data collected by Seven Seas, directly or indirectly, from all individuals including, but not limited to Seven Seas’ current, past or prospective job applicants, employees, clients, consumers, children, suppliers/vendors, contractors/subcontractors, shareholders or any third parties, with “Personal data” being defined as any data that relates to an identified or identifiable individual or a person who may be identified by means reasonably likely to be used.

In this Policy, “you” and “your” means any covered individual. “We”, “us”, “our” and “Seven Seas” means the global organization of Seven Seas entities.

### COMPLIANCE WITH THE EUROPEAN DATA PROTECTION LAW AND ANY ADDITIONAL APPLICABLE DATA PROTECTION LOCAL LAW

We are committed to complying with any applicable legislation relating to Personal data and we shall ensure that Personal data is collected and processed in accordance with provisions of the European data protection law (GDPR) and other applicable local law, if any.

### LAWFULNESS, FAIRNESS AND TRANSPARENCY

We do not collect or process Personal data without having a lawful reason to do so. We may have to collect and process your Personal data where necessary for the performance of a contract to which you are party, or when it is necessary for compliance with a legal obligation to which we are subject or where required, with your prior consent. We may also collect and process your Personal data for Seven Seas’ legitimate interests except where such interests are overridden by your interests or fundamental rights and freedoms.

When collecting and processing your Personal data, we will provide you with a fair and full information notice or privacy statement about who is responsible for the processing of your Personal data, for what purposes your Personal data are processed, who the recipients are, what your rights are and how to exercise them, etc., unless it is impossible, or it requires disproportionate efforts to do so.



When required by applicable law, we will seek your prior consent (e.g. before collecting any Sensitive Personal data).

#### LEGITIMATE PURPOSE, LIMITATION AND DATA MINIMIZATION

Your Personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

When Seven Seas acts for its own purposes, your Personal data is processed mainly for, but not limited to, the following purposes: recruitment management, human resources management, accounting and financial management, finance, treasury and tax management, risk management, management of employees' safety, provision of IT tools or internal websites and any other digital solutions or collaborative platforms, IT support management, health and safety management, information security management, client relationship management, bids, sales and marketing management, supply management, internal and external communication and events management, compliance with anti-money laundering obligations or any other legal requirements, data analytics operations, legal corporate management and implementation of compliance processes.

When providing our services for the benefit of our clients or between us, we may also process Personal data on behalf of a Controller (either a client or any other Seven Seas entity acting as such) essentially for the effective operation, management, performance, and delivery of our services across the globe. We will ensure that Personal data processed is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

#### DATA ACCURACY AND STORAGE LIMITATION

Seven Seas will keep Personal data that is processed accurate and, where necessary, up to date. Also, we only keep Personal data for as long as necessary for the purposes for which it is processed (in accordance with our Global Data Retention Policy). Seven Seas will act upon the instructions of its clients in order to assist them in complying with this obligation.

#### SECURITY OF YOUR PERSONAL DATA

We implement appropriate technical and organizational measures to protect Personal data against accidental or unlawful alteration or loss, or from unauthorized, use, disclosure or access, in accordance with our Group Information Security Policy.

We take, when appropriate, all reasonable measures based on Privacy by design and Privacy by default principles to implement the necessary safeguards and protect the Processing of Personal data. We also carry out, depending on the level of risk raised by the processing, a Privacy impact assessment to adopt appropriate safeguards and ensure the protection of the Personal data. We also provide additional security safeguards for data considered to be Sensitive Personal data.



#### DISCLOSURE OF YOUR PERSONAL DATA

We can, in the usual course of our business and for the purposes of the processing, share your Personal data with the relevant personnel within the Seven Seas Group, or with our duly authorized suppliers/vendors, contractors/subcontractors, to ensure consistency in our employment activities, maximize the quality and efficiency of our services and our business operations.

We may also be obliged to disclose Personal data to regulatory authorities, courts, and government agencies where required by law, regulation or legal process, or to defend the interests, rights or property of Seven Seas or related third parties.

Otherwise, we will not share your Personal data with other parties unless you request it or have given us prior approval to such sharing.

#### INTERNATIONAL PERSONAL DATA TRANSFERS

European data protection law does not allow the transfer of Personal data to countries outside UE/EEA that do not ensure an adequate level of data protection. Some of the countries in which Seven Seas operates are not regarded by European Supervisory authorities as providing an adequate level of protection for individuals' data privacy rights.

For transfers of your Personal data to such countries, either to entities within or outside the Seven Seas Group, Seven Seas has put in place another adequate safeguard to protect your Personal data. You will be provided with more information about any transfer of your Personal data outside of Europe at the time of the collection of your Personal data through appropriate privacy statements.

#### COOKIES

Like many companies, our site may use "cookies." Cookies are portions of text that are placed on your computer's hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify features in which you may have the greatest interest. Cookies may enhance your online experience by saving your preferences while you are visiting a website.

We will let you know when you visit our website what types of cookies we use and how to disable such cookies. When required by law, you will have the ability to visit our website and refuse the use of cookies at any time on your computer.

#### YOUR RIGHTS

Seven Seas is committed to ensure protection of your rights under applicable laws. You will find below a table summarizing your different rights:



#### Right of access

You can request access to your Personal data. You may also request rectification of inaccurate Personal data, or to have incomplete Personal data completed.

You can request any available information as to the source of the Personal data, and you may also request a copy of your Personal data being processed by Seven Seas.

#### Right to be forgotten

Your right to be forgotten entitles you to request the erasure of your Personal data in cases where:

- i. the data is no longer necessary;
- ii. you choose to withdraw your consent;
- iii. you object to the processing of your Personal data by automated means using technical specifications;
- iv. your Personal data has been unlawfully processed;
- v. there is a legal obligation to erase your Personal data;
- vi. erasure is required to ensure compliance with applicable laws.

#### Right to restriction of processing

You may request that processing of your Personal data be restricted in the cases where:

- i. you contest the accuracy of the Personal data;
- ii. Seven Seas no longer needs the Personal data, for the purposes of the processing;
- iii. you have objected to processing for legitimate reasons.

#### Right to data portability

You can request, where applicable, the portability of your Personal data that you have provided to Seven Seas, in a structured, commonly used, and machine-readable format you have the right to transmit this data to another Controller without hindrance from Seven Seas where:

- (a) the processing of your Personal data is based on consent or on a contract; and
- (b) the processing is carried out by automated means.

You can also request that your Personal data be transmitted to a third party of your choice (where technically feasible).

#### Right to object to processing for the purposes of direct marketing

You may object (i.e. exercise your right to “opt-out”) to the processing of your Personal data particularly in relation to profiling or to marketing communications. When we process your Personal data on the basis of your consent, you can withdraw your consent at any time.

#### Right not to be subject to automated decisions



You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal affect upon you or significantly affects you.

#### Right to lodge a complaint to the competent Supervisory Authority

If you have a privacy-related complaint against us, you should contact us to complain. If you are dissatisfied with our response, you may then seek further recourse by contacting the relevant local Supervisory Authority or the local competent court.

To exercise these rights, you can send your Request or Complaint by following the procedure set out in the privacy statements brought to your attention at the time of the collection of your Personal data or by sending an email to the Local Special Point of Contact or to Global Data Protection Office at the following email address: [info@sevenseasgroup.com](mailto:info@sevenseasgroup.com)

#### CHILDREN

Children are entitled to specific protection with regard to their Personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the Processing of Personal data. Such specific protection should, in particular, apply to the use of Personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child.

We do not collect and process Children's Personal data without the consent of the holder of parental responsibility where required. In particular, we do not promote or market our services to Children, except for specific services and upon the consent of the holder of parental responsibility. If you believe that we have mistakenly collected a Children's Personal data, please notify us using the contact details provided below.

#### UPDATE

We may update this Privacy Policy from time to time as our business changes or legal requirements change. If we make any significant changes to this policy, we will post a notice on our website when the changes go into effect, and where appropriate, send a direct communication to you about the change.

#### CONTACT US

If you have questions about the collection and the processing of your Personal data by Seven Seas, you can send your questions or complaints at the following email address: [info@sevenseasgroup.com](mailto:info@sevenseasgroup.com)