PRIVACY POLICY

MARINE SERVICES GROUP

PURPOSE AND SCOPE OF THE PRIVACY POLICY

1.1. Privacy Policy (hereinafter the Policy) describes and provides information to the identifiable individuals (hereinafter the Data Subject) on how the Controller processes personal data of the Data Subject if the Data Subject has decided to visit the Controller's websites, to contact the Controller by using the specified telephone numbers or other online forms (e-mail, phone), or visit the events organised or supported by the Controller.

1.2. In this Policy, the Controller has described the measures that ensure the protection of interests and freedoms of the Data Subject by simultaneously ensuring that the data are processed in good faith, legally and in a manner transparent for the Data Subject.

1.3. The Policy applies to the processing of personal data, regardless of the form and/or the environment in which the individual provides personal data (by entering the territory and/or premises, by telephone, verbally, etc.) and in which systems of the Controller (video, audio, web, etc.) they are processed.

1.4. If this Policy is updated, the changes will be published on the Controller's website, in the section **Privacy Policy**. Changes to this Policy shall enter into force on the dates specified in notices regarding changes to this Policy.

THE CONTROLLER

2.1. Personal data processing shall be carried out by the companies within Marine Services Group:
- Marine Insurance Services SIA, reg. No. 40003693065, 4a Baznīcas Street, Riga, LV-1010, Latvia;
- Marine Legal Services SIA, reg. No. 50003932671, 4a Baznīcas Street, Riga, LV-1010, Latvia;
- Marine Shipsale Services SIA, reg. No. 40103608826, 4a Baznīcas Street, Riga, LV-1010, Latvia;
- Inter Survey SIA, reg. No 40103169281, 4a Baznīcas Street, Riga, LV-1010, Latvia;
- SIA Mūsu Domīnija, reg. No. 40003774934, 4a Baznīcas Street, Riga, LV-1010, Latvia

as joint controllers within human resource and marketing, accounting, security control, and as separate controllers within provision of professional services to clients.

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E-mail address: info@marineservices.lv
Websites: www.marineservices.lv; www.epolise24.lv; www.marineshipsale.com

APPLICABLE LAWS AND REGULATIONS

3.1. 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) (hereinafter the Regulation).

3.2. Other laws and regulations applicable in the area of personal data processing and protection.

PURPOSES OF PERSONAL DATA PROCESSING

4.1. Controller's purposes for use of personal data:
1) Data storage in the accounting and service ordering record-keeping systems to ensure accurate service provision, performance of contractual obligations and respecting the legitimate interests of the Controller;
2) Documentation of events organised by the Controller and its partners, including contact information of participants, in order to ensure the progress of the event and storage and publication of photo and/or video archives with the aim of promoting awareness of the Controller and the brands represented by it;

3) Preservation and records of incoming and outgoing communications (emails, letters by mail) to ensure the performance of contractual obligations and respecting the legitimate interests of the Controller;
4) The Controller shall analyse the visiting history of the website www.marineservices.lv to carry out market research and analyse opinions of the data subjects by using cookies;
5) Informing customers, potential customers and cooperation partners on the social media platform;
6) Informing customers, potential customers and cooperation partners about the news of the Controller's operations and special offers (e-mail addresses, phone numbers) in order to ensure respecting of the legitimate interests of the Controller;
7) Receiving data for the purpose of conclusion of agreements, fulfilment of agreements and provision of services;
8) Receiving data for requesting quotations and issuing received quotations to data subjects.

4.2. Upon processing personal data for purposes other than those specified herein, the Controller shall notify the individual conditions for their processing to the data subject individually, subject to the conditions of Article 13 and/or 14 of the Regulation.

WHAT PERSONAL DATA ARE PROCESSED BY THE CONTROLLER?

5.1. Categories of personal data that are processed by the Controller depend on the services of the Controller used by the Data Subject. For example, upon the Data Subject receiving or expressing the desire to receive the services of the Controller, to purchase services from the Controller according to the legal requirements and the legitimate interests of the Controller, the Controller has the duty and the right to process information identifying the Data Subject and information certifying identity of the Data Subject. In this case, in order to achieve the goal of service provision, the Controller can process the amount of personal data, which includes the name, surname, personal identification number and contact information, and information on the received and receivable services (how often, what services are chosen, payment methods and deadlines, delayed payments, etc.) and others; information is stored in the Controller's data processing systems. Controller may receive personal data from insurance company as from a third party, for example in the cases when data subject enters into contract of insurance using Controller’s services. Upon the Data Subject receiving services, personal data are processed in accordance with the agreement entered into by and between the Parties, which can be entered into remotely by the Data Subject accepting the offer made by the Controller.

5.2. When the Data Subject communicates with the Controller in writing, the content and time of communication can be stored as well as details of the means of communication (e-mail address, telephone number, Skype user name, address, information specified in the e-login system, etc.).

5.3. During the visit to the website, the Controller or service providers authorised by the Controller use a variety of data storage technologies in order to ensure that the visit to the website is as convenient and safe for the visitor as possible. Cookies are small text files (of some Kb) that the visitor's web browser deploys on the visitor's computer, tablet, phone or another smart device. They allow the website to store information in connection with the visit about:

- Access data (such as IP address of the device from which access is made, time of access);
- Type of web browser used;
- Demographic data (age, gender);
- Visit to the website (such as what sections were visited, in which services interest had been expressed).

5.4. In the event that the Data Subject has opted to receive information from the Controller, the Controller will process his/her data, which may contain both the name and surname, e-mail and phone number as well as information reflected on social media of the Data Subject, where the Data Subject has opted to obtain information through social networking platforms.

5.5. Photo and video documentation, recording of interviews is carried out at the events organised by the Controller and its cooperation partners, as a result of which photo and video images of the event’s visitors and participants may be processed by saving them in the Controller's archives, publishing on the website, on social media accounts maintained by the Controller and other information materials of the Controller.

WHAT IS THE LEGAL BASIS FOR PERSONAL DATA PROCESSING?

6.1. Data processing in order to ensure the provision of services is carried out based on Article 6, paragraph 1, subparagraphs b) and c) of the Regulation, i.e. processing is necessary for the performance of the agreement that the Data Subject is a party of or in order to take measures at the request of the Data Subject prior to entering into the agreement; processing is necessary for compliance with the legal obligation applicable to the Controller. As well as, in some cases, in order to ensure the legitimate interests of the Controller and third parties (for example, to investigate cases where complaints about the quality of service have been received, to carry out follow-up controls in order to improve service provision as well as to ensure evidence against possible claims) data processing is performed based on Article 6, paragraph 1, subparagraph f). Personal data included in the agreements, billing and accounting documents and others processed by the Controller may be used for other purposes as well by the Controller implementing the legitimate interest or if adequate and specific consent of the Data Subject has been received, even though the original purpose of processing of data has been different.

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6.2. Storage and recording of incoming and outgoing communications (emails, letters) is carried out based on Article 6, paragraph 1, subparagraphs b), c) and f). In order to ensure the performance of statutory obligations of the controller, that is to account correspondence according to the Controller's nomenclature and the requirements arising from the Archives Law, as well as to ensure meeting of the legitimate interests of the Controller (e.g. to investigate cases where complaints about service quality have been received and to ensure evidence against potential claims).

6.3. The Controller performs analysis of websites, social media visiting history to carry out market research and analyse opinions of Data Subjects, based on Article 6, paragraph 1, subparagraph f), i.e. the Controller has a legitimate interest to carry out the analysis, which indicates or may be indicative of recognition of the brand or brands represented by it, as well as to carry out surveys by sending relevant information and offers to the Data Subjects.

6.4. Upon opting to receive information, the Controller provides Data Subjects with the opportunity to object to the processing of data at any time by withdrawing their consent for such processing, i.e. refusing to continue to receive commercial information or other information on the news of the Controller. Where appropriate, the legal basis for data processing is the consent of the Data Subject based on Article 6, paragraph 1, subparagraph 1) of the Regulation.

6.5. With a view to provide information on the measures organised by Marine Services Group in mass media and social networks in order to ensure the recognisability of Marine Services Group, personal data processing shall be carried out on the basis of Article 6, paragraph 1, subparagraphs a) and f) of the Regulation, i.e.:

- The Controller is entitled to process personal data if the Data subject himself or herself has provided consent to his or her personal data processing for one or several purposes. The consent of the Data Subject is his or her free will and an independent decision which is provided voluntarily, thus allowing the Controller to process personal data for the purposes set forth in this Policy. Consent of the Data Subject shall be binding if it is provided verbally (for example, before a measure and the Data Subject is provided with information in this Policy that the personal data processing will be carried out and that the Data Subject agrees, by visiting the measure, giving interviews, taking photos and video knowingly, to the use of his or her personal data for the achievement of the objectives provided for in this Policy). The Data Subject has the right to revoke his or her consent given previously at any time by using the contact information indicated in this Policy. Revocation of consent does not affect the lawfulness of such data processing that was carried out while the consent of the person was effective. By revoking consent, data processing which is carried out on the basis of other legal grounds, for example, on the basis of legitimate interests of the Controller and third parties, cannot be discontinued.
- The Controller has a legitimate interest to demonstrate the measures organised by it or the measures in which it participates in mass media and social networks, thus ensuring the recognition of the brand or brands represented by it. The Controller, when selecting what information to publish, shall always apply the highest ethical standards, thus trying to ensure that the rights and freedoms of the Data Subject will not be infringed by publications. Concurrently, the Controller shall be aware that it is, possibly, not informed about all of the facts and circumstances; therefore the Controller shall, in order to ensure fair data processing, not prevent the Data Subject from contacting the Controller at any time by using the indicated information (e-mail: anna.celma@marineservices.lv), in order to enable it to object to data processing.

WHAT IS THE DURATION FOR PERSONAL DATA PROCESSING?

7.1. When selecting criteria for the storage of personal data, the controller shall take into account the conditions specified below:
7.1.1. whether the time period for personal data storage is determined or arising from the laws and regulations of the Republic of Latvia and the European Union;
7.1.2. how long it is needed to store personal data in order to ensure the implementation and protection of legitimate interests of the Controller or the third party;
7.1.3. until the consent of the Data Subject to process personal data is withdrawn and there is no other legal basis for data processing, for example, to comply with the obligations binding upon the Controller;
7.1.4. it is necessary for the Controller to protect the essentially important interests of the Data Subject or other individual, including the life and health thereof.

7.2. Upon providing the services, the Controller complies with the special laws and regulations governing its obligation to retain certain data. If you want to learn detailed information, please contact the Controller by using the contact details specified.

7.3. Upon providing services that have a defined claim submission deadline, information on the aspects of service provision will be retained for at least 3 years, subject to the limitation period applicable to the legal relationship concerned.

7.4. Incoming and outgoing communication (e-mail, letters by mail) will be stored for a period not exceeding 5 years, unless the relevant communication reflects an eventually illegal act or conduct, which will potentially help the Controller or third parties to ensure their legitimate interests.

7.5. After expiry of the storage period personal data will be permanently deleted, unless the applicable laws and regulations, such as the Archives Law, impose an obligation to continue storing personal data.

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WHO CAN ACCESS THE INFORMATION AND TO WHOM IS IT DISCLOSED?

8.1. The controller has a duty to provide information on the personal data processed:
8.1.1. to law enforcement institutions, the court, state and local government institutions if it arises from laws and regulations and the institutions concerned are entitled to the information request;
8.1.2. if personal data should be transferred to the third party concerned under a concluded agreement in order to perform a function necessary for the performance of the agreement (e.g. in the event of the insurance agreement, information about the insurance event and its circumstances; for the implementation of legitimate interests of the Controller), or if there is a need to improve the quality of services by involving service providers - subcontractors;
8.1.3. according to a clear and unambiguous request of the Data Subject;
8.1.4. to protect legitimate interests, such as when going to court, to state or local government institutions against a person that has violated such legitimate interests of the Controller.

8.2. Personal data recipients may be employees authorised by the Controller, Processors, law-enforcement and supervisory authorities. Personal data recipients, especially Processors, may be organizations located in third countries and providing services to the Controller. Insurance companies pay be data recipients. Controller adheres to the Regulation in respect of necessity to ensure adequate level of protection in the case when personal date are transferred to third countries.

8.3. The Controller will only issue personal data to the necessary and sufficient extent in conformity with the requirements of laws and regulations and justified objective circumstances of the particular situation.

8.4. In the event where the objective of data processing is to publish information, to provide information on social media, the Data Subject must be aware that the range of data recipients is unlimited.

HOW IS A DATA SUBJECT INFORMED REGARDING PERSONAL DATA PROCESSING?

9.1. The Data Subject shall be informed regarding personal data processing indicated in this Policy by using a multi-level approach, which contains the following methods:
a) notices of this Policy shall be placed through the application forms of the Controller's e-environment;
b) when visiting the website, the Data Subject can research a statement about what cookies are used as well as is invited to research this Policy;
c) this Policy is publicly available on the Controller's website and the customer service locations of the Controller;
d) information about this Policy is provided in the signature section of the Controller's e-mail messages.

RIGHTS OF THE DATA SUBJECT

10.1. A Data Subject has the right to request the Controller provide access to his/her personal data and receive detailed information on what personal data are available to the Controller, for what purposes the Controller is processing personal data, the categories of personal data recipients (persons to whom personal data are disclosed or to whom they are intended to be disclosed, unless laws and regulations allow the Controller to provide such information in a particular case (for example, the Controller may not provide information to the Data Subject regarding the relevant state authorities which are persons directing the criminal procedures, subjects of investigatory operation or other authorities, the data of which are prohibited to be disclosed by regulatory enactments), information regarding the period during which the personal data will be stored, or criteria used for the determination of such period.

10.2. If the Data Subject considers that the information at the disposal of the Controller is out-of-date, incorrect or wrong, the Data Subject has the right to request the correction of his or her personal data.

10.3. The Data Subject has the right to request the deletion of his or her personal data, or to object to the processing thereof, if the Data Subject considers that data have been processed illegally, or they are not necessary anymore in relation to the purposes for which they have been collected and/or processed (upon implementing the right of the principle "to be forgotten").

10.4. The Controller shall give notification that personal data of the Data Subject may not be deleted if the processing of personal data is needed for the Controller to protect the vital interests of the Data Subject or of another individual, including life and health; to protect the property of the Controller; for the Controller or a third party to bring, exercise or defend lawful (legal) interests; for archiving purposes in accordance with applicable laws and regulations governing the building of archives.

10.5. The Data Subject has the right to request that the Controller restricts the processing of personal data of the Data Subject if any of the following circumstances exist:
10.5.1. accuracy of the personal data is contested by the Data Subject - for a period enabling the controller to verify the accuracy of personal data;
10.5.2. the processing is unlawful, and the data subject objects to the erasure of the personal data and requests the restriction of their use instead;

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10.5.3. The Controller does not need personal data for processing anymore, however they are necessary for the Data Subject in order to bring, exercise or defend lawful claims;
10.5.4. The Data Subject has objected to processing while it is not verified whether legitimate reasons of the Controller are more important than legitimate reasons of the Data Subject.

10.6. If the processing of personal data of the Data Subject is restricted in accordance with Paragraph 10.5, such personal data, except for storage, shall only be processed with consent of the Data Subject or in order to bring an action, exercise or defend lawful rights, or in order to protect the rights of another individual or legal entity, or important public interests.

10.7. Before revocation of the restriction of personal data processing of the Data Subject, the Controller shall inform the Data Subject.

10.8. The data subject has the right to withdraw the consent at any time, if such consent was given and if personal data are being processed on this basis.

10.9 The Data Subject has the right to file a complaint with the Data State Inspectorate if the Data Subject believes that the Controller has processed personal data unlawfully.

10.10. The Data Subject may submit a request regarding the implementation of his or her rights in the following way:
10.10.1. in writing in person, in the premises of the Controller by presenting a personal identification document (such as passport or ID card), because the Data Subject has a duty to identify himself or herself;
10.10.2. in the form of electronic mail, by signing it with a secure electronic signature, if electronic mail contains an e-mail on which the Data Subject wishes to receive a response. In such a case it is presumed that the Data Subject has identified himself or herself by submitting a request, which is signed with a secure electronic signature. Concurrently, the Controller shall reserve the right to request additional information from the Data Subject in the event of doubt, if the Controller considers it necessary;
10.10.3. by using a mail consignment. In such case a reply will be drawn up and sent by using a registered letter, thus securing that unauthorised persons may not receive such consignment. Concurrently, the Controller shall reserve the right to request additional information from the Data Subject in the event of doubt, if the Controller considers it necessary.

10.11. The Data Subject is obliged to clarify in his or her request as soon as possible, the date, time, place and other circumstances that could help to execute his or her request.

10.12. After the receipt of a written request of the Data Subject regarding exercising his or her rights, the Controller shall:
10.12.1. verify the identity of a person;
10.12.2. assess the request, if:

- the request, for example, viewing video materials or listening to audio recordings may be granted, then the Data Subject, as a submitter of the request, may receive a copy of the video material or audio recording, or other data;
- additional information is necessary in order to identify the Data Subject who is requesting the information, the Controller may request additional information from the Data Subject in order to be able to select the information correctly (for example, video surveillance or discussion recordings, photographs) where the Data subject may be identified;
- the information is deleted or the person who requests the information is not the Data Subject or the person may not be identified, the Controller may reject the request in accordance with this Policy and/or laws and regulations.

HOW ARE THE PERSONAL DATA PROTECTED?

11.1. The Controller ensures, reviews on a regular basis and improves the personal data protection measures in order to protect personal data of the Data Subject from unauthorised access, accidental loss, disclosure or destruction. In order to ensure this, the Controller shall use corresponding technical and organisational requirements, including firewalls, intrusion detection, analysis software and data encryption.

11.2. The Controller shall carefully check all service providers that process personal data of the Data Subjects on behalf of and in accordance with the assignment of the Controller, and also assesses whether service providers use appropriate security measures in order for the processing of personal data of the Data Subjects to be performed in conformity with the delegation of the Controller and the requirements of laws and regulations.

11.3. In the event of a personal data security incident, if it will cause a potentially high risk to the rights and freedoms of the Data Subject, the Controller shall notify the relevant Data Subject thereof, if it will be possible, whether the information will be published on the website of the Controller or in another possible way for example by using the media (TV, radio, newspaper, social networks etc.).

The updated version was developed on 08.11.2019.

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