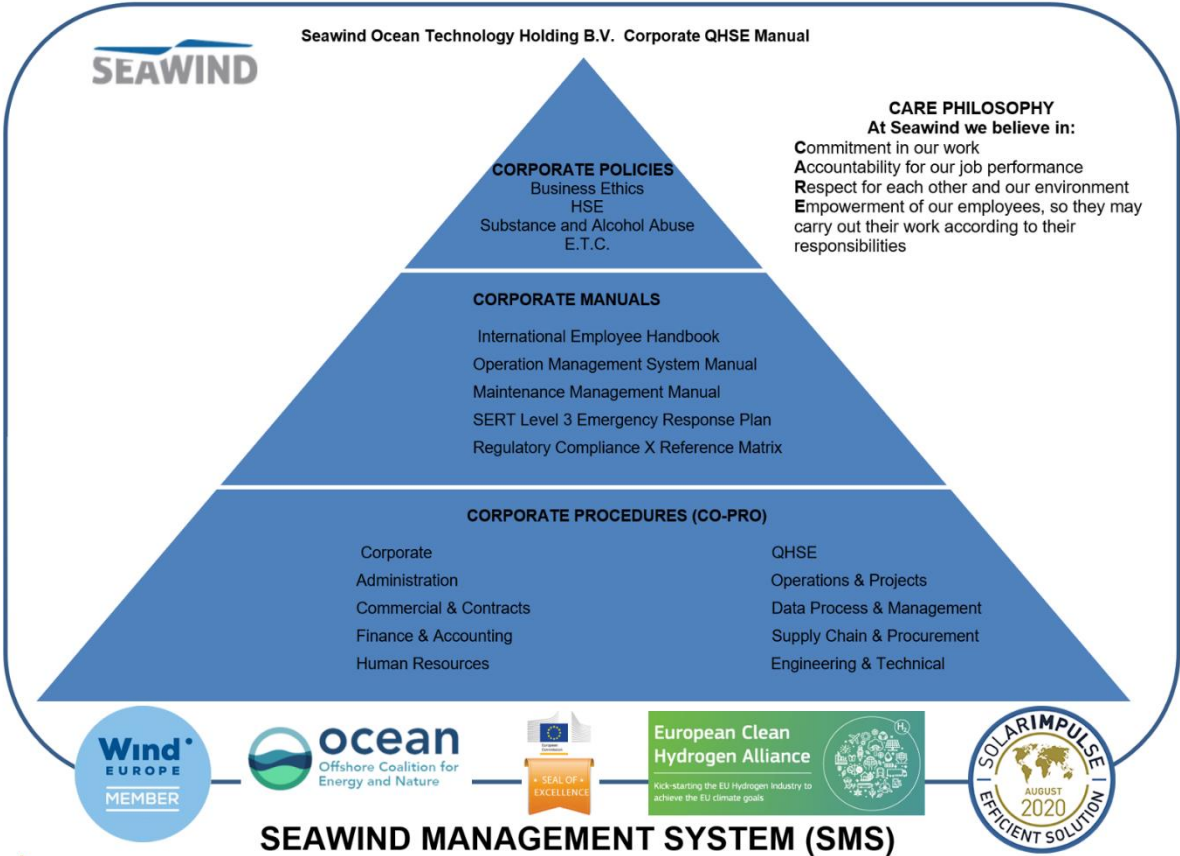


Policy No: **CO-POL- 502**

Policy Title: **PRIVACY POLICY**





## 1. Introduction

The board of directors of Seawind Ocean Technology Holding B.V. has approved this Code of Ethics for all the Company's business partners, customers and any party interested in our business.

## 2. Valid for

This policy is applicable for Seawind Ocean Technology Holding B.V. and all its subsidiaries and affiliates.

## 3. Purpose

At Seawind Ocean Technology Holding B.V. ("**Seawind**" or "**we**" or "**us**"), we are committed to protecting your privacy and we value the relationship with our business partners, customers and any party interested in our business. This Privacy Notice (the "**Notice**") outlines the types of information, including Personal Data ("**Information**" or "**Personal Data**"), we collect about our business partners, our customers, and our website, how they are used and otherwise Processed, to whom we may disclose them as well as your rights in relation to your Information.

## 4. Who is responsible for your information?

Seawind Ocean Technology Holding B.V. is a global company, operating through its Affiliates companies with headquarters in The Netherlands, at Kabelweg 22, 1014 BB Amsterdam, The Netherlands. Seawind Ocean Technology Holding B.V. or any of its Affiliates will be responsible in respect to the Information we collect about you and will be referred to as the Data Controller according to the GDPR. If you have any questions about your personal data which are not answered by this Privacy Policy please contact our Data Protection Officer, Penny Tokmakidou, contact email: [p.tokmakidou@seawindtechnology.com](mailto:p.tokmakidou@seawindtechnology.com)

Circumstances, such as cross-border matters, Seawind and its Affiliates will be jointly responsible for your Information and will collaborate, to the extent necessary, to comply with our obligations under Applicable Laws.

## 5. Information collected by us

Seawind collects Information that are voluntarily provided by you or collected by automated means as outlined below.

Information we collect about our business partners and customers is primarily company data and business information.

- **Information provided by you** - If you choose not to provide us with your Information, we may be unable to supply you with our services.

Types of Information you may be asked and thus choose to provide:

- Name and surname
- E-mail address
- Business mailing address
- Telephone number
- Postal code
- Company
- Position

- **Information provided to us by automated means** - Seawind also collects certain Information automatically when you visit our website, such as:

- IP addresses and domain names
- Browser and platform type
- History of pages viewed on our website
- Your language and cookies preferences

## 6. How we use the information we collect

- **Purposes of Processing** - We use Information we collect for the following purposes:
  - To administrate our website
  - To communicate with you and to respond to questions that you have asked through our "contact us" page
  - To measure the performance of our e-mail campaigns and to improve our offerings



- To prepare, conclude and execute contracts with you
  - For credit collection and accounting
  - For customer relationships management
  - To communicate, at our discretion, changes to this Notice
  - To send you information that you have asked
  - To improve continuously our products and services
  - To customize the content of our website and deliver a better experience to you
  - To analyze trends and statistics
- **Legal basis of Processing** – Seawind may Process your Information on various legal basis such as:
- Preparing and entering a contract with you; and/or
  - Necessary for the establishment, exercise of defense of legal claims; and/or
  - Complying with our legal or statutory obligation(s), such as anti-money laundering and fraud prevention regulations, VAT and accounting obligations, etc.; and/or
  - Your consent, as the case may be; and/or
  - Our legitimate interest as outlined above.
- Should you provide us with Information **related to a Third Party**, you confirm that you have a legal basis to do so (consent or another lawful basis, as the case may be) to share such Information with us and that you have made the information in this Notice available to the Third Party.

## 7. How we may share the information we collect

We will not share, sell, license, trade or rent your Information to or with any Third Party (except as stated below) without your consent.

We will only share Information as follows:

- a) **Affiliates:** We share Information within the Affiliated companies of Seawind whenever this is necessary or useful in the framework of our business relationship.
- b) **Law enforcement purposes:** We disclose Information if requested or required by government authorities (such as law enforcement authorities, courts, and/or regulators) or otherwise to comply with a legal obligation. In addition, we also disclose Information collected in order to exercise or protect legal rights or defense against legal claims.
- c) **Our Third-Party service providers, agents and distributors ("service providers"):** We share Information with our service providers who provide services to us or on our behalf. These service providers are contractually prohibited from using your Information for any purpose other than to provide their assistance, from sharing Information we disclosed to them and are required to protect your Information.
- d) **Transfer of Information outside of the European Economic Area ("EEA"):** We may transfer Information to certain Affiliates located outside the EEA. Such transfer will take place based on our Data Transfer Agreement. Transfer to other third parties outside the EEA will take place using a data transfer mechanism in accordance with GDPR standards.
- e) **Fraud prevention:** We disclose Information when disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of our users, others and/or us.

## 8. How we protect collected information

We use appropriate technical and organizational measures to protect your Information against unauthorized or unlawful Processing and against accidental loss, destruction, or damage. We also limit access to your Information to employees who reasonably need access to it to provide services to you.

## 9. How long we retain information

We will retain Information we collect for as long as necessary to perform the purposes outlined above or to comply with a legal obligation, or for the establishment, exercise, or defense of a legal claim in accordance with Applicable Laws.

## 10. Your rights

The GDPR and other countries' privacy laws provide certain rights to you. Those rights may vary depending on your location and are subject to various conditions under Applicable Laws. In certain



cases, the exercise of your rights may make it impossible for us to achieve the purposes identified in above.

Should you want to assert your rights, please see **section 11** below.

We will do our best to provide you with the requested information within the legal deadline. However, if access cannot be provided within a reasonable time frame, we will provide you with an explanation and a date when the information will be provided. If for some reason access is denied, we will provide you with an explanation as to why access has been denied.

Where Applicable Laws so provide, the following rights apply to you:

- a) **Access:** You have the right to obtain confirmation whether we Process your Information and to obtain a copy of your Personal Data;
- b) **Rectification:** You have the right to request the rectification of any inaccurate Personal Data and to have incomplete Personal Data completed;
- c) **Objection:** At any time, you have the right to object to the Processing of your Personal Data for direct marketing purposes;
- d) **Portability:** You may receive your Personal Data provided to us, in a structured, commonly used, and machine-readable format. In addition, you have the right to have your Personal Data transmitted, where technically feasible, to other Data Controllers without hindrance. This right only exists if the Processing is based on your consent, or a contract and the Processing is carried out by automated means;
- e) **Restriction:** You may request the restriction of the Processing of your Personal Data in accordance with Article 18 paragraph 1, a) to d) of GDPR;
- f) **Erasure:** You may request the erasure of your Personal Data if it is no longer necessary for the purposes for which we have collected it or when you have withdrawn your consent and no other legal ground for the Processing exists or when you objected and no overriding legitimate grounds for the Processing exists or when the Processing is unlawful, or erasure is required to comply with a legal obligation;
- g) **Right to lodge a complaint:** You also have the right to lodge a complaint with the competent Supervisory Authority and before the competent courts;
- h) **Right to refuse or withdraw consent:** In case we ask your consent, you are free to refuse to give such consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any Processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected;
- i) **Opt-out:** You can always 'opt-out' of any communications should you prefer not to receive them in the future by using the "unsubscribe" facility provided in the communication itself

## 11. Contact

For any right you would like to exercise or for any question you might have about the way we Process your Information, please contact us at [info@seawindtechnology.com](mailto:info@seawindtechnology.com) .

## 12. Amendments to this notice

We may update this Notice from time to time in accordance with legal requirements and/or any changes to our Information management practices. When required, we will notify you about such change. A copy of the latest version of this Notice will always be available on our website [www.seawindtechnology.com](http://www.seawindtechnology.com).

## 13. Definitions

**Affiliates:** refers to Seawind's affiliates, which are entities under common ownership or control of Seawind.

**Applicable Laws:** means any applicable national data protection and privacy laws and, to the extent applicable, the GDPR.

**Controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and the means of the Processing of Personal Data.



**GDPR:** means the 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).

**Information:** any type of information about you, including Personal Data.


**Personal Data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, 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.

**Processing or Processed or Process:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Supervisory Authority:** refers to the national public supervisory authority that is competent for supervising and enforcing compliance with any national data protection laws within its jurisdiction.

**Third Party or Third Parties:** means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to Process personal data.

Martin Jakubowski

DocuSigned by:  
  
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Chairman  
Seawind Ocean Technology Holding B.V.