

## **GDPR PRIVACY POLICY**

This notice constitutes our privacy policy for DEMETRIOU-KOUTIS-LAMBROPOULOS AND CO, commercially acting by the title of EVIA SHIPPING AGENCIES. Here we describe the practices we follow to respect the privacy of all physical persons' private information as per the EU GDPR regulation which came into force from 25<sup>th</sup> of May 2018.

In this notice, personal information means data of any form (electronic, printed or verbal) which relates to an individual and which identifies that individual, either directly or indirectly, such as name, surname, passport copies or National ID Nr copies, personal email address, phone number, home address, medical information, certificates of Competency for mariners, medical certificates or other information as described by the GDPR Regulation relevant clauses.

EVIA SHIPPING AGENCIES operates throughout all Greek Ports and Terminals.

EVIA SHIPPING AGENCIES as data controller (herein after referred as "EVIA SHIPPING AGENCIES" or "Data Controller") hereby informs individuals connected with our activities that it processes personal data provided by them directly or through their employers, supervisors or management officials .

### **Who we are**

EVIA SHIPPING AGENCIES is a shipping agency company based in Chalkis City, Greece. EVIA SHIPPING AGENCIES exists to offer full general agency services to ship owners, ship managers, charterers and ship brokers subject to the party involved in the appointing of our company. The broad range of services we offer extends from full agency services, to crew changes, medical assistance to crews etc. (see full list of offered services in our website [www.eviashipping.com](http://www.eviashipping.com) )

### **Information we may collect from individuals directly.**

During the conduct of our agency services, and subject to the orders we receive from Masters / Owners or generally our principals, we may be called to conduct: operational email exchanges, crew changes, VISA issuance formalities for crewmembers, escorting mariners to medical services and transmitting medical reports to ship owners / crew managers for confirming the fitness of mariners to work, entry of various kinds of 3<sup>rd</sup>-party service providers to the ports' ISPS areas. The information you give us for successfully attending the above operations may include name, surname, passport copies or National ID Nr copies, personal email address, phone number, home address, medical information, certificates of Competency for mariners, medical certificates.

### **Information we receive from other sources.**

During the conduct of our agency services, and subject to the orders we receive from Masters / Owners or generally our principals, we are called to communicate various forms towards State Authorities (Port Authorities, Customs Office, ISPS officers of Ports, Police Authorities) subject to our National Regulations concerning matters of National Safety. Therefore, we are processing and transmitting crew lists, passenger lists, and personal details of 3<sup>rd</sup> party providers to all relevant authorities as per

regulations in force. We are collecting these information or lists through your employers / ship owners / crew managers / ships Masters.

### **Disclosure of your information**

We may share your personal information with: The Data Controller's staff deputed to the processing of personal data (including, but not limited to): Employees of the Company, ISPS officers of the Ports that vessels are calling for our services, Greek Embassies, Consulates, ship owners' manning agents, Police Authorities, Port State control authorities, Customs Authorities, selected third-parties including business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, providing you have given the necessary consent. We don't sell any of your information to anyone, and we never will.

We may disclose your personal information to third parties: to fulfill the obligation provided by the law, regulations, protocols and national and EU legislation; to implement laws required by public Authorities; to allow the defense in court if such occurs for any reason whatsoever.

### **How do we respond to legal requests?**

We access, preserve and share your information with regulators, law enforcement or others in the following circumstances:

- 1) In response to a legal request, where we believe in good faith that the law requires us to do so. We can also respond to legal requests where we believe in good faith that the response is required by law in that jurisdiction, affects individuals in that jurisdiction, and is consistent with internationally recognized standards.
- 2) When we believe in good faith it is necessary to: detect, prevent and address fraud, or other harmful or illegal activity; to protect ourselves (including our rights, property or services), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.

### **Where we store your data**

The data that we collect from you will be stored in a destination inside the European Economic Area ("EEA") and will not be transferred outside the EEA unless we have your explicit consent to such transfer and storage. Our storages are located in Chalkis, Greece. In any event, your data will only ever be transferred to organizations where an approved code of practice from the competent DPA in relation to data protection is adopted.

In any case, if personal data will be transferred to countries that do not provide the same level of protection, or in any case an adequate level of protection, EVIA SHIPPING AGENCIES will ensure that it will enter into specific contractual obligations according to the applicable data protection legislation (including the execution of the Standard Contractual Clauses as approved by the European Commission) with each service provider, unless we can rely on any other legal basis for the transfer of personal data.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **Security**

EVIA SHIPPING AGENCIES works to protect the confidentiality and security of information it obtains in the course of its business. Access to such information is limited and policies and procedures are in place, designed to safeguard the information from loss, misuse and improper disclosure.

We use strong encryption, both when your information is moving to or from our email address and also whilst your information is held by us.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

### **Data retention policy**

EVIA SHIPPING AGENCIES stores personal data for the time necessary to achieve the purposes for which data are collected and further processed, including any retention period required under the applicable legislation (e.g. retention of accounting documentation) and subject to any applicable laws, for a maximum of 5 years from the storage of the personal data.

### **Your rights**

Under the General Data Protection Regulation, you have the right to access, rectify, report, limit and erase your data. You can exercise those rights by contacting us at [agency@eviashipping.com](mailto:agency@eviashipping.com) or Tel: +30 2221022231. Verification, updating or amendment of personal data will take place within 10 days of your request.

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by EVIA SHIPPING AGENCIES or its partners and affiliates, you have the right to complain to [agency@eviashipping.com](mailto:agency@eviashipping.com)

### **Contacts**

If you have any questions concerning this privacy policy and data protection, please contact EVIA SHIPPING AGENCIES at [agency@eviashipping.com](mailto:agency@eviashipping.com)

Date of Last Revision: January 1<sup>st</sup>, 2021.