# **Privacy Policy**

Vesseldove values the privacy of your personal data and your usage of our Service and Data. We need to collect, use and disclose personal information in order to perform our business functions and services. This Privacy Policy explains what information Vesseldove collects about you and why and how it may be used and shared.

This Privacy Policy is incorporated into the Vesseldove Terms of Service, and applies to the information obtained by us through your use of this website, the Service and other Vesseldove products and services.

#### Information collection

The mission of Vesseldove is to provide highly targeted Services to the world's maritime professionals and marine enthusiasts. To achieve this mission Vesseldove makes features and functionality available through our website, including our mobile and other applications, API, premium services, and other information provided as part of the Vesseldove services ("Services") to enable personalised access to our Data and networking features. Registering an account with Vesseldove is optional. By registering with Vesseldove, you voluntarily and willingly provide Vesseldove certain information, including personally identifiable information, which we collect in order to provide the Services. If you have any hesitation about providing information to us and/or having your information displayed on the Vesseldove website or otherwise used in any manner permitted in this Privacy Policy and the User Agreement, you should not become a member of the Vesseldove Services; and, if you are already a member, you should close your account.

A list of the Personal Data Vesseldove may collect, and why we collect it, follows.

# What is personal data?

Personal data means any information relating to you which allows us to identify you, such as your name, contact details and information about your access to our website, mobile app and other Vesseldove Services.

We may collect personal data from you when you use our website or mobile apps, you register with us, purchase any of our services, or when you contact us. We may also collect personal data either directly or indirectly through our trusted third party partners.

What types of personal data does Vesseldove collect?

# Registration and log-in information

We collect the information you provide in our registration form when you sign up for an account. In order to become a Member of Vesseldove you need to provide us your name, country, line of business, email address and password in order to create your own personal account.

#### Web visitors

Vesseldove collects information of visitors of our website or mobile apps, where this is voluntarily provided to meet a request from those individuals, such as when they interact with Vesseldove's Customer Service and Sales teams in order to accurately categorise and respond to their requests. For example, we collect email address, company name, telephone and operating system when visitors fill our contact form and request any information on our services, or the information they provide us when they apply for a vacant position in our company.

#### **Employee and Human Resource Data**

Vesseldove collects information from applicants to open positions or seeking employment with us, including private contact details, professional qualifications and previous employment history, necessary to reach employment decisions. Once employed, we collect information on staff for human resource, performance, payroll and tax purposes. We will collect and record employee level information in various company systems consistent with standard business operations such as the staff calendar or the company email platform that we use. We may also collect similar information relating to freelance consultants and contractors.

### **Use of Services**

We collect information when you interact with and use the Vesseldove website, Vesseldove mobile applications and API. Specifically, we collect information about what and how you use our Services, such as the types of vessels you view or the frequency and duration of your activity. This can also include information about content you provide, such as the name or location of a photo you upload or the date a file was created by you. For example, we may log activity when you rate photos, click on ads, install a Vesseldove mobile application etc

#### **Device information**

When you access our website and mobile apps or open electronic correspondence from us, our servers may record data regarding your device and the network you are using to connect with Vesseldove. We collect information from or about the computers, phones or other devices where you access or install our Services, such as the operating system and hardware version you use, device settings, battery and signal strength, device identifiers and locations, including specific geographic locations, such as through GPS, Bluetooth or WiFi signals. For example, if you have given permission to the Vesseldove mobile application to use your device's location, we might use this information for statistical purposes or to check you in a vessel or improve Vesseldove tracking coverage. We also collect information about your connection such as your internet service provider or your mobile operator, browser type, language and time zone, mobile phone number and IP address.

### Information about payments

When you purchase any of our premium Services or subscriptions we collect only as information as necessary such as billing (payment amount) and contact details (email address) regarding this purchase. Vesseldove does not collect any of your credit or debit card details, such as the credit or debit card number, the name of the holder or other card information.

## Information from third – parties

We may collect information about you and your activities on and off Vesseldove from third-party partners, such as information from a partner when we offer our Services jointly or from an advertiser about your experience or interaction with them.

## How do we use your personal data?

We may process the personal data we collect in the following ways:

- filing and archiving your personal data in databases for the proper execution of our Services to you
- delivering, developing and improving our Services
- to communicate with you about our Services and inform you about our policies and terms and keeping records of this communication
- to promote and ensure the security of our website and Services
- internal accounting and administration

- to comply with our legal obligations, for example regarding labour or tax law
- for research and analysis in relation to our business and services, including but not limited to trends and preferences in sales and use of our website and apps
- involving you in market research and seeking feedback regarding our relationship with you and/or the service we have provided;
- targeted marketing communications relating our products and services (and those of third parties) that we think may interest you, in case you have expressly requested and/ or consented to receiving such actions from us.

We will only process your information, if you have previously given your consent to such processing (which you may withdraw at any time in the future), or in case the processing is necessary to provide our services to you; or for compliance with our legal obligations; and/or the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal information; or according to our contractual arrangement.

# Is personal information disclosed to third - parties?

Vesseldove takes the privacy of your personal data very seriously, and we do not sell, rent, or otherwise provide your personally identifiable information to third parties, except as described in this policy.

We may disclose personal data for the purposes and under the terms mentioned in this Privacy Policy to third – parties and specifically to:

- our employees; Vesseldove ensures that our employees who h process your personal data
  are perfectly trained regarding the lawful manner for any processing thereof and have access
  only on a need-to-know basis in order to meet legitimate business purposes or according to
  the execution of contractual obligation.
- our contractors and service providers, including suppliers of IT based solutions, that assist Vesseldove in providing its Services;
- external business advisers, such as lawyers and auditors;
- financial institutions and credit card providers, according to your explicit consent and authorization for the execution of a payment order (for example PayPal or Braintree);
- Google, mainly for email and calendar services and the provision of Google Analytics service;
- marketing and market research and analysis companies (for example Salesforce and Hubspot);
- government agencies, public authorities and regulatory bodies in order to comply with a valid and authorised request, including a court order or other valid legal process.

Regarding the abovementioned third-party partners of Vesseldove, we ensure that that any processing of the personal data we may disclose to them is subject to the terms of this policy and concerns exclusively the defined by Vesseldove purposes as described above. For that reason, we adopt contractual agreements whereby the usage of specific technical safety measures is mandated in order to safeguard that your personal data remain secure and is processed only for the purposes defined by us, and not further in manner that is incompatible with our purposes, and in any case in compliance with the applicable law. We do not disclose or transfer your personal data to recipients outside the European Economic Area. We may also provide aggregated anonymous information about the usage

of our Services to third parties for our legitimate purposes such as to prospective advertisers on Vesseldove.

## **Security measures**

Vesseldove is committed to protecting the security of your information and takes reasonable precautions to protect it. Once we receive your data transmission, we make all commercially reasonable efforts to ensure its security on our systems:

We implement and maintain appropriate technical and organizational measures to ensure a security level appropriate to protect personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal information transmitted, stored or otherwise processed. We train all our employees meticulously to follow the principle of strict compliance with all legal requirements. Certain Vesseldove Services support the use of standard SSL encryption to protect data transmissions. Your personal information and data stored in our systems is protected by various physical, electronic and procedural safeguards. It is housed in a secure facility, and Vesseldove and our hosting partners restrict physical and network access to this facility to select trained staff. Your Vesseldove password is protected by encryption so that only you have access to it.

We regularly evaluate and review our technologies, facilities, procedures and potential risks to maintain the security and privacy of our users' data. In any case we will destroy or de-identify personal information once we no longer require it for our business purposes as explained herein, or as required by law.

Vesseldove is not responsible for any third party's actions or their security controls with respect to personal information they may collect or process via their websites, services or otherwise.

### Cookies

Cookies are small data files that a web site you visit may save on your hard drive. Cookies are used to store and receive identifiers and other information on computers, mobile phones and other devices. While the cookies we use may change from time to time as we update and improve our services, they generally fall into the same categories of use as the previous ones. A cookie cannot in any case retrieve any other data from your hard drive or pass on computer viruses.

Like most websites, if you have a Vesseldove account or use the Vesseldove services (whether or not you are registered or logged in), we use cookies and web log files on our website, in our emails, within our apps and through third party apps that use our API to provide you with a range of products and services. We use cookies to verify your account, to help us keep your account, data and Vesseldove services safe and secure, to track site usage and trends in order to better understand how people and companies use Vesseldove services so that we can improve the quality of our services, to customize your experience on Vesseldove, as well as to deliver Vesseldove and third-party advertising to Users, who may be interested in the products or services we or they provide.

One type of cookie, known as a "persistent" cookie, is set once you've logged in to your Vesseldove account. The next time you visit the Vesseldove website, the persistent cookie will allow us to recognise you as an existing User so you will not need to log in before using the Services, to display the Live Map as you last configured it etc.

We might also use third-party cookies, in order to enhance your experience or improve our understanding of the use of our products.

We use Google Analytics to help us understand how users use our services. Google Analytics cookies do not provide Vesseldove with any personally identifiable information. They can tell us things like how you arrived at the Vesseldove site, if you have visited the site before, how long you stay on the site, and which pages on the site you visited. They can also provide us with general information about where in the world a user may be located. This information helps us understand how people use our site and our products, and it gives us information about the kind of experience people have on our site and with our products, all of which helps us learn how to make the Vesseldove experience even better.

Click <u>here</u> to learn more about Google Analytics and your privacy. To opt out of being tracked by Google Analytics when using our web-based products, click <u>here</u>.

You can at any time remove or block cookies using the settings in your browser, but in some cases doing so may prevent Vesseldove from fully functioning. Unless you remove or block cookies, as mentioned above, we will retain the information we receive for as long as your account is active or you make use of our services.

## **Local Storage**

In addition to cookies, we are utilising browser local storage technology to store your preferences and make your user experience more consistent. Local storage is a persistent type of storage, that provides similar functionality to cookies, but its contents are not transmitted across the Internet, like cookies are.

Like cookies, by continuing to use our services (whether or not you are registered or logged in), through your computer or mobile device, you consent to our use of local storage in accordance with this Privacy Policy You can control how local storage works on your browser settings on a global or website specific manner. Disabling the local storage functionality on your browser will result in loss of functionality of the map and other features of the website.

### **Social Media Features**

Our Service uses social media features ("Social Features") provided by companies and services such as Facebook and Twitter to enable you to share information via these channels. The Social Features are identified on our website by these companies' respective logos. These cookies are owned and controlled by third parties, and therefore the third parties - and not Vesseldove - are responsible for their use. As such, we can't guarantee that we have listed every cookie you might get from a third party since a third party could change these cookies at any time as their needs change.

When you visit a page on the Vesseldove website that contains Social Features, your browser establishes a direct connection to the applicable social network's servers. The Social Features provide the social networks with the information that you have accessed on the Vesseldove website, and, if you are logged into the social network, your visit may be logged to your account on that service. For example, if you click the Facebook "Like" button, that information is transmitted from your browser directly to Facebook and stored by it. Even if you are not logged into the social network, or click on a Social Feature on the Vesseldove site, there is still a possibility that a Social Feature can transmit your IP address to the social network.

Vesseldove does not control social networks services, your profiles on those services, modify your personal settings on those services or establish rules about how your information and personal data will be used on those services. You and the social networks service providers are in control of the above issues and not Vesseldove. You are encouraged to read all policies and information on the applicable social media services to learn more about how they handle and safeguard your data and information, before using any such features made available to you on the service. For information on

the purpose and scope of data processing by the social network, as well as your options for protecting your privacy, please visit the appropriate social network web site's privacy policy:

Facebook Twitter

### **Social Media Pixels**

We use Facebook pixel for marketing and advertising purposes in order to display personalized ads by us and third parties on Facebook. It also helps us to improve our content and to better serve your needs. Facebook pixel may provide Vesseldove with Business Tool Data, including but not limited to: i) "Contact Information" which is information that personally identifies individuals, such as names, email addresses and phone numbers, that Vesseldove use for matching purposes only. Vesseldove will hash Contact Information that you send to us via a Facebook JavaScript pixel for matching purposes prior to transmission. When using a Facebook image pixel or other Facebook Business Tools, you or your service provider must hash Contact Information in a manner specified by Vesseldove before transmission.

ii) "Event Data" is other information that you share about people and the actions that they take on your websites and apps or in your shops, such as visits to your sites, installations of your apps and purchases of your products.

While Event Data does include information collected and transferred when people access a website or app with Facebook Login or Social Plugins (e.g., the Like button), it does not include information created when an individual interacts with our platform via Facebook Login, Social Plugins or otherwise (e.g., by logging in, or liking or sharing an article or song). Information created when an individual interacts with our platform via Facebook Login, Social Plugins or otherwise is governed by the Platform Terms. We provide Facebook with information about your user activity on our website and certain other personal data (such as your user-ID) via a pixel. This data includes but is not limited to your IP address and information about your browser and click data e.g., the buttons clicked on our website as well as their descriptions and the web pages visited. This allows users of our website, when visiting the social network Facebook or other websites that also use this function to display interest-based ads ("Facebook Ads") and us to make our website even more interesting to you. Click <a href="here">here</a> to learn more about Facebook pixel and your privacy.

We also use LinkedIn Insight Tag for marketing and advertising purposes. It enables us to statistically evaluate the use of our website in order to constantly optimize it and better control how our ads are displayed. The LinkedIn Insight Tag enables the collection of data regarding members' visits to your website, including the URL, referrer, IP address, device and browser characteristics (User Agent), and timestamp. The IP addresses are truncated or hashed (when used for reaching members across devices), and members' direct identifiers are removed within seven days in order to make the data pseudonymous. This remaining pseudonymized data is then deleted within 180 days. Vesseldove doesn't share the personal data of members with you; Vesseldove only provides reports and alerts (which do not identify members) about your website audience and ad performance. Vesseldove also provides retargeting for website visitors, enabling you to show personalized ads off your website by using this data, but without identifying the member. Vesseldove also uses data that doesn't identify members to improve ad relevance and reach members across devices. LinkedIn members can control the use of their personal data for advertising purposes through their account settings. Click here to learn more about LinkedIn Insight Tag and your privacy.

# **Children's Privacy Protection**

Vesseldove does not collect information either through its Service's or by third-parties for individual under the age of 13, and none of our Services is directed to anyone under that age.

#### **Data Retention**

Vesseldove will not retain personal data longer than necessary to fulfill the purposes for which it was collected or as required by applicable laws and regulations. The personal data you provide us may be archived and stored periodically and will only be retained for as long as it is required for the purposes it was collected, unless the law requires us to retain them for a longer period, or delete it sooner, or unless you exercise the right to erasure (where it applies), when we do not need to retain it in connection with any reasons permitted or required by law.

### **Your Rights**

Vesseldove ensures that you can under specific circumstances exercise all relevant rights in relation to your personal data, such as the right of access and correction, the right to object to any or all types of data processing, to prevent direct marketing and request transmission of your personal data in a common digital format.

## **Candidate Privacy Policy**

### Vesseldove values the privacy of your personal data

This Privacy Notice applies to the personal data of candidates applying for positions within Vesseldove and aims at informing you of how and why your personal data will be used during and after the recruitment process.

For the purpose of the General Data Protection Regulation ("GDPR") we use Workable as Data Controller, to assist with our recruitment process. We also use the appropriate Workable Affiliate to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

## **Changes to this Privacy Policy**

Use of the information we collect now is subject to the Privacy Policy in effect at the time such information is used. As Vesseldove evolves, we may need to update this Policy from time to time to keep pace with changes in the Service and laws applicable to us and you; we will, however, always maintain our commitment to respect your privacy.

If we make material changes in the way we use Personal information, we will notify you by posting an announcement on our website, and we may ask for your consent to such changes if required by applicable law. If you disagree with any changes in this Policy and do not wish your information to be subject to the revised Policy, you will need to close your account following the above.

#### How to contact us

Under the General Data Protection Regulation Vesseldove is the data controller for data protection purposes. If you have questions, comments or requests about this Policy and your Personal Data, please contact us by submitting a request or e-mail at:devops@vessseldove.com.

You have the right to update, reform, modify and delete your Data. You can at any time deactivate your account following the instructions above. You may contact us at the above address for any other information or objection you may have on data processing.