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## **Privacy website policy for Optimum Management**

Optimum refers to Optimum Marine Management Ltd ('OMM') and Optimum Ship Services Ltd ('OSS') and their subsidiaries. Optimum offers ship management services that include technical and operation management services for vessels and is a member of the Scorpio Group.

Optimum will act as the Data Controller in relation to all of personal data collected through the website.

On May 25, 2018, the European Union ("EU")'s new General Data Protection Regulation (the "GDPR") entered into force and has direct effect in the EU. Similar data protection laws apply in Norway, Iceland, Turkey, Switzerland and other countries.

Optimum gives great importance to personal data; when storing and transmitting data, Optimum's aim is to ensure a high level of data protection and data security. This is the reason why, Optimum considers that it is its duty to comply with the laws and regulations which govern the collection and processing of personal data. Optimum is committed to the [Data Protection Policy](#) of the Scorpio Group.

Optimum is committed to ensure that the privacy of individuals is protected. This website privacy policy (the "Policy") pertains to the personal information collected via the website.

By accessing and using the website, you confirm that (a) you have read and fully understood the Policy, (b) you agree on the collection, the use of your own and others personal information in accordance with the Policy and (c) you have authority to provide Optimum with all information submitted by you via the website, including but not limited to the personal information of third parties.

### **1. Collection:**

Your information is collected via the website, the application form ('the Form') and the Hotline (either 'OSS Hotline' or 'OMM Hotline').

Optimum collects information by which you may be personally identified, either directly or indirectly. For example, depending on the purpose of the processing activity, we collect your CV and your surname, your nationality, your first, middle names, your birth place, date of your birthday, your address, your mobile, your e-mail, information about your passport, your IP address, your report etc. (the "Personal Data").

### **2. Usage:**

Optimum uses your personal information for the operation of the website, for your recruitment and for reporting. For the operation of the website we use Cookies in the way described below under 5. For recruitment we use your personal data in the way described in our Recruiting [Data Protection Information Form](#) . For reporting we use your personal data in the way described in our [Reporting Data Protection Information Form](#) .

### **3. Disclosure and transfer:**

Optimum may transfer your personal data to its affiliates or third party associates for the purposes described above and for no further purposes.

Optimum will always take reasonable steps to ensure that such transfers comply with applicable privacy laws and will take all reasonable precautions to ensure that personal information is treated securely and in accordance with the Policy. However, you should be aware that countries outside the EU may not offer the same level of protection for personal information as EU does.

### **4. Data retention:**

Optimum retains your personal information for as long as it is necessary to fulfill the purpose for which it was obtained and as long as required to comply with applicable laws and regulations.

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## 5. Cookies:

Optimum uses a tracking technology for session authentication or settings storage where applicable (the “Cookies”). The Cookies are data sent from the web server to your browser, where they are stored for later recovery. You may find information about the type of Cookies used on our website, the type of data they collect, their purpose and time of expiry in the following matrix:

Name	Provider	Type of data	Purpose	Expiry	Type
reDimCookieHint	144.76.224.5 (server)	Cookie info	To track cookies or not	1 day	Personalization
23dc98070b54b44b6711b852e6062caa (associated with the user)	144.76.224.5 (server)	Cookie info	Used by Joomla for User related actions (e.g login)	When the browsing session ends	Session Cookie

Cookie collection may be disabled in your browser preferences. You may also configure it in such a way as to inform you of the recording of a Cookie. The Cookie storage occurs only in case you expressly agree to it. Your browser allows Optimum’s website to access only the Cookies they have installed, not those installed by other website.

## 6. Data Security:

We do our best to protect your Personal Data. We implement appropriate technical and organizational security measures to protect your personal data from unauthorized or unlawful processing and accidental loss, destruction or degradation.

## 7. Your Rights:

Under the GDPR, individuals who have their personal data collected by Optimum (the “Data Subjects”) have certain rights, including:

- a. To be informed about the collection and use of your personal data;
- b. To request from Optimum access to your personal data, or to restrict processing of your personal data, and to receive your personal data or have it transmitted to another data controller;
- c. You have the right to request that Optimum corrects your personal data on your behalf, in case such data is processed incompletely or inaccurately, provided that any modification pertaining to certain fields, (for example, bank details), requires the completion of an approval process;
- d. To request deletion or destruction of your personal data;
- e. To restrict processing of your personal data where applicable under the GDPR;
- f. To object to a processing activity that is carried out for the purposes of legitimate interests pursued Optimum; and
- g. To lodge a complaint with a relevant supervisory authority.

In addition, you may have certain additional rights under other applicable data protection laws. Optimum is committed to complying with all applicable data protection laws and will promptly respond to your requests in connection with the rights you may have in accordance with such laws.

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Data Subjects may contact Optimum by email at: [dataprotection@scorpiogroup.net](mailto:dataprotection@scorpiogroup.net) at any time.

#### **8. Changes:**

Optimum may revise the Policy at any time by amending this web page. You are expected to check this web page from time to time to take notice of any changes Optimum makes. The Policy is published on Optimum's website and is kept up to date.