# Celsius Shipping – Data Privacy Policy

Celsius Group (as defined in paragraph 1) is subject to the General Data Protection Regulation (GDPR) and the relevant local data protection regulation, for which reason you are entitled to be informed of the personal data that Celsius Group processes about you and your rights under the regulation.

# 1. JOINT DATA CONTROLLERS

### Company name

- Celsius Shipping ApS
- Celsius Management Sarl
- Celsius Shipping LLC
- Celsius Chemical Tankers LLC
- Celsius Tankers LLC
- Celsius Tech Inc.

Jointly referred to as "Celsius Group".

#### Contact info:

Celsius Shipping Aps, Philip Heymans Alle 29, 2900 Hellerup, Denmark, phone +45 45950000, email: <u>hr@celsiusshipping.com</u>

# 2. PERSONAL DATA, PURPOSE AND LAWFUL PROCESSING

# Application for position

To evaluate your application for a position at Celsius Group, Celsius Group must process and store the following personal data (*to the necessary extent*):

- Your name, address, email address, and phone number
- Date of birth (if you choose to include it)
- Your employment history, including current occupation
- Your résumé, cover letter, and other documents you choose to enclose with your application
- Any photos and/or videos you choose to submit in addition to your application
- IP address/cookie

#### **Customers & business associates**

It might be necessary for the management of our company that Celsius Group processes and stores the following personal data:

- Your name, home address, email address, and phone number.
- A copy of your national health insurance card, passport, driving license, or other photo ID these are needed to observe regulations in the Danish Anti-Money Laundering Act, legitimize your use of a power of attorney, or book travel.
- IP address/cookie.

#### Vendors

To manage our cooperation with you as a vendor, we need to process and store the following personal data:

- Your name (contact for the vendor), email address (work) and phone number (work).
- IP address/cookie.

All the data referred to above will be processed in full confidentiality in accordance with the General Data Protection Regulation.

### **Processing of data**

Celsius Group's authority to process the personal data derives from Celsius Group's legitimate interest (i) in the customer relationship and (ii) in our cooperation with you as a vendor, see article 6 (1) (f) of the General Data Protection Regulation, as well as the natural necessity of possessing personal data relating to the contract prior to entering a contract or cooperation with you. Furthermore, Celsius Group's authority to process the personal data derives from its obligation to collect and store national health insurance cards, passports, driving licenses or other photo ID to comply with the Danish Anti-Money Laundering Act, see article 6 (1) (c) of the General Data Protection Regulation and § 11, stk. 2, no. 1 of the Danish Data Protection Act. Celsius Group also has a legitimate interest, see article 6 (1) (f) of the General Data Protection Regulation, in collecting and storing national health insurance cards, passports, driving licenses or other photo ID in order to legitimize your use of a power of attorney issued by Celsius Group and to book company travel for you.

Your personal data as an applicant derives from the legitimate interest that Celsius Group has in assessing your application, and the obvious need for Celsius Group to evaluate the professional and personal qualifications of an applicant before entering an employment contract with him or her; cf. article 6 (1) (f) of the General Data Protection Regulation.

Celsius Group may share your personal data internally in the Celsius Group if Celsius Group has a legitimate interest in so doing; cf. article 6 (1) (f) of the General Data Protection Regulation.

When visiting Celsius Group's website and accepting cookies, Celsius Group processes your IP address. Celsius Group uses cookies to ensure the website's functionality and generate statistics. Celsius Group briefly processes your IP address when Celsius Group uses cookies. Celsius Group has a legitimate interest, cf. the General Data Protection Regulation, article 6, subsection 1 (f) in processing your IP address. Please also refer to Celsius Group's cookie policy, where you can read more, hereunder how to remove cookies.

# 3. RECIPIENTS AND PROCESSORS OF PERSONAL DATA

Your personal data will be processed by Celsius Group, unless other processing is relevant to the nature of the given task. Your data may be transferred to our cooperative partners or to authorities if such a transfer is necessary in connection with your cooperation with us. Passport data will be forwarded to travel agencies if Celsius Group needs to book company travel for you.

Your data may be transferred to our data processors. Your personal data may also be forwarded internally in the Celsius Group.

We normally receive the above-mentioned data directly from you. However, in certain situations, we may have obtained the information through websites in the public domain, public phone registers or network associates. In such cases, you will naturally be informed during our initial contact.

# 4. TRANSFER TO A THIRD COUNTRY

Celsius Group has parent and sister companies (within the Celsius group) and data processors in the EU, UK, US, Monaco, and Hong Kong. Accordingly, your personal data may be transferred to a third country as part of our regular procedures.

Celsius Group has ensured that appropriate and suitable safeguards have been implemented to protect your personal data. Either Celsius Group has agreed on the EU Commission's standard clauses with the recipients of your personal data, or a similar applicable standard. You can ask Celsius Group for a copy of the agreed provisions.

#### 5. RIGHT TO ACCESS, RECTIFICATION, ERASURE, RESTRICTION, DATA PORTABILITY AND OBJECTION

You are entitled to insight into the personal data Celsius Group has registered about you. If you wish to be granted such insight, Celsius Group will send you a copy of the registered data. Electronic requests will be answered electronically, and if you request several copies of your personal data, you should expect Celsius Group to charge you a reasonable fee for the related expenses paid by Celsius Group.

You are entitled to object to any processing of your personal data.

You are furthermore entitled to demand the rectification or erasure of any of your personal data as well as the restriction of the processing of your personal data.

In some cases, you are entitled to have your personal data returned or transferred to another data processor.

# Under the provisions of the General Data Protection Regulation, certain specific situations may exclude Celsius Group from the obligation to comply with the above-mentioned rights.

If you want to exercise your above-mentioned rights, you should contact Celsius Group by emailing <u>hr@celsiusshipping.com</u>.

# 6. DURATION OF STORAGE OF PERSONAL DATA

Your personal data will be erased seven years after the termination of the contract relationship/cooperation with Celsius Group. Celsius Group will store your data accordingly, to comply with the Danish Bookkeeping Act and ensure documentation if claims are raised against Celsius Group in connection with the relationship. Photo ID, including copies of passports that have been received in connection with the verification of powers of attorney, will be stored for a maximum of three years from the signing of the power of attorney.

Passport data needed for booking company travel and for verification in relation to banks, lawyers and accountants will be stored for a maximum of 12 months, after which they will be deleted.

No personal data will be stored longer than necessary for the purpose wherefore the personal data is collected, processed, and controlled. The company will not keep any personal data related to applicants for longer than 2 years.

#### 7. COMPLAINTS

You may complain against the processing of your personal data. Your complaint may be submitted to the Danish Data Protection Agency, Borgergade 28, 5<sup>th</sup> floor, 1300 Copenhagen K, Denmark, <u>dt@datatilsynet.dk</u> or online at <u>https://datatilsynet.dk/english/file-a-complaint</u>

If you have any questions about GDPR you are welcome to send an email to <u>hr@celsiusshipping.com</u>