

PRIVACY NOTICE FOR JOB APPLICANTS

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Bernhard Schulte Shipmanagement (“BSM”) consists of different legal entities, details of which can be found in <http://www.bs-shipmanagement.com/en/contact>. This privacy notice is issued on behalf of BSM so when we mention “Bernhard Schulte Shipmanagement”, “BSM”, “BSM Group” “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the BSM Group responsible for processing your data. Please note that the data controller of your personal data will be the entity that you apply to work for but also entities within BSM among which data is shared for business administration purposes. This means that we are responsible for deciding how we hold and use personal information about you. You are being provided with this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR). This notice does not form part of any contract with us and may be amended by us at any time.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided when applying with us including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, place of birth, nationality, passport details.
- Any information you have provided for recruitment purposes to a third-party recruitment agency or online media platforms, for example LinkedIn etc.
- Any information you provide to us during an interview.
- Any notes from the interview process e.g. tasks completed
- During the recruitment process, we may also collect, store and use the following "special categories" of more sensitive personal information:
 - Information about criminal convictions and offences (where required by law and only after we have made you a job offer and you have accepted that); and
 - Information about your health, including any medical condition, health and sickness records (where

required by the Maritime Labour Convention or any other applicable law and/or health and safety at work).

- Information about any disabilities for which we may need to make adjustments during the recruitment process (but only if you wish to give this to us).

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Our existing employees, as part of a referral policy.
- BSM's internal recruitment agencies.
- A background check provider, from which we may collect relevant data.
- Various police departments in respect of criminal convictions.
- Your named referees or previous employers, from whom we collect your employment history and relevant work experience information and anyone else who was identified as reference by you or identified by us when reviewing your CV (e.g. former colleagues, or suppliers).
- The data collected from third parties from a publicly accessible source, such as Flag State authorities and certification bodies.
- Online third-parties such as recruitment agencies and online media platforms such as LinkedIn.

5. HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the job advertised or any other job we may consider you for.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- To keep you posted on the recruitment process.
- Use it for statistical purposes on our recruitment/ hiring process.
- Share it with the hiring manager or any other employee who will be involved in the selection process
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Analyse our interaction with candidates.

It is in our legitimate interests and essential to our business, to collect personal data that allows us to determine a persons' suitability for employment. Furthermore, the processing of your personal data enables us to decide whether to enter into a contract of employment with you.

Having received your CV and covering letter **OR** your application and the results from any tests which you take as part of our hiring process, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role we have advertised or any other roles we may consider you for. If you do meet our requirements, we will decide whether your application is strong enough to invite you for an

interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you a role. If we decide to offer you a role, we may then take up references **AND/OR** carry out a criminal record check before confirming your appointment, if it is required by law.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- For our seafarers, we may use medical data to consider whether you are fit for a specific role on-board a ship. It is required by law that all our seafarers are in adequate physical health and it is our responsibility to ensure you meet the standards.
- For shore staff, we may use medical data to consider if you are eligible for a role which involves frequent travelling and to determine if you are fit to visit our managed vessels.

6. INFORMATION ABOUT CRIMINAL CONVICTIONS

If it is required by law, before we offer you a role, we may collect information about your criminal convictions history. In particular, we may require criminal background checks for certain roles-for example those working with minors or on board cruise vessels.

7. DATA SHARING

Why might we share your personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

- Internal third parties being other companies in the BSM Group which are based in EU as well as in Non-EU countries, if you are applying for a role in a jurisdiction other than the one you are based in, or if you are a seafarer and wish to be employed on any of our managed vessels. We also share your personal information with our internal third parties in case they are looking for candidates with professional backgrounds similar to yours. For the full list of entities which form part of the BSM Group, with their geographical location, please visit <http://www.bs-shipmanagement.com/en/contact>.
- Clients, who may require your personal information for recruitment purposes, such as our ship management clients who require information on the seafarers on-board their vessels.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party

service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. INTERNATIONAL TRANSFERS

As explained above, we share your personal data within the BSM group and with clients who require information on the seafarers on-board their vessels. This will involve transferring your data outside the European Economic Area (“EEA”). Not all countries provide the same level of protection in relation to personal information as within the EEA. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information. This will include having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained by contacting us at privacy@schultegroup.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. DATA RETENTION

How long will we use your information for?

We will retain your personal information for 2 years if you are applying for a role on-board one of our vessels and 1 year if you are applying for a role in one of our offices (ashore). We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will ask you separately, to provide your explicit consent to us to retain your personal information for a fixed period on that basis.

11. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are

lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact privacy@schultegroup.com in writing.

12. RIGHT TO WITHDRAW CONSENT – RIGHT TO STOP APPLICATION PROCESS

If you no longer want us to process your job application, please contact privacy@schultegroup.com. We will then no longer process your application and, subject to our retention policy, we will dispose of your personal data securely. Similarly, where processing of your personal data is based on your consent, such as when you give permission to us to keep your data in our database in case a position opens that closely matches your skills and experience, you have the right to withdraw your consent for processing for that purpose at any time by contacting us at the above e-mail. Once we have received notification that you have withdrawn your consent, we will no longer process your data and, subject to our retention policy, we will dispose of your personal data securely.

13. CONTACT DETAILS

If you have any questions about this privacy notice or how we handle your personal information, please contact our privacy team at privacy@schultegroup.com. You have the right to make a complaint at any time to the concerned supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.