	PRIVACY NOTICE & DATA PROTECTION POLICY		
	No. MAC-QD-011	Revision: 4	Approved: NF

1. Absolutes and Ethics

Maritime Assurance & Consulting (MAC), a Bureau Veritas Group company, is in business to make the world safer and fairer. Our shared vision within Bureau Veritas is to be the most respected testing, inspection and certification company in every country in which we operate. Our Code of Ethics and our Absolutes provide the foundation for the way we work and how we realise our vision. Acting with the utmost integrity is a cornerstone of our Code of Ethics, compliance with which is one of our three Bureau Veritas Absolutes.

Our Absolutes:

- Safety
- Compliance with our Code of Ethics
- Financial Control

2. Data Safety

The General Data Protection Regulation 2016 (GDPR) updates the rights European citizens have about the way that their data is handled. The GDPR has been enacted into UK law as the Data Protection Act 2018. MAC collects and processes data about our employees and Associate Consultants predominantly but also about our clients, client subcontractors, our suppliers and certain other third parties. Much of the processing MAC undertakes is that required to perform its obligations as an employer. We also collect and retain certain information about third parties such as Associate Consultants, employees of our clients and potential clients to fulfil our contractual promises to them.

At MAC we understand that the importance of keeping this data in a lawful manner is vital to maintain the credibility of our organisation and to ensure individuals' confidence in us.

This Policy will identify what sort of information might be classed as "personal data" and details your rights in respect of this information.

MAC processes the following personal information in accordance with the lawful basis, as detailed in Table 1.

Table 1 Personal Information Processing at MAC

Personal Data	Supplied From	Shared With	MAC Processing	Most Appropriate Lawful Basis
Staff	Themselves BV HR	Clients Associate Consultants Vessel Crew Suppliers BV	Client Correspondence ¹ Internal/external correspondence ² HR (including payroll) Inductions Certificates & medicals Passports & Visas Competency Assessment CVs	Consent ³



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Personal Data	Supplied From	Shared With	MAC Processing	Most Appropriate Lawful Basis
Associate Consultants	Themselves Other Associate Consultants Staff	Staff Clients Other Associate Consultants Clients' subcontractors Suppliers BV	Client Correspondence ¹ Internal/external correspondence ² BV (AVL, invoicing & payment) Induction Certificates & medicals Passports & Visas Competency Assessment CVs	Consent ³
Client Subcontractors (Vessel Crew)	Themselves Staff Associate Consultants Clients	Staff Associate Consultants Clients Clients' subcontractors	Client Correspondence ¹ Internal/external correspondence ²	Legitimate Interest ⁴
Client	Themselves Staff Associate Consultants Client Subcontractors	Staff Associate Consultants Clients' subcontractors BV	Client Correspondence ¹ Internal/external correspondence ²	Contract ⁵
Suppliers	Themselves BV AVL	BV	Client Correspondence ¹ Internal/external correspondence ²	Contract ⁵
Parent Company (BV)	Themselves	Staff Clients Clients' subcontractors Associate Consultants	Client Correspondence ¹ Internal/external correspondence ²	Legitimate Interest ⁴

Notes:

- It should be noted that "Client correspondence" is used to describe the process of working with Clients and their subcontractors (vessels etc.). Processing covers the Project process flowcharts and other select processes in MAC'S Business Management System (BMS). The title of the process describes the type of operation being performed:

Project Processes

- Enquiry & Setup
- Proposal Process
- Customer Purchase Order Filing
- Project Process
- On Site Process
- Report Process
- Certificate of Approval
- Breach of Warranty
- Design & Development Process
- Operational Control
- Conflict of Interest

HSEQ Processes

- Auditing
- Control of Records & Data
- Customer Feedback and Complaints

Finance Processes

- Invoicing
- Credit Control

Business Development Process

- Business Development Process



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2. "Internal/External Correspondence" refers to the support process flowcharts in the BMS that support the Project Processes. Internal/external correspondence also includes correspondence with BV, suppliers and Associate Consultants, i.e. external third parties. The support processes are as follows:

Administration Processes	Business Development Process	Finance Processes	HR Processes
IT Support & Electronic IT Communications Equipment Timesheet Portal	Business Development Process	Invoicing	Appraisal
Logistics Purchasing	HSEQ Processes Policy Development Organisational Development Planning Implementing Measuring Performance Reviewing Performance	Expenses – Rechargeable Expenses – Suppliers Occupation Rate Review Credit Control Month End Report	Recruitment and Selection Legislative Change of Employee Conditions of Work Competency Absence New Employee Induction Recruit New Personnel
Returns Annual Leave Associate Consultant Induction Offshore Certificate Tracking Document Control	Auditing Control of Records & Data Customer Feedback and Complaints Management of Change Medical Surveillance		
Website Updates and Amendments			

3. Consent: The individual has given clear consent to MAC to process their personal data for a specific purpose.
4. Legitimate interests: The processing is necessary for MAC's legitimate interests or the legitimate interests of a third party.
5. Contract: The processing is necessary for a contract MAC have with the data subject, or because processing is required in order to take specific steps before entering into a contract with the data subject.


3. Personal Data

Personal data is information that identifies you either from that data alone or by that data plus other information MAC processes. It can be a statement of fact, for example date of birth, or an opinion.

Personal data processed by MAC can include:

- Your name, address or telephone number.
- Your work experience, professional qualifications and training.
- Your bank account details (for employees and Associate Consultants).
- Your passport details (for employees and Associate Consultants).
- Company information/insurance details (for employees and Associate Consultants).
- Your medical information (for employees).
- Your next of kin details (for employees).
- Your National Insurance number (for employees).

This information will be shared with Clients, the Clients' subcontractors (vessel owner/operators, vessel crews, etc.), MAC's parent company Bureau Veritas, other MAC employees and staff, and MAC's Travel Agent as appropriate and in accordance with the Data Protection Act 2018.

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Sensitive data may also be processed by MAC and can include any of the following:

- Racial or ethnic origin of the data subject.
- Political opinions.
- Religious beliefs or other beliefs of a similar nature.
- Trade union membership.
- Physical or mental health or condition.
- Sexual life.
- The commission or alleged commission by the data subject of any offence.
- Any proceedings for any offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.

It is occasionally necessary for MAC's Travel Agent to provide personal and sensitive data to service providers (based in EEA and outside of the EEA) to provide travel booking, meet and greet and visa application services.


4. Compliance

MAC complies with the Data Protection Act 2018 when collecting or processing personal data. We will:

- Process personal data in a fair, transparent and legal way.
- Tell people what we are doing with their personal data and not use it for anything other than that.
- Seek to minimise the personal data we process and hold.
- Take steps to make sure that the personal data we do hold is accurate and up to date.
- Destroy the personal data when we no longer need it in line with relevant retention policies.
- Keep all personal data secure.
- Take steps to ensure that we only share personal data with organisations who are also committed to upholding your rights.
- Never knowingly collect or process personal data about children.
- Never sell your data to a third party, for any reason.

We will not share information about you with third parties without your consent unless the law allows us to. We are required, by law, to pass on some of this personal data for law enforcement purposes:

- The prevention or detection of crime.
- The apprehension or prosecution of offenders.
- The assessment or collection of tax or duty.

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5. Consent

Staff and Associate Consultants must give their consent to MAC, for processing of personal information.

MAC will not record your information unless you complete the consent form.

We will not share your information with anyone else without your consent, unless required to do so by law.

6. Legitimate Interests

MAC processes personal data from vessel crews and from the parent company, Bureau Veritas.

The personal data of vessel crews, particularly their name, rank, date of birth, nationality/place of birth and identity is included in the form of an "IMO Crew List". This list is included in vessel inspection/survey reports issued to the Client to show that the vessel is adequately manned in accordance with the Minimum Safe Manning Document and to communicate the make-up and profile of the crew to the Client. The IMO Crew List also shows that personnel have adequate identification for compliance with the ISPS Code and are therefore suitable for visiting the Clients' offshore locations or facilities. MAC provides this information directly to the Client and may supply it back to the vessel as part of the survey/inspection report.

The crew's personal information is held securely on MAC's shared network drive, which may only be accessed by staff. Hard copies of the IMO Crew List are disposed of as confidential waste.

7. Access Rights


Any individual (data subject) may request the following in relation to the processing of their personal information at MAC:

- Access to their personal information.
- Rectification of their personal data if they deem it inaccurate or incomplete.
- To block or restrict editing of their personal information.
- To move, copy or transfer their personal data from one IT environment to another in a safe and secure way, without hindrance to usability.
- To handle an individual's objection to the processing of their personal data.

The HSEQ Manager (MAC's designated Data Protection Officer (DPO)) will consider each request and contact the individual involved to explain the nature of the individual's data held on record with a view to supplying all the information the individual so desires, rectifying any inaccuracies/incomplete personal information, to confirm how MAC will block/restrict editing, identify how the data may be transferred from one IT environment in a safe and secure way or handle an objection.

The individual must supply identification, i.e. passport, driver's licence, to permit processing of the request. It may be necessary to charge for this service if the request is manifestly unfounded, excessive or repetitive, as determined by the DPO. This fee is based on the hourly rate for document control and administration of £45/hour. Information must be supplied within one calendar month of the request, which can be extended to two months for more complex or numerous requests.

MAC ensures that personal information is recorded in a commonly used and machine-readable format or can be transferred to suitable transfer formats, such as CSV and XML files.

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The record of your personal data will be stored in a shared electronic system accessed by members of the Administration, Senior Management and Bureau Veritas. Paper copies of your data may also be stored securely by the Admin department.

If you require more information about how we store and use your personal data, please contact MAC's DPO:

Fergus Napier, HSEQ Manager

E-mail: fnapier@mac-l.com

Tel: +44(0)1224 577 070