

# PRIVACY POLICY FOR PIONEER MARINE EMPLOYEES

## 1. Introduction

As your employer, the Company needs to keep and process information about you for normal employment purposes. We are committed to safeguarding the privacy of the personal information that we gather concerning our prospective, current and former employees (“**you**” or “**employees**”) for management, human resources and payroll purposes.

We will keep and use your personal information to enable us to run the business and manage our relationship with you efficiently, lawfully and appropriately during the recruitment process, while you are working for us, the time when your employment ends and after you have left. As a Pioneer Marine employee (or prospective employee), you understand and acknowledge that we collect, use and disclose your personal information in accordance with this Privacy Policy for Employees (this “**Policy**”).

## 2. The Application of this Policy

This Policy applies to employees’ personal information and to the use of that personal information in any form – whether oral, electronic or written.

References to “Pioneer Marine”, “we” and “our” throughout this Policy, depending on the context, collectively refer to the entity with which you have or may have an employment relationship, e.g. Pioneer Marine Hellas S.A., Pioneer Chartering S.A. and/or any other affiliated company of the group of companies of Pioneer Marine.

Your personal information will be processed for the purposes set out in Section 4 below.

If you agree to this Policy you are, to the extent required under local law in some jurisdictions, granting your express and written consent to the processing of any personal information that you provide Pioneer Marine that is considered to be Sensitive Personal Information (as described in Section 3) or is considered to be financial information.

## 3. The Types of Personal Information We Process

The term “**personal information**” in this Policy refers to information that does or is capable of identifying you as an individual. The types of personal information that we process (which may vary based on the nature of the employee’s position and duties) include:

- name, gender, home address and telephone number, date of birth, photograph, marital status, emergency contacts;
- residency and work permit status, military status, nationality and passport information;
- social security or other taxpayer identification number, banking details;
- sick pay, pensions, insurance and other benefits information (including the gender, age for any spouse, minor children or other eligible dependents and beneficiaries);
- Employment date(s), dates(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training courses attended;
- clothing sizes, as well as clearance to perform on board duties;
- records of work absences, vacation entitlement and requests, salary history and expectations, performance appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing Pioneer Marine policies);

- where permitted by law and proportionate in view of the function to be carried out by an employee or prospective employee, the results of criminal background checks, the results of drug and alcohol testing, screening, health certifications, driving license number, vehicle registration and driving history;
  - information required to comply with laws, the requests and directions of law enforcement authorities or court orders (*e.g.*, child support or debt payment information);
  - acknowledgements regarding Pioneer Marine policies, including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies;
  - information captured on security systems, including CCTV and key card entry systems and other security and technology systems, to the extent permitted by applicable law;
  - voicemails, emails, correspondence and other work product and communications created, stored or transmitted by an employee using Pioneer Marine's computer or communications equipment (although correspondence exchanged using Pioneer Marine's equipment but using personal addresses is only processed to the extent permitted by applicable law);
  - date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (*e.g.*, references); and
- There may be instances in which the personal information that you provide to us or we collect is considered Sensitive Personal Information under the privacy laws of some countries. Those laws define "Sensitive Personal Information" to mean personal information from which we can determine or infer an individual's racial or ethnic origin, membership in a professional association, physical or mental health or condition (including information concerning the commission or alleged commission of a criminal offence). We only process Sensitive Personal Information in your jurisdiction if and to the extent permitted by applicable law.

#### 4. How We Use Personal Information

We may collect, use and disclose personal information concerning employees in order to:

- evaluate applications for employment;
  - manage all aspects of an employee's employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses, development and training, absence monitoring, performance appraisal, disciplinary and grievance processes and other general administrative and human resource-related processes;
  - develop manpower and succession plans;
  - maintain sickness leave records;
  - protect the safety and security of Pioneer Marine staff and property (including controlling and facilitating access to and monitoring activity in secured premises and activity using Pioneer Marine computers, communications and other resources);
  - investigate and respond to claims against Pioneer Marine and its staff;
  - conduct employee opinion surveys and administer employee recognition programs;
  - administer termination of employment and provide and maintain references;
  - maintain emergency contact and beneficiary details (which involves Pioneer Marine holding information on those you nominate in this respect); and
  - comply with applicable laws (*e.g.*, health and safety), including judicial or administrative orders regarding individual employees (*e.g.*, garnishments or child support payments).
- There are Closed Circuit Television (CCTV) cameras in operation within and around our premises, which, depending on the applicable laws, may be used for the following purposes:
- to prevent and detect crime;
  - to protect the health and safety of Pioneer Marine staff;

- to manage and protect Pioneer Marine’s property and the property of Pioneer Marine’s staff and other visitors; and

We may monitor Internet use and communications in accordance with applicable laws and Pioneer Marine’s Acceptable Use Policy for Information Technology Resources and any other acceptable use policies that may replace, amend or supplement that policy from time to time.

We may retain certain personal information of employees after their employment ends for any residual aspects of the purposes set out above. We will only retain such personal information for as long as it is necessary and in all cases for no longer than permitted by applicable law.

Unless otherwise stated, all personal information we request from you is obligatory. If you do not provide and/or allow us to process all obligatory personal information as requested, we will not be able to keep complete information about you, thus affecting our ability to accomplish the purposes set out above

## **5. Disclosures of Your Personal Information**

### **5.1. General**

In order to carry out the purposes outlined above, information about you will be disclosed for the purposes set out above to human resources staff, line managers, consultants and other appropriate persons in our offices.

### **5.2. Our Agents, Service Providers and Suppliers**

Like many businesses, for purposes always connected with your employment or the management of the company’s policies, we outsource the processing of certain functions and/or information to third parties. When we do outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information in accordance with the terms and conditions of this Policy, with appropriate security measures.

We may share your information with Travel agents, Payroll Service providers, Insurance companies and brokers, and Cards printing providers.

### **5.3. Legal Requirements**

We are obligated to disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We are also obligated to retain personal information collected and to process such personal information to comply with accounting, tax rules, regulations and any specific record retention laws.

## **6. Centralized Data Processing Activities**

Like most international businesses, we have centralized certain aspects of our data processing and human resources administration in accordance with applicable laws in order to allow us to better manage our business. That centralization may result in the transfer of personal information from one country to another. Whenever your personal information is transferred within Pioneer Marine, your personal information will be processed in accordance with the terms and conditions of this Policy and applicable laws of the European Union or the legislation of its member states that is applicable to Pioneer Marine.

## **7. Updating or Accessing Your Personal Information**

With some limited exceptions, you may inquire about the personal information we maintain about you by sending us a written request by letter or email to the address set out in Section 10 below. Please be sure to include your full name, current (or last) job title and

place of employment with Pioneer Marine and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and the personal information we maintain about you. We may not disclose data that you are not entitled to receive under applicable laws (e.g., data revealing information about another individual). We reserve the right to charge you a fee, if (and to the extent) permitted under applicable law, for processing any such request. Where you make more than one request in quick succession, we may respond to your subsequent request by referring to our earlier response and only identifying any items that have changed materially.

You may request that we correct, delete or stop processing, personal information that we hold about you on legitimate grounds by sending a letter or email to the address set out in Section 10 below. If we agree that the information is incorrect, or that the processing should be stopped, we will delete or correct the information. If we do not agree that the information is incorrect, we will tell you that we do not agree and record the fact that you consider that information to be incorrect in the relevant file(s). In the event, you re

quire for the company to stop processing your data, you have the right to withdraw your consent initially provided, however, such withdraw will not affect the lawfulness of the processing prior your consent was withdrawn.

#### **8. Protecting Your Personal Information**

The personal information we collect from you is stored by use and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot guarantee the prevention of loss, misuses or alteration of personal information and we cannot guarantee any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you, so that you can take the appropriate actions for the due protection of your rights.

#### **9. Changes to this Policy**

This Policy may be amended from time to time. The effective date of this policy is set out at the end of this document.

#### **10. Request for Access to Personal Information / Questions or Complaints**

If you have any questions about this Policy, about the processing or your personal information as described herein, or any concerns or complaints with regard to the administration of the Policy, or if you would like to submit a request (in the manner described in Section 7 above) for access to the personal information that we maintain about you, please contact us by any of the following means:

- for current employees, by contacting your line manager or your human resources department; and
- for applicants and former employees, by contacting Pioneer Marine's Human Resources Department at [careers@pioneermarine.com](mailto:careers@pioneermarine.com).

All requests for access to your personal information must be submitted in writing by letter or email. We may respond to your request by letter, email or any other suitable method.

Effective Date: December 2018

