

## PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy is written in accordance with the EU General Data Protection Regulation (GDPR) that comes into force from May 2018.

**Premiumfocus Nautilus Ltd's** main activity is to offer Maritime Security Services providing privately contracted armed security personnel on board ships in transit across international waters. As a provider of such professional services and products it is likely **Premiumfocus Nautilus Ltd** to collect, hold and process considerable amount of information of its clients and other interested parties which may include personal information/data. **Premiumfocus Nautilus Ltd** is dedicated to protecting the personal data that come under its knowledge.

The present Personal Data Protection Policy explains how **Premiumfocus Nautilus Ltd** collects, stores, uses, shares and protects the personal data that obtains.

Personal data means any information concerning individuals, including but not limited to first and last names, mailing address, email address, contact telephone number, photographic recording, video and/or voice recording, etc., which identifies or can identify an individual (hereinafter "Personal Data" or "Data").

**Premiumfocus Nautilus Ltd** collects personal data only when it is absolutely necessary for the provision of services. Data are used solely and exclusively for the purposes for which they were collected and they are limited to data explicitly provided by the individuals for a specific purpose subject to their consent.

We provide our services to legal entities and not to individuals therefore we are aiming in collecting the necessary company data of our clients and potential clients for the efficient and quality planning of the provision of services. Part of these data may be personal data as explained above and are provided by the persons representing or acting on behalf of our clients and potential clients.

Another type of personal data is the information included in the resumes or CVs that are submitted in soft or hard copy by applicants to work at **Premiumfocus Nautilus Ltd** or on behalf of it, i.e., security contractors.

The personal data are processed only by authorized **Premiumfocus Nautilus Ltd** staff and contracted personnel that acknowledge the responsibility to ensure the confidentiality and protection of the individuals' data and process them solely and exclusively for the purposes for which they were provided.

### PRIVATELY CONTRACTED ARMED SECURITY PERSONNEL (PCASP) PERSONAL DATA

As an employer of PCASPs, **Premiumfocus Nautilus Ltd** is obliged to collect personal data and keep records of PCASPs that hire.

**Premiumfocus Nautilus Ltd** obtains the personal information that the individuals provide (in soft or hard copy) for employment purposes, by several means such as direct e-mails they send to the company, by having applied to associated agents or having already been employed by **Premiumfocus Nautilus Ltd**.

This information may include but not limited to a PCASP name, address, e-mail, telephone number, date of birth, education, working experience and other information relevant to seeking job opportunities, etc. We treat all such information as personal data for the purposes of complying with Legislation.

If we do not offer a suitable position for the applicants at the time of their application, and if their profile is of our interest and we just have no current offer in place, we will store the personal data for 2 years and then we will destroy them. However; if any one of the applicants wishes to withdraw the data earlier he must request it in writing by sending an e-mail to [admin@nautilusmss.com](mailto:admin@nautilusmss.com).

We need the PCASP details for the purpose of matching their qualifications with the **Premiumfocus Nautilus Ltd** job specifications and in order to provide them with information about possible employment.

PCASP information will be stored in secure electronic files and will only be shared with relevant associated Companies of **Premiumfocus Nautilus Ltd** in order to manage a mission, such as travel agencies, accommodation suppliers, port suppliers.

Once a PCASP's employment with **Premiumfocus Nautilus Ltd** is confirmed, it might be needed that we will require some additional data with regards to the forthcoming employment.

In case that a PCASP refuses to provide the additional data he will not be allowed to proceed to the employment.

It is the nature of our business to collect also "sensitive" personal information in order to proceed with employment. Sensitive information includes for example personal information regarding physical or mental health, non-criminal record (such information is required by the Law and industry standards). By providing sensitive information to **Premiumfocus Nautilus Ltd**, a PCASP consents **Premiumfocus Nautilus Ltd** to access, process, use, transfer and store this information for its legitimate business purposes.

Furthermore, we may use PCASP personal data for establishing future contact with them.

By providing **Premiumfocus Nautilus Ltd** with their personal data, PCASP agree and accept that we provide it to third parties for uses related to **Premiumfocus Nautilus Ltd** business activity such as:

- Ship managers/ Ship owners and ship officers.
- **Premiumfocus Nautilus Ltd** external partners and associated companies.
- Competent authorities that have legitimate rights related to their employment,
- Port agencies for the purpose of arranging embarkation / disembarkation.
- Courts, statutory or governmental order, decree, search warrant or similar request presented to **Premiumfocus Nautilus Ltd** by any law enforcement or regulatory body.
- Bank institutions for the purpose of the transfer of their salary.
- Organizations and authorities which must be informed in accordance with statutory duties or which arise under the performance of certain duties.
- Any other legitimate business reason as required or permitted by law or professional standards.
- Any other PCASP and/or Team Leader in the context of knowing his team.
- Vessel's Master.

**Premiumfocus Nautilus Ltd** will not sell or transfer any personal data to a third party for their direct marketing use.

**Premiumfocus Nautilus Ltd** applies reasonable security measures and policies to protect the personal data from unauthorized access, loss, disclosure, or amendment.

The access to the personal data is limited to those who have a need to know.

We implement information security procedures applicable for the physical protection of our premises and hard copy files and for the protection of the electronic data that are stored in our company server in dedicated and well-defined folders.

Any individual has the right to see what data we hold about the individual. In this case we may ask proof of the individual's identity and will answer any request within 30 calendar days, free of charge.

Any individual can ask us to not process his/her personal data. He/she has the right to object the processing of his/her personal data if we are not entitled to use them or to have his/her information deleted, although this action will lead to his/her immediate termination of employment.