



**BREMER BEREEDERUNGS
GESELLSCHAFT** mbH & CO. KG

International Ship Management

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DATA PRIVACY STATEMENT

Bremer Bereederungsgesellschaft mbH & Co. KG (BBG)

The protection of data privacy is very important for BBG and the processing of personal data is made in compliance with the EU General Data Protection Regulation (GDPR). This Data Privacy Statement explains to which extend and which kind of personal data is being collected/used/processed BBG, just as the purpose of such as well as the rights of data subjects.

The Controller according to the GDPR and other effective Data Privacy provisions within the EU is:

Bremer Bereederungsgesellschaft mbH & Co. KG

Hermann-Hollerith-Str. 10; 28355 Bremen, GERMANY.

Data Privacy contact: [datasecurity@bbg-shipmanagement.com]

The designated Data Protection Officer (external company) is:

Thilo Noack

SharedIT Professional GmbH & Co. KG

Saebystrasse 17a; 24576 Bad Bramstedt; GERMANY.

Email: thilo.noack@shared-it.de

For enforcement of rights related to Datasecurity or in case of questions about usage, collection or processing of personal data please approach: datasecurity@bbg-shipmanagement.com

1. Definitions

The BBG Data Privacy Statement is based on terms of the GDPR. As this statement shall easily be readable and understandable for customers and business partners, some definitions need to be given right at the beginning. The following terms are being used in this Data Privacy Statement:

a) Personal Data

Personal data means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

b) Data Subject

A data subject is any identified or identifiable natural person, whose personal data will be processed by the Processor.

c) Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of Processing

Restriction of processing means the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

f) Pseudonymisation

Pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

g) Filing System

Filing system is a structured collection of personal data, accessible based on certain criteria, independent from a centralized, decentralized or geographically administration of the collection.

h) Controller or Controller for the Processing

The Controller or the Controller for the Processing means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law.

i) Processor

The Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

j) Recipient

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

k) Third Party

Third party means a natural or legal person, public authority, agency or body other than the data subject, Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorised to process personal data.

l) Consent

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Lawfulness of processing

Processing shall be lawful only if and to the extent that at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

3. Information about collection of personal data

Hereafter we inform you about the personal data that is being collected when using our website. Personal data is e.g. Name, Address, E-Mail Address, user behaviour.

Viewing the Website

When accessing this website for information purpose, without registering or providing and other information, we only collect personal data that the Internet browser used by the visitor automatically sends to the server of this website. If you want to view our website we collect the following personal data that is required to ensure a stable and secure access:

- a) IP address of the visitor's terminal,
- b) Date and time of access by the visitor,
- c) Time difference to GMT
- d) Content viewed
- e) Access status / HTTPS status code
- f) Transferred data volume
- g) Website sending the request



- h) Browser
- i) Operating system
- j) Language and version of the browser

The processing of these personal data is in accordance with Article 6 (1) 1. f) of the GDPR. Our company has a legitimate interest in data processing for the purpose of

- a) quickly build the connection to the website,
- b) to enable a user-friendly application of the website,
- c) to identify and ensure the safety and stability of the systems and
- d) to facilitate and improve the administration of the website.
- e) The processing is expressly not for the purpose of gaining knowledge about the person of the visitor of the website.

Cookies

In addition to the data collected as mentioned above, technologies like website cookies or pixels (hereinafter 'cookies') will be used on your device. Cookies are small text files that contain certain information, stored by your browser on your device. Upon the next access to our website, the information stored in the cookies is sent back to our site.

The stored and returned data is used to recognize the browser that was used for the last access and ensures the website being set as per your preferences. Only the cookie on the used device will be identified. Additional collection / storage of personal data is done only after your consent or if required to use the service. The website uses the following types of cookies:

- a) Imperative cookies
- b) Functional and performance cookies

We will inform you which tools are setting which type of cookies.

Imperative cookies

Imperative cookies guarantee functions that are vital for using our website. We are the sole processors and therefore those are First Party Cookies. All information contained in those cookies is returned to our website.

Utilization of imperative cookies is done without further consent and therefore cannot be deactivated. However, you have the possibility to deactivate cookies in your browser in general. Legal basis: GDPR 6 (1) b)

Functional and performance cookies

Functional cookies enable our website to store and recognize data and settings (like selection of the language) and offer personalized functionality. Those cookies collect anonymized data only so no tracking via other websites is done.

Performance cookies gather information on how our website is used in order to offer better content and functionality. Information gathered includes the visited sub-pages, amount of accesses to our site, time spent on and order of visiting sub-pages, search terms, location from that our site was accessed, share of mobile devices used, mouse clicks and scrolls. The IP address is transmitted automatically for technical reasons but anonymized and does not enable us to identify single users. Legal basis: GDPR 6 (1) f)

Use of Google-Fonts

The responsible processor integrated Google-Fonts on this website, free-to-use Fonts that can be used when designing websites. This site uses web-fonts from Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). When accessing this site, the browser loads the required web-fonts into the browser cache in order to show fonts correctly. For that purpose the used browser has to establish a connection with the Google servers. Hereby Google becomes aware that our website was visited from the IP of the visiting person. Google web-fonts are used to ensure a uniform presentation of our online service. Legal basis GDPR 6 (1) f. In case the browser does not support Google web-font, a standard font from the visitor's computer will be used.

In course of processing, data may be transmitted to the USA. The transmission is secured by so-called standard-contractual-clauses. Those guarantee that processing of personal data is secured by a certain level of security in line with the GDPR. The provider signed the data protection clauses prevailing in the EU <https://ec.europa.eu/info/law/law-topic/data-protection/publications/standard-contractual-clauses-controllers-and-processors>.

In case the standard-contractual-clauses are insufficient to guarantee an adequate level of security, your consent as per GDPR 49 (1) a may serve as legal basis for transmission of data to third-countries.

Further information on Google web-fonts can be found at <https://developers.google.com/fonts/> and in Googles privacy policy <https://www.google.com/policies/privacy>.

Gstatic

Our website uses a web service from Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland ("Gstatic"). The data is used to guarantee functionality of our website. In this context your browser may transmit personal data to Gstatic. Legal basis: GDPR 6 (1) f). The rightful interest is covered by ensuring correct functionality of our website. The provider signed the data protection clauses prevailing in the EU (<https://ec.europa.eu/info/law/law-topic/data-protection/publications/standard-contractual-clauses-controllers-and-processors>). The data is deleted once the objective of collecting is fulfilled.

Further information on handling of the transmitted data can be found in the Gstatic privacy policy <https://policies.google.com/privacy>. You may prevent the collection and processing of the data by blocking the execution of scripts in your browser.

Storage duration of personal data

The storage duration is determined by the legal retention period. Once the deadline expired the data is deleted, provided that the data is no longer required for fulfilling a contract, your consent was not revoked or you did not contradict the procession.

4. Rights of the Data Subject

Revoking consent

If the processing of personal data is based on your consent, you have the right to revoke that consent at any time. By revoking the consent, the legal basis for processing personal data from the time of consent until the time of revoking the consent is not affected.

Right of confirmation

As per European Regulations, you have the right to obtain a confirmation from BBG as to whether or not personal data concerning you is being processed. If a person concerned wants to make use of the right of confirmation, the above contact details can be used.

Right of information

If your personal data is being processed, the European Regulations affords the right to obtain information from BBG anytime and free of charge as to your personal data that is being processed. In addition, you are entitled to have access to the following information:

- f) The purposes of the processing;

- g) The categories of personal data concerned;
- h) The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- i) Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- j) The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- k) The right to lodge a complaint with a supervisory authority;
- l) Where the personal data are not collected from the data subject, any available information as to their source;
- m) If applicable, the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;

If personal data is transferred to a third country or to an international organisation, you have the right to be informed of the appropriate guarantees in accordance with Article 46 GDPR in connection with the transfer. A copy of the personal data that is subject to processing can be provided. Based on administrative costs, an appropriate fee may be charged by BBG for any additional copies that may be requested. If an application will be submitted electronically, the information shall be provided using a common electronic format, unless otherwise specified. The right to obtain a copy according to paragraph 3 shall not impair other person's rights and freedoms.

Right to rectification

As per European Regulations, you shall have the right to obtain the rectification of inaccurate personal data concerning you from BBG without undue delay. Furthermore, you shall have the right to have incomplete personal data completed, which can also be made by means of providing a supplementary statement.

If a person concerned wants to make use of the right of rectification, the above contact details can be used.

Right to erasure (right to be forgotten)

As per European Regulations, you shall have the right to obtain the erasure of personal data concerning you from BBG without undue delay, where one of the following grounds applies and a processing is not required:

- a) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) The data subject withdraws consent on which the processing is based according to point a) of Article 6 (1) GDPR, or point a) of Article 9 (2) GDPR, and where there is no other legal ground for the processing;
- c) The data subject objects to the processing pursuant to Article 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2) GDPR;
- d) The personal data have been unlawfully processed;
- e) The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) The personal data have been collected in relation to the offer of information society services referred to in Article 8 (1) GDPR

If any of the above reasons are applicable and a person concerned wants to make use of the right of erasure for personal data being saved by BBG, the above contact details can be approached. It will be initiated that the erasure request will be complied without undue delay.

Where personal data has been published by BBG and our company is obliged to erase the personal data as per Article 17 (1) GDPR, BBG, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform Controllers who are processing the personal data that the data subject has requested the erasure to delete all links to, or copies or replications of such personal data.

Right to restriction of processing

As per European Regulations, you shall have the right to obtain restriction of processing from the BBG where one of the following applies:

- a) The accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;

- b) The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) The Controller no longer requires the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;
- d) The data subject has objected to processing pursuant to Article 21 (1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted in accordance with the conditions set out above, such personal data shall only be processed – apart from being stored – with your consent or for purposes of asserting, exercising, or defending legal claims or for protecting the rights of another natural or legal person or on grounds of an important public interest of the Union or of a Member State.

For exercising the right to restrict processing, you may use the contact details provided above.

Right to data portability

As per European Regulations, you shall have the right to receive the personal data concerning yourself, which you have provided to the Controller, in a structured, commonly used and machine-readable format. Also, you have the right to transmit those data to another Controller without hindrance from the Controller to which the personal data have been provided, where the processing is based on consent pursuant to point a) of Article 6 (1) GDPR, or point a) of Article 9 (2) GDPR, or on a contract pursuant to point b) of Article 6 (1) GDPR, and the processing is carried out by automated means. However, that right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

In exercising your right to data portability as per above, you shall further have the right to have the personal data transmitted directly from one Controller to another, where technically feasible and as long as this does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, you may use the above contact details.

Right to object

As per European Regulations, you shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point e) or f) of Article 6 (1) GDPR. This also includes profiling based on those provisions.



In case of an objection, BBG is no longer processing the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Where personal data is processed by BBG for scientific or historical research purposes or statistical purposes pursuant to Article 89 (1) GDPR, you shall have the right to object to processing of personal data concerning yourself on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In exercising your right to object, the above contact details can be approached. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may additionally exercise your right to object by automated means using technical specifications.

[Automated individual decision-making, including profiling](#)

As per European Regulations, you shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning yourself, or similarly significantly affects you. However, this does not apply if the decision is necessary for or is authorised by

- a) entering into, or performance of a contract between you and a data Controller;
- b) Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests;
- c) if the decision is based on the data subject's explicit consent.

If the decision is required to enter or to perform a contract between you and BBG, or if the decision is based on your explicit consent, BBG is taking suitable measures to safeguard your rights and freedoms and legitimate interests are in place.

[Right to withdraw a consent](#)

If the processing of the personal data is based on a consent, you shall have the right to withdraw your consent for the processing of personal data at any time. In exercising your right to withdraw a consent, the above contact details can be approached.

[Lodge a complaint with a supervisory authority](#)

The supervisory authority at the place of residence of the data subject is responsible for complaints in regards to data security.

5. Data Protection for Applications and Application Procedures

We are glad to see your interest in our company and that you apply for a position in our company. Hereinafter we want to inform you about the processing of personal data in respect of your application.

Which data is used for which purpose?

We process the data provided in your application in order to verify your qualification for the position you applied for (or other positions, if applicable) and to carry out the application procedure.

Legal basis

Legal basis for the processing of your personal data is primarily § 25 of the Bundesdatenschutzgesetz (BDSG) as of 25.05.2018 where the processing of data is legit as long as those are related to a decision about an employment relationship.

If data is still required after the application process, for prosecution if applicable, further processing may take place based on GDPR 6 (1) f. Our legitimate interest is enforcement of or protection against claims or charges.

Storage duration of personal data

Personal data of applicants is stored for 6 months in case of a rejection. If you have given your consent, we will transfer the data into our pool of applicants. From there the data will be deleted after 2 years.

In case you are employed, the personal data will be transferred from the application files to the personnel files.

Recipients of personal data

Your application data will be forwarded to our HR department and reviewed. Suitable applications will be provided to the relevant department heads. In general only personnel that is relevant for the application process gets access to your personal data.

Location of processing

Your data will solely be processed in data centers in Germany.



6. Rights as people concerned and right of appeal

Any inquiry that is made not in written form may require additional evidence in order to verify the rightfulness of the request.

Legal effect

Should parts or specific phrases of this document not or no longer, entirely or partly, be in line with the prevailing legal norms, the remaining parts of this document remain valid and legitimate.