

AtoB@C Shipping AB – Privacy policy

At AtoB@C Shipping AB, we protect your personal integrity and constantly strive to maintain a high level of data protection (e.g. we would never sell/trade your personal information to another company). This privacy policy explains how we handle your personal information.

It also describes your rights and how you may use your rights. It is important to us that you take part and understand our policy. We hope that you can feel safe with the way we handle your personal information. If you have any questions you are always welcome to contact us.

You can use our below register to navigate easily to the part of our policy which may be of interest to you.

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What is personal information and what is processing of personal information?

Personal information may be all kind of information which directly or indirectly can be referred to a physical and alive person. E.g. pictures and audio content which are stored in a computer counts as personal information even if there are no names attached to it. Encrypted data and electronic identities (e.g. IP-number) are also personal information if they can be linked to a physical person. The treatment of personal information is every action taken even if automatic or not. Examples of regular treatment of personal information is collecting, registration, organising, storing, transferring and deleting.

Who is responsible for the personal data that the Company are processing?

AtoB@C Shipping AB, org. nr 556299–5075, with the address Terminal Fyrkajen Hamntorget 2, SE 271 39 Ystad Sverige, is the controller of personal data and responsible for the processing of personal data at the company.

What kind of personal data do we process and for what reason?

When you communicate with us

You can communicate with us at AtoB@C Shipping AB via different channels, e.g. Skype, LinkedIn, GoToMeeting, telephone and e-mail. When you communicate with us we handle the personal data that you give us by free will, e.g.:

- Name and contact details
- Information concerning your queries or your business/errand

The reason why we handle your personal information is:

- Answer to your queries and handle your business/errand
- Deliver requested information
- To be able to contact you easily

Legal basis for the process: We support the processing of the above personal data for our and for your *legitimate interest*.

Time for Storage: We will save your personal data up to 12 months after closing a matter. The reason for this is that we need the possibility to trace our conversation and communication in order to reply to further questions concerning a certain matter.

Persons/Companies that we have an agreement with

When we have an agreement with a client or a supplier, we process the following data:

- Invoice instructions
- Personal information to persons in charge/of importance at a Company
- Contact details to persons in charge/of importance at a Company
- Important information connected to our agreement

- Information- and history of payment
- All relevant information to maintain our agreement

Personal data is processed in order to:

- Handle and deliver what has been agreed
- Administrate payments, e.g. issue an invoice
- Facilitate cooperation with our customers and suppliers
- Statistics and analysis with the purpose to improve our services, merchandise and offers
- Via e.g. e-mail contact our customers with offers
- Ensure that the safety of our services in order to discover or prevent different kinds of illegal utilisation.

Legal basis for the process: We handle your personal data with the support of *fulfilling an agreement* for the purposes where we are fulfilling our commitments towards our customers and suppliers. When we use data from contracts, businesses and voyages to present statistics and to evaluate with the purpose to improve and ensure the safety of our services, we support the processing with *legitimate interest*.

Time for Storage: We will save your personal data as long as there is an agreement. To ensure the traceability we will save data from our communication as long as this is relevant to our agreement.

When obliged due to the law

Furthermore, to what was explained above, we will process personal data when we are obliged according to the law, e.g. bookkeeping and when requested from authorities. An example is when we have to report a vessels crew list to the Maritime Single Window.

Legal basis for the process: When processing your personal data due to the obligation of the law, we support this with a *legal obligation*.

Who can we share your personal information with?

Personal Data Assistants. There are cases where it is necessary for us to share your personal data to other companies in order to offer our services or to fulfil an agreement. These companies are acting as personal information assistants to us. A Personal Data assistant is a company that processes the information on our behalf and according to our instructions. We have Personal Data Assistants who help us with:

- IT services (companies that handle necessary operations, technical support and maintenance of our IT solutions).
- Payment solutions (card-insolvent companies, banks and other payment service providers).
- Reporting to Authorities

When your personal information is shared with our Personal Data Assistants, it is only for purposes that are consistent with the purposes for which we have gathered the information (for example, in order to fulfil our commitments, an agreement or a legal obligation). We check all our Personal Data Assistants to ensure that they can provide sufficient safeguards regarding the security and confidentiality of personal data. We have written agreements with all Personal Data Assistants where they guarantee the security of the personal data being processed and also undertake to comply with our security requirements as well as restrictions and requirements regarding the international transfer of personal data.

Companies that are independent personally responsible. We also share personal data with certain companies that are independent personal data administrators. The fact that the company is an independent personally responsible means that we are not controlling how the information submitted to the company will be treated. Independent personal data officers with whom we share your personal information are:

- Government authorities (Customs, Taxation, Maritime Administration or other authorities) if we are required to do so by law.
- Businesses offering payment solutions (card-insolvent companies, banks and other payment service providers). When your personal information is shared with a company that is an independent personally responsible person, it applies to the company's privacy policy and personal data management.

For how long do we save your personal data?

We won't save your personal data for longer than what is necessary for each purpose. You can read more about where we have explained the processes of personal data being carried out at our company.

What is your rights when we are in possession of your personal data?

According to the data protection legislation you have certain rights. If you would like to use your rights you can contact us at any time.

- *Access to your personal data* – You have the right to be informed that we are processing your personal data. You can request for an extract over what data has been processed.
- *Request for correction* – You have the right to have incorrect data corrected
- *Request to be deleted* – Under certain circumstances you have the right to have your personal data deleted.
- *Oppose against the processing which we base on our legitimate interest as well as direct marketing treatment* - You are entitled to oppose the processing of your personal data or to limit your treatment.
- *Data Portability Right* - You are entitled to require personal data to be moved from us to another company, authority or organization. This right is limited to information provided by you.

To learn more about data protection legislation and your rights, read more here:

<http://eur-lex.europa.eu/legal-content/SV/TXT/?uri=CELEX:32016R0679>

If you consider that our processing of your personal data does not comply with data protection legislation, please contact us. See contact details in the below section. You are also entitled to complain to the Data Inspectorate.

How is your personal data protected?

We use an IT-system to protect the confidentiality, the integrity and the access of personal data. We have taken certain measures to protect your personal data against illegal or unauthorized processing. Only the persons that actually need to process personal data to fulfil a purpose will have access to them.

Data Protection Authority is the regulatory authority

The Data Protection Authority are responsible for the monitoring of the legislation, and the authority carrying out inspections at companies. If you find that a company doesn't follow the legislation, you can report a complaint to the Data Protection Authority.

Contact details and update of our integrity policy

Since we take data protection seriously, we always strive to improve ourselves in this area. Therefore, we might make changes in our integrity policy. The latest version is always available here at our web page. When the policy is updated, we will always explain the content of the updates and how they may affect you.

If you have any questions you can always reach us at atob@c-shipping.se.