

**Information for seafarers,  
regarding the implementation of obligations arising from Art. 13(1) and (2) of the  
General Data Protection Regulation of April 27, 2016. (GDPR)<sup>1</sup>.**

## **I. Joint Controllers**

The Controller of your personal data is Euroafrica Services Limited (Spółka z o. o.) Branch in Poland, ul. Energetyków 3/4, 70-952 Szczecin and other entities belonging to the Hass Holding Limited Capital Group, all with headquarters at Meliza Court 4 th floor 229, Arch. Makariou III Avenue 3105 Limassol, Cyprus (Joint Controllers).

The Joint Controllers jointly determine the methods and purposes of personal data processing and pursue economic interests. In order to ensure proper protection of your rights and freedoms in the field of personal data processing, the Joint Controllers, pursuant to Art. 26 of the GDPR, have concluded an agreement comprehensively and transparently regulating their mutual relations, mainly in the scope of fulfilling their obligations towards data subjects. For detailed information please contact us at the following e-mail address: [rodo@euroafrica.com.pl](mailto:rodo@euroafrica.com.pl).

## **II. Contact details**

The Joint Controllers have not appointed a data protection officer. However, in all matters relating to the processing of your personal data and the exercise of your rights, you can contact the Data Protection Representative appointed by the Joint Controllers, available at: ul. Energetyków 3/4, 70-952 Szczecin or e-mail: [rodo@euroafrica.com.pl](mailto:rodo@euroafrica.com.pl) or by phone: (+48 91) 814-34-00.

## **III. Purposes and legal basis for data processing**

1. Fulfilment of legal obligations incumbent on the Joint Controllers, including special rights in the field of labour law (Art. 6 section 1, letter c) and/or (Art. 9 section 2, letter b) of the GDPR in connection with the relevant health and safety regulations, the requirements of international conventions, in particular the International Convention for the Safety of Life at Sea, 1974 (SOLAS Convention) and the International Code for the Management of the Safe Operation of Ships and Pollution Prevention (ISM Code) and port regulations. The duties will include, among others: on:

- a) keeping logs and other ship documents,
- b) providing port authorities and other authorized bodies with information required by law,

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).

- c) conducting training and audits aimed at ensuring the safety of crews, cargo and proper operation of ships,
  - d) conducting post-accident proceedings and formal verification of the documentation produced,
  - e) ensuring supplies for the crews of operating ships, including appropriate clothing and footwear.
2. Implementation of the legally justified interests of the Joint Controllers (Art. 6 section 1, letter f of the GDPR), consisting in:
- a) performance of contracts with contractors, in particular identifying persons authorized to perform the activities specified therein and ensuring the security of information constituting a business secret,
  - b) ensuring the safety of seafarers and other persons staying on the ship and protecting property through the use of video monitoring,
  - c) determining and pursuing possible claims or defending against claims, e.g. related to the implementation of the insurance contract,
  - d) verification of professional preparation and qualifications.
3. Sometimes data may be processed pursuant to Art. 6 section 1, letter a of the GDPR, i.e. based on your voluntary consent, expressed each time for the purpose and to the extent indicated in its content.

#### **IV. Data recipients**

Your personal data may be made available to entities providing the Joint Controllers with services in the field of: administration and servicing of IT systems, communications, hosting, mail, banking, legal advice, insurance, document destruction, crew management, forwarding and maritime transport, and other entities, if it is necessary for the implementation of contracts. In addition, your data may be disclosed to public authorities only if an appropriate legal basis is indicated.

#### **V. Transferring data to a third country**

Due to the nature of the business activities of the Joint Controllers, your personal data may sometimes be transferred to a third country, i.e. outside the European Economic Area. In these cases, the transfer of data will take place on the basis of the principles set out in Chapter V of the GDPR, in particular on the basis of the decision of the European Commission confirming the adequate level of protection (Art. 45 of the GDPR), and in the absence of an appropriate decision, on the basis of standard data protection clauses (Art. 46 section 2, letter c of the GDPR), or based on one of the exceptions listed in Art. 49 section 1 of the GDPR, while maintaining the specific requirements indicated therein.

You have the right to obtain a copy of the personal data transferred. For this purpose, you can contact the designated Data Protection Representative or directly the relevant Joint Controller

## VI. Data storage period.

1. Data processed for the purposes indicated in point. III.1. will be stored for the periods indicated in the relevant special provisions.
2. Data processed for the purpose indicated in point. III.2. will be stored until the purpose is achieved or a justified objection is raised, but no longer than until the claims expire, and data obtained as a result of monitoring for up to 3 months from the time of their registration or until the final conclusion of the proceedings in which they constituted evidence.
3. Data processed for the purpose specified in point. III.3. will be stored until the purpose is achieved or consent is withdrawn.

## VII. Information about your rights

You have the following rights:

- ✓ access to the content of your data, including obtaining a copy thereof,
- ✓ rectification and supplementation of data,
- ✓ deletion of data,
- ✓ limiting the processing of your data,
- ✓ data transfer in cases where processing is carried out in an automated manner,
- ✓ raise an objection at any time due to your particular situation related to the processing of personal data pursuant to Article 6 section 1 letter f of GDPR,
- ✓ submit a complaint to the President of the Office for Personal Data Protection or a supervisory authority in another country, according to the jurisdiction specified in Article 4 point 22 of the GDPR,
- ✓ withdraw consent to their processing at any time without affecting the lawfulness of processing based on consent before its withdrawal,
- ✓ contact with the Data Protection Representative in all matters related to the processing of personal data and the implementation of the above rights.
- ✓ regardless of the arrangements indicated in the agreement between the Joint Controllers, you can exercise your rights towards each of them.

When exercising your rights, the Joint Controllers will take into account the limitations resulting from the GDPR and other legal provisions.

## VIII. Information regarding the need to provide data and possible consequences of failure to provide it

Providing personal data for the purposes specified in point III.1 and to the extent resulting from legal provisions is mandatory. In the remaining scope, providing data is voluntary. Refusal to provide data may make it difficult or impossible to achieve the goal.

## **IX. Information about automated decision-making**

The Joint Controllers do not process personal data in an automated manner, including in the form of profiling, i.e. they do not automatically assess some of your personal factors.