

DATA PROTECTION AND PRIVACY POLICY

GAUGE VESSEL LIMITED (“GVL”) RESPECTS YOUR PRIVACY AND THE PERSONAL INFORMATION WE ARE PROVIDED IN THE COURSE OF OPERATING OUR BUSINESS. YOUR PRIVACY IS IMPORTANT TO US.

THIS PRIVACY POLICY DESCRIBES THE WAYS YOUR PERSONAL DATA IS COLLECTED AND USED BY GVL.

WE RECOGNIZE THAT INFORMATION PRIVACY IS AN ONGOING RESPONSIBILITY, AND SO WE WILL FROM TIME TO TIME UPDATE THIS PRIVACY POLICY AS WE UNDERTAKE NEW PERSONAL DATA PRACTICES OR ADOPT NEW PRIVACY POLICIES. PLEASE READ THIS PRIVACY POLICY CAREFULLY.

GVL IS A COMPANY ORGANIZED AND EXISTING UNDER THE LAWS OF THE FEDERAL REPUBLIC OF NIGERIA UNDER REGISTRATION NUMBER 8322134. OUR REGISTERED OFFICE IS AT 50 QUEEN STREET, ALAGOMEJI, YABA.

YOUR PERSONAL DATA MAY BE SHARED WITH ASSOCIATED ENTITIES AS NECESSARY AND APPROPRIATE, UNDER THE CONDITION THAT APPROPRIATE MEASURES ARE PUT IN PLACE. WE COLLECT AND USE PERSONAL DATA IN ORDER TO CARRY OUT OUR MAIN BUSINESS ACTIVITIES (VESSEL LEASING, PURCHASE AND IOT SOLUTIONS) AS WELL AS OTHER SUPPORTING ACTIVITIES.

OUR PURPOSES AND LAWFUL GROUNDS FOR PROCESSING YOUR PERSONAL DATA VARY, DEPENDING ON OUR RELATIONSHIP WITH YOU AND ON THE ACTIVITY IN QUESTION. THE INFORMATION WE COLLECT AND USE IS LIMITED TO WHAT IS NECESSARY IN RELATION TO THE PURPOSES FOR WHICH YOUR DATA ARE PROCESSED WITH MINIMUM INTRUSION.

IF YOU ARE OUR CLIENT OR VESSEL OWNER, WE USUALLY PROCESS THE FOLLOWING KINDS OF PERSONAL INFORMATION IF YOU PROVIDE IT TO US, OR IF YOUR COMPANY PROVIDES IT TO US:

- **INFORMATION ABOUT YOU, INCLUDING YOUR NAME, JOB TITLE, ADDRESS, EMAIL AND OTHER CONTACT DETAILS.**
- **INFORMATION ABOUT THE COMPANY YOU ARE ASSOCIATED WITH.**
- **INFORMATION YOU PROVIDE TO US DURING COMMUNICATIONS YOU HAVE WITH US AND WITH OUR STAFF, FOR EXAMPLE COMMENTS OR QUERIES ABOUT A PARTICULAR SERVICE OR SUPPLY.**

MORE DETAILED INFORMATION ABOUT WHAT WE COLLECT AND HOW WE USE IT

CLIENTS AND OTHER CONTRACTING PARTIES: WE PROCESS PERSONAL DATA OF INDIVIDUALS WHO WORK FOR CLIENTS, AGENTS, LESSORS, VESSELS OWNERS AND CONTRACTING ENTITIES TO WHICH WE RENDER SERVICES OR DELIVER GOODS (CURRENT AND PAST). WE MAY NOT BE ABLE TO PROVIDE YOU/YOUR ORGANISATION WITH SPECIFIC SERVICE OR PRODUCT IF WE DO NOT HAVE ENOUGH INFORMATION.

1. TYPES OF PERSONAL DATA WE PROCESS

THE TYPE OF PERSONAL DATA WE COLLECT AND PROCESS MAY INCLUDE SOME OR ALL OF THE BELOW LISTED DEPENDING ON OUR RELATIONSHIPS WITH YOU:

IDENTITY DATA: FIRST NAME, GIVEN NAME, LAST NAME, GENDER, PERSONAL NUMBER, PASSPORT/ID CARD NUMBER AND TITLE OF CONTRACT SIGNATORY, IN SOME CIRCUMSTANCES IDENTIFICATION DOCUMENTS AND OTHER IDENTITY INFORMATION.

CONTACT DETAILS: BUSINESS ADDRESS, TELEPHONE, FAX NUMBER, MOBILE PHONE NUMBER, EMAIL ADDRESSES AND OTHER CONTACT DETAILS AS APPROPRIATE, COMMUNICATION PREFERENCES.

EMPLOYMENT INFORMATION: ORGANISATION NAME, POSITION/TITLE, RANK (FOR CREW MEMBERS), PROFESSIONAL SPECIALISM, QUALIFICATION, EMPLOYMENT HISTORY.

SERVICE DATA: DETAILS ABOUT SERVICES AND PRODUCTS YOU OR YOUR ORGANISATION HAVE REQUESTED OR WHICH WE HAVE PROVIDED TO YOU OR TO YOUR ORGANISATION.

OTHER INFORMATION: INFORMATION WE RECEIVE DURING THE COURSE OF OUR PROVISION OF SERVICES, EXISTENCE OF OUR CONTRACTUAL RELATIONSHIPS WITH YOU OR YOUR ORGANISATION.

WE USUALLY DO NOT PROCESS 'SPECIAL CATEGORY' DATA (PERSONAL DATA REVEALING RACIAL OR ETHNIC ORIGIN, POLITICAL OPINIONS, RELIGIOUS OR PHILOSOPHICAL BELIEFS, OR TRADE UNION MEMBERSHIP, GENETIC DATA, BIOMETRIC DATA FOR THE PURPOSE OF UNIQUELY IDENTIFYING A NATURAL PERSON, DATA CONCERNING HEALTH OR DATA CONCERNING A NATURAL PERSON'S SEX LIFE OR SEXUAL ORIENTATION) RELATED TO CHARTERERS, CLIENTS AND OTHER CONTRACTING PARTIES OR THEIR EMPLOYEES.

2. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

THIS INFORMATION IS EITHER (A) PROVIDED BY YOU, (B) PROVIDED BY YOUR ORGANISATION, (C) OBTAINED FROM THIRD PARTIES (FOR INSTANCE AGENTS, MANAGERS, YOUR SERVICE PROVIDERS), (D) OBTAINED FROM PUBLIC SOURCES (PUBLIC REGISTERS, INFORMATION AVAILABLE FROM SEARCHING THE INTERNET OR ON BUSINESS NETWORKING SITES) OR (E) CREATED BY US IN THE COURSE OF YOUR/YOUR ORGANISATION RELATIONSHIPS WITH US.

3. PURPOSES AND LAWFUL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

WE NEED TO COLLECT AND HOLD INFORMATION ABOUT YOU FOR THE FOLLOWING PURPOSES:

- TO COMMUNICATE WITH YOU FOR THE PURPOSES OF DISCUSSING RENDERING OF SERVICES/SUPPLY OF GOODS (OR OTHERS) TO YOU/YOUR ORGANISATION.
- TO CONFIRM YOUR IDENTITY FOR PROVIDING SOME SERVICES.
- FOR ASSESSING AN APPLICATION FOR A PRODUCT OR SERVICE, INCLUDING CONSIDERING WHETHER OR NOT TO OFFER YOU THE PRODUCT OR SERVICE, THE PRICE, THE RISK OF DOING SO, AVAILABILITY OF PAYMENT METHOD AND THE TERMS.
- TO ENTER INTO CONTRACT WITH YOU/YOUR ORGANISATION, TO PROVIDE SERVICES/GOODS TO YOU OR YOUR ORGANISATION, TO MANAGE THE SERVICE/PRODUCT YOU/YOUR ORGANISATION HAS WITH US.
- TO RESPOND TO YOUR INQUIRIES, REQUESTS, COMPLAINTS, CLAIMS AND OTHERS.
- TO ANALYZE OUR BUSINESS TRENDS AND PROFILES AND TO RECEIVE FEEDBACK FROM OUR CLIENTS.
- TO PROCESS FINANCIAL TRANSACTIONS (TO RECEIVE PAYMENTS AND CHECK IF PAYMENTS FROM YOU OR YOUR ORGANISATION ARE MADE).
- TO ENABLE OUR GROUP MEMBERS TO CARRY OUT ANY OF THE PURPOSES SET OUT ABOVE, TO ENABLE THIRD PARTIES TO CARRY OUT ANY OF THE PURPOSES SET OUT ABOVE ON OUR BEHALF OR TO ENABLE PROVISION OF SERVICES OF THIRD PARTIES APPOINTED BY YOU/YOUR ORGANISATION;
- TO UPDATE OUR RECORDS AND FOR AUDIT PURPOSES.

- TO COMPLY WITH LEGAL AND REGULATORY OBLIGATIONS, REQUIREMENTS AND GUIDANCE.
- TO COMPLY WITH LEGAL OBLIGATIONS AND OBLIGATIONS TOWARD THIRD PARTIES ON MONEY LAUNDERING, TERRORIST FINANCING, ANTI-BRIBERY AND CORRUPTION, TO CHECK IF YOU/YOUR ORGANISATION/SHAREHOLDERS/ULTIMATE BENEFICIAL OWNERS, DIRECTORS OR OTHER PERSONS RELATED TO YOUR ORGANISATION ARE INCLUDED IN THE LIST OF PERSONS, GROUPS AND ENTITIES SUBJECT TO FINANCIAL SANCTIONS IMPOSED BY NIGERIA/EU/ USA, OTHER COUNTRIES OR ORGANISATIONS.
- TO MAKE SUGGESTIONS AND RECOMMENDATIONS TO YOU/YOUR ORGANISATION ABOUT THE SERVICES/GOODS THAT WE OFFER AND TO SEND YOU MARKET AND INDUSTRY SPECIFIC INFORMATION AND REPORTS.
- TO TAKE LEGAL STEPS AGAINST YOU OR YOUR ORGANISATION OR PROTECT OURSELVES/ VESSELS OWNERS AGAINST CLAIMS RAISED BY YOU/YOUR ORGANISATION.

WE RELY ON THE FOLLOWING LEGAL BASES TO USE YOUR PERSONAL DATA:

- WHERE IT IS NECESSARY FOR THE PERFORMANCE OF A CONTRACT TO WHICH YOU ARE PARTY OR IN ORDER TO TAKE STEPS AT YOUR REQUEST PRIOR TO ENTERING INTO A CONTRACT.
- WHERE IT IS IN OUR LEGITIMATE INTERESTS TO DO SO, SUCH AS: TO CONDUCT OUR CORE BUSINESS ACTIVITY (CARRIAGE OF GOODS BY SEA), SUPPORTING ACTIVITIES, TO PROVIDE AGENCY SERVICES OR TO COMPLY WITH OUR CONTRACTUAL OBLIGATIONS AS INTERMEDIARY; TO PERFORM AND/OR TEST THE PERFORMANCE OF, OUR PRODUCTS, SERVICES AND INTERNAL PROCESSES; FOR MANAGEMENT AND AUDIT OF OUR BUSINESS OPERATIONS INCLUDING ACCOUNTING; FOR ESTABLISHMENT, EXERCISE OR DEFENCE OF LEGAL CLAIMS AND OTHER CLAIMS; TO EXERCISE OUR RIGHTS UNDER A CONTRACT CONCLUDED WITH YOU/YOUR ORGANISATION; WHERE WE NEED TO SHARE YOUR PERSONAL INFORMATION WITH PEOPLE OR ORGANISATIONS IN ORDER TO RUN OUR BUSINESS OR COMPLY WITH ANY LEGAL AND/OR REGULATORY OBLIGATIONS; TO IMPROVE THE OPERATION OF OUR BUSINESS AND THAT OF OUR BUSINESS PARTNERS; TO DEVELOP NEW PRODUCTS AND SERVICES AND TO IMPROVE EXISTING PRODUCTS AND SERVICES.

- WHERE THE PROCESSING IS NECESSARY FOR THE PURPOSES OF YOUR/YOUR ORGANISATION/THIRD PARTY'S LEGITIMATE INTERESTS: TO CONDUCT A BUSINESS (FOR INSTANCE WHEN YOU/YOUR ORGANISATION HAVE APPOINTED THIRD PARTY TO DO SOMETHING ON YOUR/ITS BEHALF OR WE PROCESS YOUR DATA FOR THE PURPOSES OF ENABLING VESSELS OWNER OR A GROUP MEMBER TO CONDUCT THEIR BUSINESS).
- WHERE THE PROCESSING IS NECESSARY FOR COMPLYING WITH OUR LEGAL OBLIGATIONS.
- WE MAY PROCESS PERSONAL DATA ALSO WITH DATA SUBJECT CONSENT OR EXPLICIT CONSENT.

WHERE NECESSARY OR REQUIRED WE SHARE INFORMATION WITH:

- YOUR ORGANISATION;
- OWNERS OF VESSELS SERVED/SUPPLIED BY US;
- PROFESSIONAL ADVISORS AND CONSULTANTS;
- AUDITORS;
- DEBT COLLECTORS;
- SERVICE PROVIDERS USED BY US OR VESSELS OWNERS OR USED BY YOU/YOUR ORGANISATION;
- LOCAL AND CENTRAL GOVERNMENTAL AUTHORITIES (INCLUDING PORT AUTHORITIES, CUSTOMS AND MARITIME ADMINISTRATIONS, BORDER AUTHORITIES);
- REGULATORY AUTHORITIES;
- COURTS, TRIBUNALS AND ARBITRATORS;
- LEGAL REPRESENTATIVES, DEFENCE SOLICITORS;
- SURVEY ORGANISATIONS;
- INSURERS.

WE USUALLY DO NOT USE YOUR PERSONAL DATA (IDENTITY AND CONTACT AND SERVICE DATA) FOR DIRECT MARKETING BUT IF WE SEND YOU MARKETING MESSAGE (FOR INSTANCE INVITATIONS TO MEETINGS OR MARKETING EVENTS) YOU MAY AT ANY TIME REQUEST US TO STOP DOING THAT BY CONTACTING US AT: INFO@GAUGEVESSELS.COM WITHOUT YOU/YOUR ORGANISATION SUFFERING ANY NEGATIVE CONSEQUENCES.

YOU MAY CONTACT US AT EMAIL: INFO@GAUGEVESSELS.COM IN ORDER TO RECEIVE FULL INFORMATION ABOUT WHAT PERSONAL DATA, RELATED TO YOU WE PROCESS.

WE MAY SHARE YOUR PERSONAL DATA WITH COMPANIES WITHIN GAUGE SOLUTIONS GROUP AND WITH COMPANIES CONTROLLING GVL AND WITH SERVICE PROVIDERS. WE ALSO SHARE DATA WITH BUSINESS PARTNERS (FOR EXAMPLE, FINANCIAL SERVICES INSTITUTIONS, INSURERS), ACCOUNT BENEFICIARIES, NOTARIES, OR OTHERS WHO ARE A PART OF PROVIDING YOU WITH PRODUCTS AND SERVICES/RECEIVING PRODUCTS AND SERVICES FROM YOU OR OPERATING OUR BUSINESS. WE DISCLOSE DATA TO GOVERNMENTAL AND REGULATORY BODIES SUCH AS NIGERIA DATA PROTECTION COMMISSION, MARITIME ADMINISTRATIONS, PORT AUTHORITIES, WHEN REQUIRED BY LAW APPLICABLE TO US OR TO RESPOND OR ESTABLISH A CLAIM.

WE SHARE PERSONAL INFORMATION WITH OTHER ORGANIZATIONS AND BUSINESSES WHO PROVIDE SERVICES TO US SUCH AS DEBT COLLECTORS, BACKUP AND SERVER HOSTING PROVIDERS, IT SOFTWARE AND MAINTENANCE PROVIDERS, DOCUMENT STORAGE PROVIDERS AND SUPPLIERS OF OTHER BACK-OFFICE FUNCTIONS. YOUR PERSONAL DATA MAY BE DISCLOSED ALSO WITH YOUR CONSENT, WHEN ALLOWED BY LAW OR FOR PROTECTING OR IN ORDER TO PROTECT LIVES, VITAL INTERESTS, RIGHTS OR PROPERTY OF GVL OR THIRD PARTIES.

THE PERSONAL DATA RELATED TO YOU MAY BE TRANSFERRED TO, AND STORED AT, COUNTRIES AND TERRITORIES OUTSIDE NIGERIA. THEY MAY BE PROCESSED BY ENTITIES BELONGING TO GVL OR ITS PARENT COMPANY GROUPS, OR BY OUR SERVICE PROVIDERS LOCATED OUTSIDE OF NIGERIA.

IF YOUR PERSONAL DATA ARE TO BE TRANSFERRED OUTSIDE NIGERIA, WE WILL ENDEAVOR TO APPLY SUITABLE SAFEGUARDS TO PROTECT THE PRIVACY AND SECURITY OF YOUR PERSONAL DATA AND TO USE IT ONLY CONSISTENT WITH YOUR RELATIONSHIP WITH GVL.

WE WILL STORE YOUR PERSONAL DATA IN COMPLIANCE WITH THE REQUIREMENTS OF THE NDPC. WE WILL ONLY KEEP YOUR PERSONAL DATA FOR AS LONG AS NECESSARY TO FULFIL THE PURPOSES FOR WHICH WE COLLECTED IT, TO SATISFY ANY LEGAL, ACCOUNTING OR REPORTING REQUIREMENTS OR TO PROTECT OUR LEGITIMATE INTERESTS. IF THERE IS NO LEGAL REQUIREMENT FOR THE PERIOD OF RETENTION OF THE PERSONAL DATA WE DETERMINE THE APPROPRIATE RETENTION PERIOD FOR PERSONAL DATA BY CONSIDERING THE AMOUNT, NATURE, AND SENSITIVITY OF THE PERSONAL DATA, THE POTENTIAL RISK OF HARM FROM UNAUTHORIZED USE OR DISCLOSURE OF YOUR PERSONAL DATA, THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA AND WHETHER WE CAN ACHIEVE THOSE PURPOSES THROUGH OTHER MEANS, AND THE APPLICABLE LIMITATION PERIODS FOR CLAIMS WHICH MIGHT BE BROUGHT AGAINST US OR BY US AGAINST YOU.

IN SOME CIRCUMSTANCES WE MAY ANONYMIZE YOUR PERSONAL INFORMATION SO THAT IT CAN NO LONGER BE ASSOCIATED WITH YOU.

WE AIM TO ENSURE THAT YOUR PERSONAL DATA ARE SECURE. IN ORDER TO PREVENT UNAUTHORIZED ACCESS, DESTRUCTION OR DISCLOSURE OF YOUR PERSONAL DATA WE HAVE PUT IN PLACE APPROPRIATE PHYSICAL, TECHNICAL AND ORGANISATIONAL MEASURES. OUR SERVICE PROVIDERS ARE REQUIRED TO DO THE SAME.

IN ASSESSING THE APPROPRIATE LEVEL OF SECURITY, WE TAKE INTO ACCOUNT IN PARTICULAR THE RISKS THAT ARE PRESENTED BY PROCESSING, IN PARTICULAR FROM ACCIDENTAL OR UNLAWFUL DESTRUCTION, LOSS, ALTERATION, UNAUTHORIZED DISCLOSURE OF, OR ACCESS TO PERSONAL DATA COLLECTED, STORED OR OTHERWISE PROCESSED. WE UPDATE AND TEST OUR SECURITY TECHNOLOGY ON AN ONGOING BASIS. WE RESTRICT ACCESS TO YOUR PERSONAL DATA TO THOSE EMPLOYEES WHO NEED TO KNOW THAT INFORMATION TO PROVIDE BENEFITS OR SERVICES TO YOU, WE CONTROL THE ACCESS TO SYSTEMS AND NETWORKS WHICH ALLOWS US TO STOP PEOPLE WHO ARE NOT ALLOWED TO VIEW YOUR PERSONAL INFORMATION FROM GETTING ACCESS TO IT. WE TRAIN OUR EMPLOYEES ABOUT THE IMPORTANCE OF CONFIDENTIALITY AND MAINTAINING THE PRIVACY AND SECURITY OF YOUR INFORMATION AND HAVE PUT IN PLACE APPROPRIATE POLICIES AND PROCEDURES. WE COMMIT TO TAKING APPROPRIATE DISCIPLINARY MEASURES TO ENFORCE OUR EMPLOYEES' PRIVACY RESPONSIBILITIES.

THE NDPC PROVIDES CERTAIN DATA PROTECTION RIGHTS FOR YOU INCLUDING TO REQUEST ACCESS, RECTIFICATION, RESTRICTION, DELETION OR TRANSFERRING ("PORTING") OF YOUR DATA, AND TO OBJECT TO OUR USE OF YOUR DATA, INCLUDING FOR DIRECT MARKETING. OUR RESPONSE TO YOUR REQUESTS MAY DEPEND ON WHICH LEGAL GROUNDS WE ARE USING TO PROCESS THE DATA IN QUESTION.

YOU HAVE THE RIGHT TO COMPLAIN ABOUT US TO NDPC BUT IF YOU ARE CONCERNED THAT OUR PROCESSING OF YOUR PERSONAL INFORMATION IS NOT COMPLIANT WITH THE NDPC, PLEASE CONTACT US FIRST.

ANY CHANGE IN THE CONTACT DETAILS SHALL BE PUBLISHED ON GVL WEBSITE: [HTTP://WWW.GAUGEVESSELS.COM](http://www.gaugevessels.com).

WE MAY REQUEST ADDITIONAL INFORMATION (INCLUDING COPIES OF DOCUMENTS) FROM YOU FOR THE PURPOSES OF VERIFYING YOUR IDENTITY.

WE WILL RESPOND TO YOUR REQUEST WITHOUT UNDUE DELAY (USUALLY WITHIN 24HRS) AND WILL GIVE YOU OUR REASONS WHERE WE DO NOT INTEND TO COMPLY WITH YOUR REQUESTS. IF WE NEED MORE TIME TO RESPOND (PARTICULARLY DUE TO THE COMPLEXITY OF YOUR REQUEST OR IF YOU HAVE MADE A NUMBER OF REQUESTS) WE WILL NOTIFY YOU.

THESE THIRD-PARTY SITES MAY PLACE COOKIES OR OTHER FILES ON YOUR COMPUTER, COLLECT DATA OR SOLICIT PERSONALLY IDENTIFIABLE INFORMATION FROM YOU. THIRD PARTY SITES ARE GOVERNED BY THEIR OWN PRIVACY POLICIES, WE DO NOT EXERCISE CONTROL OVER THEM THEREFORE WE

DO NOT ACCEPT ANY RESPONSIBILITY OR LIABILITY FOR THEIR POLICIES OR PROCESSING OF YOUR PERSONAL INFORMATION. WHEN ACCESSING THIRD PARTY SITES PLEASE MAKE SURE THAT YOU READ CAREFULLY THE APPLICABLE PRIVACY POLICIES OR STATEMENTS.

IF YOU WOULD LIKE MORE DETAILED INFORMATION ABOUT OUR PRIVACY AND DATA PROTECTION POLICY, PLEASE, CONTACT US AT EMAIL:
INFO@GAUGEVESSELS.COM

THIS PRIVACY POLICY IS SUBJECT TO CHANGE FROM TIME TO TIME. THE MOST CURRENT VERSION WILL ALWAYS BE AT [HTTPS://WWW.GAUGEVESSELS.COM](https://www.gaugevessels.com). WHERE APPROPRIATE AND FEASIBLE OR REQUIRED BY GDPR SUCH CHANGES WILL BE NOTIFIED TO YOU BY EMAIL.

WE MAY EMAIL PERIODIC REMINDERS OF OUR NOTICES AND MAY PERIODICALLY REQUEST BY EMAIL (IF AVAILABLE) UPDATES OF YOUR PERSONAL INFORMATION USED BY US.

PLEASE CHECK BACK FREQUENTLY TO SEE ANY UPDATES OR CHANGES TO OUR PRIVACY POLICY.