

# PRIVACY POLICY

# 1. Preface

WaterFront Maritime Services is committed to keeping the personal information of individuals acting as or affiliated with its historical, current, or prospective customers, investors, vendors, and other business partners (hereafter referred to as “Individuals”) confidential, accurate, secure, and private. For this Privacy Policy Statement, “WaterFront Maritime Services” or the “Company” means WaterFront Maritime Service DMCC and its subsidiaries, affiliates, directors, officers, or employees (as the context requires), and “personal information” means any information relating to an identified or identifiable Individual.

## 2. Information we collect

For WaterFront Maritime Services to undertake its business and comply with applicable statutory, regulatory, contractual, and quality management requirements, WaterFront Maritime Services may collect and hold the following personal information of Individuals:

- Professional contact details (e.g., name, email address, postal address, telephone/facsimile number(s));
- Identification documentation (e.g., photographic ID, date of birth, postal address);
- Financial details (e.g., bank details).
- Other information about Individuals (e.g., individual contractors or sole proprietorships, including name, address, type, reason for engagement, conflict of interest, country, special instructions, and agreements).

If Individuals contact WaterFront Maritime Services and choose to provide their professional contact details to WaterFront Maritime Services, it will collect and store personal information in a way that allows it to be related to the Individuals personally (e.g., name, email address, postal address, telephone/facsimile number(s)).

## 3. How and why we use information

The use of personal information depends on individual circumstances, including but not limited to:

- Communicating with you
- Relationship management
- Marketing our business
- Performing our services
- Reporting to stakeholders;
- Compliance purposes and legal rights;
- Operating WaterFront Maritime Services’ business.

Where applicable, we indicate whether and why you must provide us with your personal information and the consequences of failing to do so. WaterFront Maritime Services holds data in electronic computer systems and uses computer and communications equipment to access this personal information. Personal information is stored on WaterFront Maritime Services’ systems and equipment appropriate for use at the relevant time. We do not engage in what is known as “automated decision making” (i.e., making decisions with legal or similarly significant effects solely based on the automated processing of personal information).

We rely on a legal basis to process your personal information when this is required by applicable law, including:

- Consent. For example, you have consented to us sending you your personal information for electronic marketing communications.
- Contract. We need your personal information to perform or enter into an agreement with you.
- Legal obligation. For example, we have a legal obligation to use your Personal Data to comply with tax and accounting obligations.
- Legitimate interest. We or a third party have a legitimate interest in using your personal information, such as relationship management. We only rely on this legal basis when your rights and freedoms do not override our or a third party’s legitimate interest.



## 4. Who we share information with

In all circumstances, the sharing of personal information is done so where there is a legitimate reason in connection with the uses outlined in Section 3 (How and Why we use information).

WaterFront Maritime Services communicates with multiple parties in the ordinary course of its business, including but not limited to its subsidiaries, affiliates, directors, officers, employees, customers, investors, vendors, and other business partners. While doing so, WaterFront Maritime Services does not use personal information for any purpose other than the one it provided.

WaterFront Maritime Services may share personal information with certain third parties who perform tasks on our behalf; however, information is only shared to the extent necessary to achieve the purpose for which it was provided. The aforementioned third parties act on WaterFront Maritime Services' instructions and are contractually bound by data protection and confidentiality obligations.

WaterFront Maritime Services may also share personal information with third parties where there is a statutory, regulatory, contractual, or quality management obligation to do so, for example, to respond to requests from governmental authorities.

## 5. How we protect information

All personal information collected and recorded, on paper or electronically, has appropriate safeguards in place as required by statutory, regulatory, contractual, or quality management obligations. WaterFront Maritime Services' policies and procedures are intended to minimize the risk of loss or damage.

WaterFront Maritime Services has ensured vital personnel within the Company have been provided familiarisation and training in relation to protecting personal information and are subject to a duty of confidentiality in respect of personal information we obtain and process.

WaterFront Maritime Services can restore personal information stored electronically in situations where data has become corrupted or lost.

Where appropriate, the Company uses encryption, access restrictions, and/or security measures to protect personal information.

The Company's control of personal information is regularly reviewed to ensure adherence to best practices and to ensure the suitability of the controls over confidentiality, accuracy, security, and privacy of personal information.

No means of protecting personal information is guaranteed by WaterFront Maritime Services.

## 6. Where information is processed

WaterFront Maritime Services is a global business and may transfer personal information to countries other than the country in which the information was originally collected, including to Dubai where we are headquartered and where some of our vendors are located. We will only transfer personal information across borders in accordance with applicable law, for example by relying on contractual protections. For more information, please contact us using the contact details outlined in Section 9 (Contact information).

## 7. How long we keep information

We take measures to delete your personal information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it unless we are required by law to keep it for a more extended period. When determining the retention period, we take into account various criteria, such as the type of services involved, the nature and length of our relationship with you, mandatory retention periods, and the statute of limitations. In accordance with the Company's policies and procedures, personal information may be maintained for up to 7 years.



## 8. Your rights

Individuals may, in certain jurisdictions, have legal rights in relation to how WaterFront Maritime Services processes personal information, including but not limited to the following:

- Right to request rectification;
- Right to request erasure;
- Right to restrict processing;
- Right to data portability;
- Right to object;
- Right to withdraw consent. If you exercise your right to withdraw consent, we will apply your preferences in the future, and this will not affect the lawfulness of the processing before you withdraw your consent.
- Right to complain with the data protection authority in your country of residence, place of work, or where the alleged data protection violation occurred.

You may request to exercise these rights by contacting us using the contact details outlined in Section 9 (Contact information). Before meeting your request, please provide reasonable information to verify your identity. Please note that there are exceptions and limitations to each of these rights and that it depends on your location and applicable law whether you can exercise them.

## 9. Contact Information

Any inquiries in relation to this Privacy Policy or the personal information Ben Line Agencies has or may obtain / process in respect of Individuals should be directed to:

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Chief Executive Officer

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Jumeirah Lake Towers - Cluster T  
PO Box 336 990, Dubai, UAE  
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email: Ken.Scheepers@WaterFront-ms.com

WaterFront Maritime Services is the entity responsible for the data processing activities described in this Privacy Policy.

This policy was last updated  
September 2023. WaterFront Maritime  
Services reserves the right to make changes  
to this policy as required.

