

GENERAL DATA PROTECTION REGULATION

Policy Statement

This Policy Statement explains what information we collect, when we collect it and how it is used. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this Policy Statement is to make you aware of how your information will be handled. You should read this policy carefully and contact us with any concerns you have about how we handle your data.

1. WHO ARE WE?

Minitech Systems Limited, hereinafter referred to as "the Company" takes the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

The Company is the Data Controller but due to the nature of the data it holds and the type of processing the Company performs, the Company is not required to register with the Office of the Information Commissioner and we are not required to appoint a Data Protection Officer.

Any questions relating to this policy or our privacy practices should be addressed to the Company using the contact details in Schedule I.

2. WHAT INFORMATION DO WE COLLECT?

The Company deals only with other Business's and does not collect any "Sensitive Personal information" belonging to individuals. The information the Company does collect includes:

"Client Details" includes potential Clients, current Clients and past Clients. Information collected includes Organisation Name, Client Office Addresses, Telephone Numbers, business e-mail addresses (including the business email addresses of the Clients employees and where appropriate of the Clients Associates). These are collected when you contact the Company in writing, by telephone, e-mail, via the Company website or face to face with one of the Company's employees. From time to time we may also be given Private e-mail addresses of the Clients employees or Associates for the purposes of expediting contact out of normal business hours. Some or all of the above details for Potential Clients may be obtained for marketing purposes from a third party source such as the "World Shipping Encyclopaedia published by IHS Markit and used subject to the Terms of their GDPR Policy.

"Client Accounting Records", including products or services purchased, purchase order numbers, invoice amounts and payments received.

"Client Bank Details", including Clients Bank Name, Account Name, Sort Code, IBAN & SWIFT codes. Only collected in very rare cases where a Client which has a contract with the Company, requests funds to be refunded following the Client making an incorrect payment or the cancellation of a contract before its full term.

"Clients Fleet & Vessel Details", may include the number, types and size of vessel that a Client owns, manages or operates. These are collected when you contact us with an enquiry about the Company's products or services, when you

request a quotation by telephone, e-mail, by our website or face to face with one of the Company's employees, when you place an order for the Company's products or services or when the Company's employees attend the Clients offices and/or vessels to install the Company's products or perform services.

"Data" which is needed to setup the Master Databases used by the Company's Software systems. This includes but not limited to Clients Branding Information, Logo's, Specification Structure, Account Codes, Contractual Terms & Conditions, Ship Names and Technical Data that describe the vessels. This information is collected only when it is supplied to the Company by the Client or potential Client when an order is placed for one of the Company's Software systems, or when an existing Master Database is being added to, extended or updated.

"Backup Copies of Installed Systems" including Master Database for office and shipboard installations along with the programs and supporting files which were installed at the time a system was first supplied, last upgraded or extended.

3. HOW DO WE USE PERSONAL INFORMATION

The Information we collect is used for:

- (i) Administration and Account Setup in connection with supply of the Company's Software or providing services including, but not limited to Training and Support and the Invoicing associated with it.
- (ii) Providing prospective Clients with Quotations and guidance in connection with new purchases of the Company's products or services.
- (iii) Setting-up new systems that have been purchased by Clients
- (iv) Providing support to the Client's staff in the use of the Company's software and in resolving questions arising from the Data setup or operation of the system.
- (v) Providing support to the Client's staff in the installation of Upgrades which may from time to time be supplied by the Company.
- (vi) Providing support to the Client's staff in the use of "system backup" routines designed to preserve the integrity of the stored data and so minimise the effects of a system failure.
- (vii) Maintaining and testing the Applications Programs, including rectification of any programming errors that are reported by Clients to the Company.
- (viii) Providing Upgrades in respect of changes made in connection with (vii) above, also in respect of any enhancements or improvements to the Programs which the Company has been contracted to make by Client's.
- (ix) Promulgating amendments to the User Manuals which have been made in connection with (vii) or which have been made as part of any enhancements or improvements to the software which the Company has been contracted to make by Client's.

4. WHAT LEGAL BASIS DO WE HAVE FOR PROCESSING YOUR PERSONAL DATA?

- (i) The Company processes the data belonging to prospective Clients on the basis of legitimate interest in that the company is explicitly set up to provide software and services in order that the Company should profit from that trade.
- (ii) The Company processes the data belonging to current Clients in order that it is able to provide the Products and/or Services that are required by contract. This includes Sale Agreements whether in writing or not, Support Agreements whether in writing or not and any other agreement which the Client and the Company have entered into, whether in writing or not.
- (iii) The Company processes the data belonging to past Clients on the basis of legitimate interest so that the Company is in a position to reinstate software and/or reinstate support with minimum expense to the Client should the company be contracted to do so.

5. WHEN DO WE SHARE PERSONAL DATA?

All Data collected by the Company or maintained for the Client is kept private and confidential and is not disclosed under any circumstances to any third parties, unless specifically authorised to the contrary except that:

- (i) Extracts from Backup copies of installed systems may be used for testing and/or documenting program features which have been specifically requested by the Client, the Client's Employees or the Clients Associates providing that any data shared is anonymised sufficiently so that the Client cannot be identified.
- (ii) If the Client is unable to make payments required under any contract between the Client and the Company, whether in writing or not, the Clients information may be disclosed to any relevant party assisting in the recovery of this debt.

Unless required to do so by law, the Company will not otherwise share, sell or distribute any of the information provided to the Company without the Client's consent.

6. HOW DO WE SECURE PERSONAL DATA?

The Company has procedures in place to:

- (i) Prevent unauthorised access, use, destruction or disclosure
- (ii) Ensure business continuity and disaster recovery including off-site backups of all personal data which is held electronically as well as the Company's program source code and data
- (iii) Restrict access to personal information.
- (iv) Conduct privacy impact assessments in accordance with the law.
- (v) Train staff and contractors (if any) on data security.
- (vi) Manage third party risks, through use of insurance contracts and security reviews.

7. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- (i) The Company will retain data it has collected belonging to prospective Clients until such time as:
 - a) The prospective Client makes representation to the Company notifying us that they are no longer interested in the Company's products or services.
 - b) The prospective Client responds to an enquiry from the Company notifying us that they are no longer interested in the Company's products or services.
 - c) It becomes obvious to the Company that a prospective Client is no longer interested in the Company's products or services and can therefore no longer be legitimately considered a prospective Client.

When any of the above occurs, any Personal information, other than past e-mail correspondence will be deleted or destroyed. In addition, where the prospective Clients information was obtained from a third party source such as the "World Shipping Encyclopaedia" published by IHS Markit, the prospective Clients name will be added to the Company's own "Non-Contact" list.

- (i) The Company will retain data it has collected belonging to current Clients for as long as necessary to enable it to provide the Products and/or Services that are required by contract. This includes Sale Agreements whether in writing or not, Support Agreements whether in writing or not and any other agreement which the Client and the Company have entered into, whether in writing or not.
- (ii) The Company will retain data it has collected belonging to past Clients for as long as is reasonable for the company to be in a position to reinstate software and/or reinstate support with minimum expense to the Client should the Company be required to do so.
- (iii) The Company will retain "Client Accounting Records" for the periods stipulated by the UK Companies Act and/or guidelines set by the UK's HMRC.

8. YOUR RIGHTS IN RELATION TO PERSONAL DATA

You have the right at any time to:

- (i) Ask for a copy of the information held about you in the Company's records
- (ii) Require the Company to correct any inaccuracies in your information
- (iii) Make a request for the Company to delete what personal data of yours the Company holds.
- (iv) Request that the Company cease and desist from sending marketing communications.

To exercise any of your rights above please, contact the Company using the contact details in Schedule I.

Should you wish to complain about the use of your information, we would ask that in the first instance you contact the Company to allow us to resolve the matter.

If after contacting the Company the matter has not been resolved to your satisfaction, you also have the right to complain to the Information Commissioner's Office in relation to the Company's use of your information.

The Information Commissioner's contact details are noted in Schedule II.

9. JURISDICTION

Any dispute arising from this Policy statement shall be governed by English Law and subject to the jurisdiction of the English Courts, London Arbitration to apply.

SCHEDULE I

Company Details

The Company: Minitech Systems Limited

Postal Address: Bridle Way
Off St. Vincents Close
Girton, Cambridge
CB3 0PB, U.K.

Telephone: +44 (0) 1223 277049

e-mail: privacy@minitech-systems.com

SCHEDULE II

The Information Commissioner's contact details in the UK are:

England:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

Scotland:

Information Commissioner's Office - Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.uk

Wales:

Information Commissioner's Office
2nd floor, Churchill House
Churchill way, Cardiff, CF10 2HH
Telephone: 029 2067 8400
Email: wales@ico.org.uk

Northern Ireland:

Information Commissioner's Office
3rd Floor, 14 Cromac Place
Belfast, BT7 2JB
Telephone: 028 9027 8757
Email: ni@ico.org.uk