

## **MAHE SHIPPING COMPANY PRIVACY POLICY**

**Last update: 8 July 2019**

We at Mahe Shipping Co Ltd (hereafter, "MSC"), respect your concerns about privacy. This Privacy Policy (hereafter "the policy") describes the types of personal information we collect about clients and other visitors to our website, [www.maheship.com](http://www.maheship.com) (hereafter "the website"), how we may use the information and with whom we may share it. The notice also describes the measures we take to safeguard personal information. In addition, we tell you how you can ask us to (i) access or change the personal information we maintain about you, (ii) withdraw consent you previously provided to us, (iii) refrain from sending you certain communications, and (iv) answer questions you may have about our privacy practices.

The purpose of the policy is to explain to visitors to our website how we control, process, handle and protect your personal information while you browse or use this website. If you do not agree to the following policy you may wish to cease visiting this website, and or refrain from submitting your personal data to us.

Our policy embodies the following key principles: legality, fairness & transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity & confidence and accountability.

### **Your Personal Data and Your Rights**

Under the General Data Protection Regulation (GDPR) we control and/or process any personal information received via the website electronically. We will continue to process your information under this basis unless you withdraw consent. We do not share your information with third parties. If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used, if necessary. Under GDPR your rights are:

- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

### **Data Security and Protection**

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

### **Email Marketing Messages**

Any email marketing messages we send are done so by MSC and not any third party. Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; time, date, IP address, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that a campaign.

Any email marketing messages we send are in accordance with GDPR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time.

### **Information MSC Obtains**

We process names, email addresses and telephone numbers of persons to whom we are asked to send information on the assumption that the person who provided the information obtained it in accordance with applicable law. If this assumption is incorrect, please do not ask us to send information to third parties on your behalf.

We may need certain of your information in order to provide services, such as precise locations including street addresses to deliver consignments. In addition, we may be required by law to collect certain information, such as whether a consignment contains hazardous materials. Where such information is so required, we may be unable to provide you with our services unless you provide us with this information.

In accordance with applicable law, we may obtain your consent separately before collecting information by automated means using cookies or similar devices. This involves placing a small text file on your device to track your use of the website and log pages viewed. We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

We may obtain consumer personal information (such as name, contact details and payment information) in connection with various activities including the website and applications, shipping activities and including delivery and collection of shipments and requests to MSC to track shipments or answer questions.

The types of personal information we may obtain include:

- Individual and business contact information (such as name, company name, physical address, email address and telephone or fax number)
- Shipping information, including (i) shipping-related contact details notably the sender's, and consignee's name, physical address, email address and telephone number, (ii) signature for proof of delivery, (iii) MSC account number, and (iv) information given to us by the client regarding shipments, but only to the extent an identifiable person can be linked to such content.

- Information that enables us to verify an individual's identity
- Names, email addresses and telephone numbers of others to whom we are asked to send information
- Content posted on our official website via contact forms
- The geographic location of website users
- Payment information and financial information (such as bank account numbers)
- Other personal information that may be provided to us to obtain a MSC service.

We also receive consumer personal information from our customers in order to perform services. We may receive personal information from third parties, including public databases, social media platforms, or third party partners such as analytics or marketing providers.

When we collect or deliver shipments or provide other services, we may obtain physical location data, including physical address. In addition, when you visit the website or interact with MSC-related tools, widgets or plug-ins, we may collect certain information by automated means, such as cookies and web beacons. The information we collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken, and dates and times of activity. A "cookie" is a text file that websites send to a visitor's computer or other internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "web beacon" also known as an Internet tag, pixel tag or clear GIF, links web pages or apps to web servers and may be used to transmit information back to a web server. Through these automated collection methods, we obtain and store "clickstream" data to tell us usage patterns. We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you to let us know, for example, whether you have opened an email we sent to you. We also may use third-party analytics tools that collect information about visitor traffic on our websites or apps. We may collect personal information about our visitors' online activities, over time and across third-party websites, when using our websites and apps.

### **How MSC Uses Information Obtained**

We may use the information we obtain to:

- Pick up, deliver and track shipments
- Provide products and services you request (such as logistics, supply chain management, customs clearance and brokerage services)
- Process and collect payments
- Provide customer support and respond to and communicate with you about your requests, questions and comments
- Send you tracking updates (from MSC and/or our other business partners) and help you select convenient delivery options
- Establish and manage your MSC account
- Offer you products and services we believe may interest you
- Operate, evaluate and improve our business

- Perform data analyses (including market and consumer search and analytics, trend analysis and profiling)
- Protect against, identify and prevent fraud and other prohibited or illegal activity, claims and other liabilities
- Comply with applicable legal requirements and our policies
- Establish, exercise and defend legal claims
- Monitor and report compliance issues

In addition, we use information collected online through cookies, web beacons and other automated means for purposes such as (i) customising our users' visits to our websites and apps, (ii) delivering content tailored to our users' interests and (iii) managing our business. We may supplement data we collect through automated means with information about your location to provide you with content that may be of interest to you. We also use this information to help diagnose technical and service problems, administer our websites and apps, identify users of our websites and apps, and gather demographic information about our users. We use clickstream data to determine usage patterns and how we may tailor our websites and apps to better meet the needs of our users. Our website is not designed to respond to "do not track" requests from browsers.

The legal bases for which we collect, use, transfer or disclose your personal information include (i) the performance of the contract we have with you, (ii) marketing, improvement of our services and other legitimate business interests, (iii) compliance with a legal obligation, and (iv) the protection of yours and others vital interests. The corresponding purposes for which we process your personal information are systematically included in the "How We Use the Information We Obtain" section in the privacy policy above.

We may process your personal information based on your consent, where required by law. If we request your consent, we will inform you of the intended purposes for which your information will be processed. We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

### **Data Retention by MSC**

Your personal information will not be stored for longer than necessary for the purposes for which they were collected or as required under applicable retention policies and/or in accordance with applicable law. Our retention policies reflect local statute of limitation periods and national statutory obligations of MSC.

### **International Data Transfers by MSC**

MSC may transfer the personal information we collect about you to countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

When MSC transfers your personal information to other countries, we will protect that information as described in this policy and in accordance with applicable law.

If you are a resident of the European Economic Area, we may transfer your personal information to countries that have not been found by the European Commission to provide adequate protection, including the United States. For any such transfers, MSC takes necessary contractual measures to ensure that your personal information receives an adequate level of protection (including, for example, standard contractual clauses).

### **Information MSC Shares**

MSC does not sell or otherwise share personal information about you, except as described in this policy. To perform clearing and forwarding, shipping agency and courier services, MSC shares shipping information with third parties such as senders, consignees, third party payers and recipients. MSC also shares personal information with third parties who perform services on our behalf based on our instructions. These third parties are not authorised by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

MSC may also share the personal information obtained with our affiliates in the Corvina Group of companies (Corvina Investment Company Limited and its subsidiary and associated companies). These companies may use the information for the purposes described in this policy. MSC may share physical location data with our Corvina Group partners and other third parties to, for example, enhance location-based services and develop accurate and up-to-date maps. In addition, except as described below, unless you object, we may share other personal information with third parties who are not MSC partners for those parties' own purposes, such as to offer products or services that may interest you.

In the course of providing services, MSC may obtain, use and disclose personal information about our customers' customers. In these circumstances, MSC processes the information based on the agreement with our customer.

MSC also may disclose information about you (i) if MSC are required to do so by law, regulation or legal process (such as a court order or subpoena), (ii) in response to requests by government agencies, such as law enforcement authorities, or (iii) when MSC believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. MSC reserves the right to transfer any information about you in the event we sell or transfer all or a portion of our business or assets.

### **Your Options**

MSC offers you certain choices about how to communicate with you and what information is collected from you. You also may ask MSC not to send you other marketing communications by using the "Contact Us" page of this website and MSC will honour your request. In addition, you may object at any time on legitimate grounds and free of charge to the processing of your personal information and MSC will apply your preferences. You may ask us to refrain from sharing your personal information with certain of our affiliates and other third parties for their marketing purposes. Please tell us your preference by contacting us.

## **Access and Correction**

You may obtain a copy of certain personal information MSC maintains about you or update or correct inaccuracies in that information by contacting us on this website. To help protect your privacy and maintain security, MSC will take steps to verify your identity and/or may ask you to provide other details before granting you access to the information. In addition, if you believe that personal information MSC maintains about you is inaccurate, subject to applicable law, you may have the right to request that MSC correct or amends the information by contacting us as indicated below.

## **Non-MSD Places and Services**

For your convenience and information our website contains links to non-MSD websites, some of which may be operated by companies not affiliated with MSC. These companies may have their own privacy policies or notices, which we strongly suggest you review. MSC are not responsible for the privacy practices of any organisation other than MSC.

## **How MSC Protects Personal Information**

MSC maintains administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. Although MSC takes steps to limit access to our facilities and vehicles to authorised individuals, information that is located on the outside of packages, consignments or correspondence may be visible to others.

## **Updates to Our Privacy Policy**

This policy may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will indicate at the top of the policy when it was most recently updated.

## **How to Contact MSC**

If you have any questions or comments about this policy, or if you would like us to update information we have about you or your preferences, please contact us by using the Contact Us page of this website.

You also may write to us at:

Mahe Shipping Company Ltd, PO Box 336, Seychelles, or:

Mahe Shipping Company Ltd, Maritime House, Victoria, Mahe, Seychelles

Attention: Managing Director

## **Your Personal Information Rights**

In addition to the right to access and correction, as specified above (under “Access and Correction” in the main body of this policy), you have (i) the right to request the transmission of the personal information you have provided to us to you or another company, (ii) the right to object to any uses or disclosures of your personal information, (iii) the right to withdraw your consent in relation to our processing of your personal information based on your consent, (iv) the right to request deletion of your personal information and (iv) the right to request that we restrict processing of your personal information.

You may exercise these rights free of charge unless the request is unfounded, excessive, or otherwise unreasonable, for instance because it is repetitive. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by law. Before MSC is able to provide you with any information or correct any inaccuracies, we may ask you to verify your identity and/or provide other details to help us respond to your request. For the exercise of your rights, please contact us using the contact form of our website. In all cases, you have a right to file a complaint with a Data Protection Authority.