Title : PERSONAL DATA PROTECTION POLICY FOR EMPLOYEES OF BW EPIC KOSAN	Document Number: BWEK-HR-P-PDPA.06	No of Pages: 7
Issuing Department: Human Resource & Administration **Initial Released :** 05/12/2017 **Date Revised :** 22/11/2026 **Version No :** 06	**Approved By:**  Jakob Bode Chief Executive Officer	

1. Introduction

BW Epic Kosan recognises the importance of data protection and is committed to protecting your privacy.

This Policy describes how BW Epic Kosan Ltd., the entities directly or indirectly controlled by it and any other entity that has adopted this Policy from time to time (collectively, "**BW Epic Kosan**", "**we**", "**us**" or "**our**") may collect and process your personal data and the rights you may have in relation to that information.

The BW Epic Kosan entity responsible for your personal data will generally be the entity that determines why and how your personal data is processed. If you would like further information about which BW Epic Kosan entity is responsible for your personal data, please contact us using the details in Section 20.

This Policy applies together with any additional privacy notice or information that we may provide to you in connection with a particular processing activity.

2. What is personal data?

Personal data is any information relating to a natural person who can be identified, directly or indirectly, by reference to one or more factors specific to that person's identity. For example, personal data includes contact information and other information that identifies or can reasonably be linked to an individual.

3. Whose personal data do we collect?

The types of personal data that BW Epic Kosan collects will depend on the nature of your relationship with BW Epic Kosan. We collect personal data from a range of persons in the context of our business activities, including:

- suppliers, customers and other business contacts;
- representatives of suppliers, customers and other business contacts;
- employees, crew members, directors and job applicants;
- contractors, consultants and advisers;
- users of our websites; and
- individuals who contact us by any means.

4. How do we collect your personal data?

We may collect personal data about you in various ways, including:

- when you visit our websites and/or complete one of our web forms, including through the use of cookies and similar technologies;
- when you visit our offices, other premises and/or vessels;

- when you communicate or interact with us, including in person, by telephone, video or audio recording, video conferencing, email, social media, third-party applications or similar technologies;
- when personal data is provided to us or generated in connection with the negotiation, entry into, administration or performance of contracts and other commercial arrangements involving BW Epic Kosan;
- when others provide information to us about you, including BW Epic Kosan entities, your employer, business partners, authorities, insurers, screening providers, public databases and other third-party sources; and
- automatically from your device when you interact with our websites or other technology services.

5. What personal data do we collect?

Depending on your relationship and interactions with BW Epic Kosan, we may collect the following categories of personal data:

- **Contact information and work-related identifiers**: your name, position, role, company or organisation, telephone number, mobile number, email address, postal address, work photographs, images, videos and audio recordings, and other personal and business contact information;
- **Employment information**: data relating to your employment, potential employment or engagement with BW Epic Kosan, including education and qualifications, employment history, external appointments, emergency and next-of-kin information, and information relating to family members, dependents and beneficiaries where required for employment, benefits, insurance, emergency, legal or administrative purposes;
- **Business and contractual information**: information relating to business matters in which you and/or your company or organisation are involved with BW Epic Kosan, including information contained in or generated in connection with the negotiation, entry into, administration or performance of contracts and other commercial arrangements;
- **Account and authentication information**: usernames, logon identifiers, authentication information and other information used to access BW Epic Kosan systems, intranets, services or platforms;
- **Information from public sources**: information from LinkedIn and other social media or professional networking platforms, directories, registers and internet publications;
- **Social media**: posts and other interactions with our social media presence;
- **Attendance records**: information recording your attendance at our offices, on board vessels and on visits involving existing or potential business partners, for security and business-related purposes;
- **Subscriptions and preferences**: information provided when you subscribe to receive alerts, updates, corporate publications or newsletters, including your communication and consent preferences;
- **Events data**: registration information, attendance information and feedback relating to events run by us or which we attend;
- **Supplier data**: contact details and other information about you and/or your company or organisation where you provide products and/or services to BW Epic Kosan;
- **Technical information**: information obtained when you access our websites and technology services, including your IP address, browser type, operating system, time-zone setting, device type, hardware model, MAC address, unique device identifiers and mobile-network information;

- **Online data**: information about your use of our websites and technology services, including pages viewed or searched for, links selected, interaction information, access dates and times, referral sources, response times, download errors and other usage information; and
- **Other information**: any other information that you choose to provide in discussions and communications with us in connection with our business interactions.

6. What do we use your personal data for?

- **Employees and crew members**: to manage and administer matters relating to employment, potential employment or engagement with BW Epic Kosan, including employment records, immigration and visa requirements, insurance coverage, training, performance and development, awards, compensation and benefits, government relief or grants, medical records and other employment-related matters;
- **Provision of services**: to provide maritime transportation and related services and otherwise perform and manage our contracts, including vessel operations, chartering, cargo transportation and related operational, technical and ancillary services;
- **Business relationships**: to manage and administer our relationship with you and/or your company or organisation, including maintaining business contact, service and payment records, understanding requirements and developing those relationships;
- **Corporate communications and marketing**: to communicate information about and promote BW Epic Kosan, its business, operations, people, culture and activities, including through emails, newsletters, corporate publications, websites, social media, photographs, videos, presentations, events, conferences, media and public relations activities, recruitment, employer branding and other corporate communications and marketing materials;
- **Incidents and investigations**: to record, manage and investigate incidents, allegations or concerns relating to our vessels, other assets, offices, personnel or business activities and comply with relevant internal, insurance, legal or regulatory requirements;
- **Events**: to organise, manage and participate in events, conferences and other activities;
- **Surveys and feedback**: to obtain and respond to feedback from our employees, crew members, business partners and others and address issues or concerns raised;
- **Legal and regulatory compliance**: to comply with applicable legal and regulatory obligations, including verifying identity where required, conducting due diligence, carrying out anti-money laundering, sanctions and other compliance checks, preventing and detecting crime and responding to regulators, government authorities and law-enforcement bodies;
- **Website and technology services**: to operate, monitor, maintain and improve our websites, systems and other technology services, understand how they are used and optimise their functionality;
- **Security**: to protect our personnel, information, assets, vessels, offices, systems and technology platforms, including managing physical access and protecting against unauthorised access, misuse, malware and other security threats;
- **Business partners and suppliers**: to manage our relationships with suppliers, service providers and other business partners, including onboarding, administration and performance management; and
- **Legitimate interests**: to pursue the legitimate business interests described in Section 8, where permitted by applicable law.

7. What are our legitimate interests?

Where permitted by applicable law, our legitimate business interests may include:

- providing, managing and improving our services;
- managing our business, operations and relationships with you and/or your company or organisation;

- managing our vessels, maritime transportation services and other commercial and operational activities;
- understanding and responding to enquiries, feedback and the needs of our employees, crew members, customers, suppliers and other business partners;
- understanding how our services, websites and other technology services are used and improving their functionality;
- developing and maintaining relationships with customers, suppliers and other business partners;
- communicating about and promoting BW Epic Kosan, its business, operations, people, culture and activities, including through corporate communications, marketing, recruitment and employer-branding materials;
- managing, developing and protecting our personnel, operations, systems, vessels, assets, offices and other premises, including maintaining safety, security and business continuity;
- managing our supply chain and relationships with suppliers and service providers;
- preventing and detecting fraud, misuse, security threats and other unlawful activity;
- establishing, exercising and defending our legal rights and enforcing contractual agreements;
- sharing information within BW Epic Kosan where necessary for our business operations, administration and relationships;
- managing and recovering amounts owed to us; and
- evaluating and managing investments, corporate transactions, acquisitions, disposals, reorganisations and transfers of all or part of our business or assets.

8. Sensitive personal data and other protected information

Certain types of personal data may be considered sensitive or subject to additional protections under applicable data protection laws. Depending on the applicable law, this may include information about:

- racial or ethnic origin;
- religious or philosophical beliefs;
- health-related data;
- biometric data processed to identify a person;
- a person's sex life or sexual orientation;
- criminal convictions and offences or related security measures; and
- government-issued identification numbers, financial information and other information accorded additional protection under applicable law.

We will only process sensitive personal data or other specially protected information where permitted by applicable law and where appropriate safeguards are in place. Depending on the circumstances, this may include where:

- you have given explicit consent to the particular processing;
- you have manifestly made the personal data public;
- processing is necessary to protect your vital interests or those of another person, for example in a medical emergency;
- processing is necessary to establish, exercise or defend legal claims;
- processing is necessary for reasons of substantial public interest; or
- processing is otherwise permitted or required under applicable law.

9. Who do we share your personal data with?

We may share your personal data with the following recipients, where appropriate:

- **BW Epic Kosan entities**: entities falling within the definition of BW Epic Kosan under this Policy, including their directors, management, employees, crew members and contractors, where sharing is necessary to provide our services, manage our business or facilitate business activities and relationships involving BW Epic Kosan, you or your company or organisation;
- **Suppliers, service providers, professional advisers and business partners:** suppliers and others providing products or services to or otherwise supporting BW Epic Kosan and its business, including legal, finance, information technology, human resources, corporate secretarial, risk management, vessel-support, insurance, communications, marketing, recruitment and manning, travel and other professional, administrative or operational services. Where appropriate, they are required to meet relevant data protection and information security standards and receive personal data only as necessary for their functions;
- **Regulators, governmental authorities and law enforcement**: where disclosure is required or permitted by law or otherwise appropriate in the circumstances;
- **Appropriate parties in emergencies**: to respond to an emergency, protect rights, property, security, health or safety or prevent physical harm, vessel or asset loss or financial loss;
- **Investigation parties**: in connection with suspected or actual unlawful activity, at the request of competent authorities or to verify compliance with or investigate breaches of policies, guidelines or contractual arrangements;
- **Your company or organisation**: where relevant to our relationship with you or the provision of services;
- **Screening service providers**: to support legally required or appropriate identity, anti-money laundering, sanctions and other compliance checks;
- **Corporate transaction parties**: potential or actual investors, financiers, purchasers, sellers, joint-venture partners, professional advisers and other relevant parties in connection with investments, financings, acquisitions, disposals, joint ventures, reorganisations or transfers of all or part of our business or assets; and
- **Event participants**: other participants or delegates where your name or other relevant information is included in an attendee list for an event you have agreed to attend.

10. Personal data about others

In some cases, you may provide personal data to us about other people, such as customers, suppliers, contractors, directors, officers, employees, shareholders, beneficial owners or family members. Where you do so, you should ensure that you are lawfully permitted to provide the information to us and, where required by applicable law, that those individuals have been provided with appropriate information about that disclosure.

11. Security

We maintain reasonable technical, administrative and physical safeguards appropriate to the nature and sensitivity of the personal data we process to protect it against loss, misuse, unauthorised access or disclosure, alteration and destruction. While no method of transmission or storage can guarantee absolute security, we regularly review our safeguards having regard to applicable risks and legal requirements.

If an incident affecting personal data is reported, we will investigate it and comply with applicable notification and reporting obligations.

12. International transfers

BW Epic Kosan operates internationally and your personal data may be transferred to or accessed by BW Epic Kosan entities, service providers and business partners in countries outside the jurisdiction in which it was collected.

Data protection laws vary between countries. Where personal data is transferred internationally, BW Epic Kosan will take appropriate steps, as required by applicable data protection laws, to ensure that the personal data is appropriately protected. These may include contractual protections, recognised transfer mechanisms or other appropriate safeguards.

If you would like further information about the safeguards applicable to a particular transfer, please contact us using the details in Section 20.

13. How long do we keep your personal data?

We retain personal data only for so long as reasonably necessary for the purposes for which it was collected or as required for legitimate business, legal, accounting or regulatory purposes.

In determining the appropriate retention period, we consider factors including the nature and sensitivity of the personal data, the purposes for which it is processed, applicable legal and regulatory requirements and whether those purposes can be achieved by other means.

Personal data will be securely deleted or otherwise disposed of when it is no longer required.

14. What are your rights?

Depending on the data protection laws that apply to you and the circumstances of the processing, you may have certain rights in relation to your personal data. These rights do not apply in all circumstances and may be subject to conditions or exemptions under applicable law.

- **Access**: you may have the right to ask whether we process your personal data and request access to that personal data and certain related information.
- **Correction**: you may have the right to request correction of incomplete or inaccurate personal data we hold about you.
- **Erasure**: you may have the right to ask us to delete personal data in certain circumstances, subject to applicable exceptions, including where the personal data is required for legal compliance or the establishment, exercise or defence of legal claims.
- **Restriction**: you may have the right to request that we restrict the processing of your personal data in certain circumstances.
- **Portability**: you may have the right to receive certain personal data in a structured, commonly used and machine-readable format and, in certain circumstances, have that data transferred to another organisation.
- **Objection**: where we process your personal data based on our legitimate interests or those of a third party, you may have the right to object. Depending on the circumstances, we may be entitled to continue processing despite your objection. Where your personal data is processed for direct marketing, you may object at any time.
- **Withdrawal of consent**: where we rely on your consent, you may withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing undertaken before it was withdrawn.

If you would like to exercise or discuss any of these rights, please contact us in accordance with Section 21. You may also have the right to lodge a complaint with the relevant data protection or privacy regulator.

15. Automated decision-making

BW Epic Kosan will provide additional information where required by applicable law if it uses solely automated decision-making, including profiling, that produces legal or similarly significant effects for an individual.

16. Direct marketing

We may use your personal data to send emails, newsletters, corporate publications, event information and other communications about BW Epic Kosan that we think may be relevant to you, where permitted by applicable law.

You can opt out of receiving direct marketing communications at any time by using the unsubscribe mechanism included in the relevant communication or by contacting us in accordance with Section 20.

17. Cookies

Our websites use cookies and similar technologies that identify your browser or device and collect and store certain information when you visit. For more information about the cookies and similar technologies we use and how to manage your preferences, please see our Cookie Settings.

18. Links to third-party websites

Our websites, newsletters, published reports, social-media publications and other communications may contain links to websites owned or maintained by other parties. Personal data that you provide through those websites is not subject to this Policy and the treatment of your personal data by those websites is not our responsibility.

If you follow a link to another website, please review its privacy notice to understand how it collects and processes your personal data.

19. Children's personal data

Our services are not directed at children and we do not generally collect personal data directly from children. We may, however, process personal data relating to children where necessary for employment, benefits, insurance, emergency, legal, regulatory or other business purposes, for example where employees or crew members provide information about their children, dependants or beneficiaries.

Where we process children's personal data, we will do so in accordance with applicable data protection laws and apply appropriate safeguards having regard to the circumstances of the processing.

20. How to contact us

If you have any questions about this Policy, would like more information about how we process your personal data, wish to exercise a right or have a concern or complaint about how your personal data has been handled, please contact our Data Protection Officer at dpo@bwek.com or contact our office through https://bwek.com/contact-us/.

We will review and respond to requests and complaints in accordance with applicable data protection laws.

21. Changes to this Policy

We may update this Policy from time to time to reflect changes in our processing activities, practices or applicable legal requirements. The current version will be posted on our website.