PRIVACY NOTICE - SEAKING OY CUSTOMERS

As provided in Articles 13 and 14 of the EU's General Data Protection Regulation 2016/679 (GDPR) Effective from May 25, 2018

1 The purposes of the processing

Personal data is processed for the purpose of contacting and maintaining contact with our existing and potential customers.

2 Data controller

The data controller of the personal data processed for the purposes provided herein is SeaKing Oy (business ID 0666605-7; Valimotie 13b B, 00380 Helsinki) ("we" or "us").

Should you have any questions, you may contact our point of contact on data protection matters:

SeaKing Oy/Dataprotection

Valimotie 13b B, 00380 Helsinki

Dataprotection@seaking.net

3 Personal data

We process data of the representatives of our current, previous and potential customers (each natural person individually a "data subject"), of which we may process following personal data:

- (a) identification information such as name, the company the data subject represents and his/her title; and
- (b) contact details such as address, phone number and e-mail address.

The personal data is mainly obtained from the data subject. We may also process personal data obtained from the company that data subject represents, our cooperation partners, such as our service providers, and from publicly accessible sources, such as internet pages and trade registers.

5 The legal basis for the processing

Processing of personal data is based on following legal basis:

- (a) processing is necessary for compliance with a legal obligation to which we are subject; or
- (b) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, when the data subject is at the service of our customer or potential customer.

6 The categories of recipients to whom the personal data may disclosed

Personal data may be disclosed to SeaKing Group companies for purposes compatible with above processing purposes. In addition personal data may be disclosed to our service providers and other cooperation partners and, when required by law, to authorities.

7 Transfer of personal data outside the EU/EEA

When necessary to manage and maintain our customer relationships, the personal data may be transferred outside the EU or EEA to countries related to a specific customer relationship.

If personal data is transferred outside of the EU/EEA area, the data controller ensures that sufficient level of data protection is maintained through appropriate safety measures, e.g. EU commission's model clauses

8 Period for which the personal data will be stored

All personal data of a data subject shall be deleted from our systems after the data subject no longer represents our existing, previous or potential customer, unless retention of certain information is required by law, in case of which the personal data shall be stored for the period required by law.

In case certain or specific personal data may not be deleted from a certain system without causing a risk to the processing of the remaining personal data, for example when metadata or a backup copy may not be deleted without materially effecting the functionality of a respective system, the personal data shall be stored for a longer period, but deleted as soon as it is reasonably possible.

9 Rights of the data subjects

Each data subject has the right to

- (i) request access to and rectification or erasure of its personal data;
- (ii) request restriction of the processing of its personal data;
- (iii) object to processing; and
- (iv) data portability, which means that the data subject may receive the personal data he/she has provided to us, in a structured commonly used and machine-readable format and transmit such data to another controller.

Any request shall be made to the point of contact provided above.

We will do our best to implement data subject requests. However, sometimes we must refuse a request, in which case we shall inform the respective data subject of such refusal.

In case a data subject considers that our processing of personal data does not meet the requirements of the data protection legislation, she/she may lodge a complaint with a supervisory authority (in Finland the Finnish Data Protection Ombudsman).