

1. Scope

This policy applies to Mr Marine Group BV's training and awareness programme where relevant to the GDPR, compliance with the GDPR, and other matters relating to data protection and privacy.

2. Training policy

- 2.1 Data Protection Officer / GDPR Owner assigns data protection responsibilities to Employees/Staff in relation to Mr Marine Group BV's policies and procedures on personal data management.
- 2.2 Data Protection Officer / GDPR Owner shall ensure that all Employees/Staff with day-to-day responsibilities involving personal data and processing operations, and those with permanent/regular access to personal data, demonstrate compliance with the GDPR.
- 2.3 These members of Employees/Staff are able to demonstrate competence in their understanding of the GDPR how this is practised and implemented throughout Mr Marine Group BV.
- 2.4 Data Protection Officer / GDPR Owner ensures that these members of Employees/Staff are kept up to date and informed of any issues related to personal data.
- 2.5 Data Protection Officer / GDPR Owner maintains a list of relevant external bodies, the most important of which is the *Dutch Personal Data Authority*.
- 2.6 Board of Directors promote training and awareness programmes, and Mr Marine Group BV shall make resources available in order to raise awareness. The Data Protection Officer / GDPR Owner shall demonstrate and communicate to Employees/Staff the importance of data protection in their role and ensure that they understand how and why personal data is processed in accordance with Mr Marine Group BV's policies and procedures.
- 2.7 Data Protection Officer / GDPR Owner ensures that all security requirements related to data protection are demonstrated and communicated to Employees/Staff to the same affect.
- 2.8 Employees/Staff are provided with specific training on processing personal data relevant to their individual day-to-day roles and responsibilities, and in accordance with Mr Marine Group BV's policies and procedures.
- 2.9 Employees/Staff are provided with specific training on any information security requirements and procedures applicable to data protection and the data processing within their individual day-to-day roles and responsibilities, including reporting personal data breaches.
- 2.10 Employees/Staff are provided with training on dealing with complaints relating to data protection and processing personal data.
- 2.11 Data Protection Officer retain records of the relevant training undertaken by each person who has this level of responsibility.
- 2.12 The Data Protection Officer / GDPR Owner and HR Department are responsible for organising relevant training for all responsible individuals and Employees/Staff generally, and for maintaining records of the attendance of staff at relevant training at appropriate times across Mr Marine Group BV's business cycle.

GDPR TRAINING POLICY (TIER 1)

Document Control

Reference: GDPR DOC 1.1

Issue No: 1.0

Issue Date: 10/11/2023

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Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the company's shared drive and is published on the company's shared drive.

This policy was approved by the COO on 10/11/2023 and is issued on a version-controlled basis under the signature of the Chief Operations Officer (COO).

Signature: 

Date: 14/11/2023

Change History Record

| Issue | Description of Change | Approval | Date of Issue |
|-------|-----------------------|------------------|---------------|
| 1 | Initial issue | Mihnea Radulescu | 10/11/2023 |
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