

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Mr Marine Group BV collecting/processing their personal data.
- 2.2 All Employees/Staff of Mr Marine Group BV who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Since 2002, Mr. Marine has been serving ships worldwide. With a global network of 150 technicians present in 350+ ports, we ensure vessels' safety and compliance 24/7, delivering excellent customer service, and exceeding our customers' expectations.

- **Mr. Marine Elevator** is the global leader in marine elevators servicing, performing jobs from Annual Safety Inspections to modernizations.
- **Mr. Marine Ballast** ensures the compliance of the vessels to the BWT Convention.
- **Mr. Marine Instruments & Controls** is at your disposal for fire and gas detection, test and calibration equipment, marine automation and instruments, among others.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

PRIVACY NOTICE (TIER 4)

Document Control

Reference: GDPR REC 4.1

Issue No: 1.0

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- Mihnea Radulescu
- dpo@mr-marinegroup.com

The personal data we may *collect from you* is:

Personal data type:	Source
Identification Data Examples: Social Security Number, Passport Number, Driver's License Number, National ID Number, Employee ID.	Data Subject
Contact Information Examples: Email Address, Phone Number, Mailing Address	Data Subject
Financial and Payment Data: Examples: Bank Account Details, , Financial Statements, Tax Identification Number.	Data Subject
Employment and Professional Data Examples: Employment History, Job Title, Company Name, Professional Certifications, Work Experience.	Data Subject
Demographic Information Examples: Age, Gender, Marital Status, Education Level, Household Income, Occupation	Data Subject

The personal data we collect will be used for the following purposes:

- **Contractual performance:** We will process your personal data to fulfill the terms and obligations outlined in our contract, ensuring the delivery of services or products.
- **Financial Transaction Processing:** Your financial and payment data will be used for the secure and efficient processing of financial transactions related to the work or services provided under the contract.
- **Informative Communications:** We may use your contact information to provide you with informative updates about our company's activities, products, and services. These communications are intended to keep you informed and are based on our legitimate interests in maintaining a beneficial business relationship with our vendors and B2B contacts.

Our legal basis for processing for the personal data:

- **Legitimate Interest:** We process your personal data based on our legitimate interests, which include maintaining a beneficial business relationship with our vendors and B2B contacts by providing informative communications and ensuring contractual performance.
- **Performance of Contract:** Additionally, we process your personal data as required for the performance of our contract with you.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- **Maintaining a Beneficial Business Relationship:** We have a legitimate interest in maintaining a beneficial business relationship with our vendors and B2B contacts. This includes providing updates and communications about our company's activities, products, and services to keep you informed and engaged.
- **Ensuring Contractual Performance:** It is in our legitimate interest to process personal data as required for the performance of contracts we have with our vendors and B2B contacts.
- **Protecting Data Security:** We have a legitimate interest in safeguarding the security and integrity of personal data, which includes measures to prevent unauthorized access, data breaches, and other security threats.
- **Improving Services and Products:** We may analyze data to improve our services and products, which benefits both our organization and our vendors and B2B contacts.
- **Compliance with Legal Obligations:** We have a legitimate interest in processing data to comply with legal and regulatory requirements.
- **Preventing Fraud and Abuse:** Processing personal data is essential to detect and prevent fraudulent activities and abuse, which helps protect our organization and its stakeholders.

3.2 Consent

By entering into a contract with us or availing our services, you are giving us permission to process your personal data specifically for the purposes identified. This consent is implicit in the contractual relationship, as data processing is necessary for the performance of the contract. We process both types of personal data, as outlined in this privacy notice, based on the contractual obligations and the legitimate interests pursued by our organization.

You may withdraw consent at any time by *submitting a request to dpo@mr-marinegroup.com*.

3.3 Disclosure

Mr Marine Group BV may share your personal data with third parties for specific purposes as part of the processing activities. These third parties may include, but are not limited to:

1. **Service providers:** To facilitate aspects of our business operations, such as payment processing, IT support, or marketing services.
2. **Legal or regulatory authorities:** To comply with legal obligations or respond to lawful requests.
3. **Business partners:** In cases where it is necessary to fulfill contractual obligations or improve our products and services.

3.4 Retention period

Mr. Marine Group BV will process personal data for the duration necessary to fulfill the purposes for which it was collected. The retention period for the storage of personal data will be determined based on the applicable legal requirements, contractual obligations, and business needs.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Mr Marine Group BV refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

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3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Mr Marine Group BV (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Mr Marine Group BV's data protection representatives Data Protection Officer:

	Supervisory authority contact details	Data Protection Officer Contact Details
Contact Name:	Dutch Data Protection Authority (Dutch DPA) - Autoriteit Persoonsgegevens	Mihnea Radulescu
Address line 1:	Hoge Nieuwstraat 8 2514EL The Hague	Walenburgerplein 106, 3039AN, Rotterdam
Address line 2:	Dutch Personal Data Authority PO Box 93374 2509 AJ The Hague	
Email:	pers@autoriteitpersoonsgegevens.nl	dpo@mr-marinegroup.com
Telephone:	(+31) - (0)70 - 8888 500	+31 10 714 48 82

3.7 Privacy statement

Read more about how and why we use your data here <https://mr-marinegroup.com/gdpr>

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Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

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

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

Signature: 

Date: 14/11/2023

Change History Record

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