

# **Privacy Policy**

#### **BACKGROUND**

This Policy applies as between you, the User of this Web Site and Seaco Global Limited, the provider of this Web Site ("us"). This Policy applies to our use of any, and all Data collected by us in relation to your use of the Web Site and any Services or Systems therein.

This Privacy Policy describes the policies of Seaco Global Limited, 4th Floor, Union House, 182-194 Union Street, London SE1 OLH, United Kingdom of Great Britain and Northern Ireland (the), email: <a href="marketing@seacoglobal.com">marketing@seacoglobal.com</a>, on the collection, use and disclosure of your information that we collect when you use our website (https://seacoglobal.com/). (the "Service"). By accessing or using the Service, you are consenting to the collection, use and disclosure of your information in accordance with this Privacy Policy. If you do not consent to the same, please do not access or use the Service.

# 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account"	means collectively the personal information, Payment Information and credentials used by Users to access Material and / or any communications System on the Web Site;
"Content"	means any text, graphics, images, audio, video, software, data compilations and any other form of information (including look and feel) capable of being stored in or conveyed through a computer that appears on or forms part of this Web Site;
"Cookie"	means a small text file placed on your computer by us when you visit certain parts of this Web Site. This allows us to, inter alia, identify recurring visitors and to analyse their browsing habits within the Web Site.
"Data"	means collectively all information that you submit to the Web Site. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems;
"Seaco Group"	means Seaco Srl and affiliates
"Service"	means collectively any online facilities, tools, services, or information that we make available through the Web Site either now or in the future;
"System"	means any online communications infrastructure that we make available through the Web Site either now or in the future. This includes, but is not limited to, web-based email, message boards, live chat facilities and email links;
"Web Site"	means the website that you are currently using (www.seacoglobal.com) and any sub-domains of this site unless expressly excluded by their own terms and conditions.
"User"/ "Users"	means any third party that accesses the Web Site and is not employed by the Seaco Group and acting in the course of their employment;

#### 2. Data Collected

Without limitation, any of the following Data may be collected:

- 1. Name
- 2. Date of Birth
- 3. Gender
- 4. Job Title
- 5. Company Name
- 6. Industry Sector
- 7. Contact information such as email addresses, and mobile/telephone numbers
- 8. Demographic information such as post code, preferences, and interests
- 9. Financial information such as credit / debit card numbers
- 10. IP address
- 11. Web browser type and version
- 12. Operating System
- 13. A list of URLS starting with a referring site, your activity on this Web Site, and the site you exit to;
- 14. Cookie information.
  - Technical Data, including Data which falls under one or more of the subparagraphs above, may be collected automatically, without further notifying the User.

#### 3. How We Use Your Information

Any personal Data you submit will be retained by us for as long as you use the Services and Systems provided on the Web Site. Data that you may submit through any communications System that we may provide may be retained for a period of up to 7 years, or such other length of time as is stipulated in our internal policies.

Unless we are obliged or permitted by law to do so, and subject to Clause 4, your Data will not be disclosed to third parties, save other entities in the Seaco Group and its' third-party suppliers. All personal Data is stored securely in accordance with the principles of the Data Protection Act 2018. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Web Site.

Further and more specifically, Data may be used by us for the following reasons:

- 1. Internal record keeping
- 2. Improvement of our products / services
- 3. Transmission by email of promotional materials that may be of interest to you
- 4. Contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Web Site.

### 4. Third Party Web Sites and Services

We may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment handling, delivery of purchased items, search engine facilities, advertising, and marketing. The providers of such services may have access to certain personal Data provided by Users of this Web Site.

## 5. Changes of Business Ownership and Control

- 1. We may, from time to time, expand or reduce our business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.
- 2. In the event that any Data submitted by Users will be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## **6. Your Right to Withhold Information**

- 1. You may access certain areas of the Web Site without providing any Data at all. However, to use all Services and Systems available on the Web Site you may be required to submit Account information or other Data.
- 2. You may restrict your internet browser's use of Cookies. For more information see clause 8.4 below.
- 3. Depending on the law that applies, you may have a right to access and rectify or erase your personal data or receive a copy of your personal data, restrict or object to the active processing of your data, ask us to share (port) your personal information to another entity, withdraw any consent you provided to us to process your data, a right to lodge a complaint with a statutory authority and such other rights as may be relevant under applicable laws. To exercise these rights, you can write to us at monique.robinson@seacoglobal.com. We will respond to your request in accordance with applicable law.
- 4. Do note that if you do not allow us to collect or process the required personal information or withdraw the consent to process the same for the required purposes, you may not be able to access or use the services for which your information was sought.

## 7. Accessing your own Data

You have the right to ask for a copy of your personal Data. We will process your request within 30 days.

#### 9. Cookies etc.

We may set and access Cookies on your computer.

- 1. A Cookie is a small file that resides on your computer's hard drive and often contains an anonymous unique identifier and is accessible only by the web site that placed it there, not any other sites.
- 2. You may delete Cookies; however, you may lose information that enables you to access the Web Site more quickly.
- 3. You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of Services available on the Web Site.

Please refer to our Cookie Policy for more detailed information.

### 10. Google Analytics

We use a tool called "Google Analytics" to collect information about use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information.

#### 11. Security

The security of your information is important to us and we will use reasonable security measures to prevent the loss, misuse or unauthorized alteration of your information under our control. However, given the inherent risks, we cannot guarantee absolute security and consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

## 12. Your Rights under GDPR (General Data Protection Regulation)

To make enquiries for information regarding your rights in this Privacy Policy, please contact our Data Protection Officer by email to: <a href="mailto:dpo@seacoglobal.com">dpo@seacoglobal.com</a> or by post to:

The Data Protection Officer Seaco Global Ltd 4th Floor, Union House 182-194 Union Street London SE1 0LH

We will address your concerns in accordance with applicable law.

# 11. Changes to this Policy

We reserve the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be posted on the Web Site, and you are deemed to have accepted the terms of the Policy on your first use of the Web Site following the alterations.

We therefore recommend that you periodically review this page.