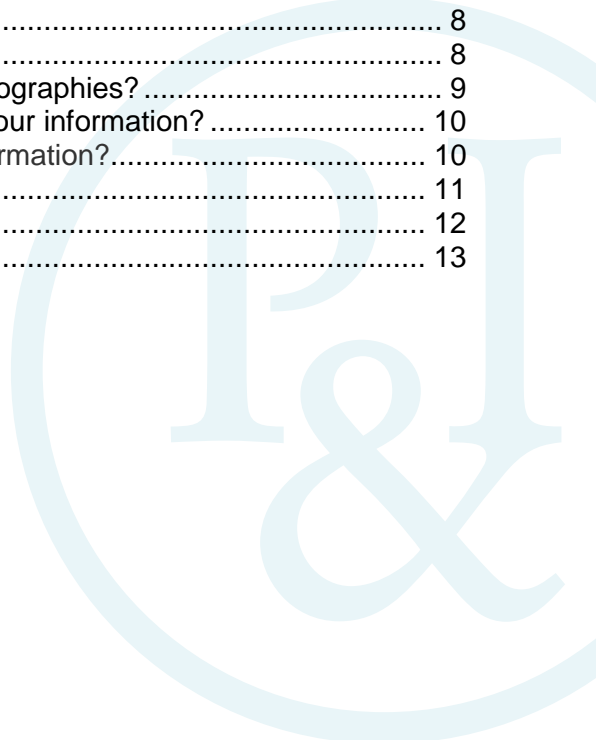




# PRIVACY STATEMENT

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**Post & Co**

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## 1. Introduction

Post & Co is the independent partner for Marine Liability and Logistics insurances for all players in the logistical chain, such as Ship Owners and Charterers, Terminal and Transport Operators, NVOCC's, Transport Intermediaries and Port Authorities, with our registered Head Office at Blaak 31 Rotterdam 3011 GA, Netherlands. Post & Co is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

Throughout this Statement, "Post & Co" refers to Post & Co (P & I) B.V. Post & Co (Belgium) B.V., Post & Co (Assekuranzkontor) GMBH, including affiliated companies and subsidiaries (also referred to as "we", "us", or "our").



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## 2. What does this Privacy Statement do?

This Privacy Statement ("Statement") explains how Post & Co collects, uses, shares and retains personal information you provided to us and any personal information we collect from other sources. This Statement is a statement of our practices and of your rights regarding your personal information. This does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

This Statement does not apply to your use of a third party site linked to on our website.

## 3. When and how do we collect your information?

You directly provide Post & Co with most of the data we collect and process. Post & Co collects and process personal information and data:

- **When we perform services for our clients**  
Our services and products include insurance broking, claims management, risk management consulting, other forms of insurance services (including but not limited to underwriting of insurance products and reinsurance). In these cases, your personal information will normally be provided to us by our clients (and / or advisors or service providers acting on behalf of our clients), or sometimes our clients may ask us to contact you directly. We may also need to obtain information from third parties such as insurance companies, insurance brokers financial institutions, surveyors, legal counsel and medical specialists.
- **When you request a service from us**  
For example, if you ask us to obtain insurance quotes on your behalf, or if you contact us as a representative of your employer to enquire about a professional service you would like us to offer to your company.
- **When you use or view our website, applications or complete any forms pertaining to Post & Co**
- **When you apply for a position at Post & Co**  
You may provide this information directly (through an online recruitment portal, careers site or via correspondence), or via an agency.
- **If you contact us with a complaint or query**



#### 4. What information do we collect?

Where we collect and need to use personal information for careful consideration and legitimate business purposes and to ensure we offer our services effectively and efficiently so as to meet the client's requirements and our legal obligation, we do so in a confidential manner and on a basis of absolute necessity.

##### *Information you provide to us*

When you request services (whether as an individual or through a proxy), we ask that you provide accurate and necessary information that enables us to respond to your request. When a visitor provides personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection, for example providing an insurance quote or applying for a position at Post & Co.

When we provide the services listed above for our clients, we may collect the following:

- personal information such as your name, contact details, date of birth, gender, marital status, financial details, employment details, and benefit coverage.
- sensitive information, this will be done strictly relevant to the services we provide. Sensitive information includes a number of types of data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record.

We will not collect any sensitive information unless this is required. We suggest that you do not provide sensitive information of this nature unless we specifically request this information.

If you provide us with sensitive personal information, you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this Statement. If you provide personal information about other individuals such as employees or dependents, you must obtain their consent prior to your disclosure to us.

We may ask you for some or all of the following types of information when you register for events, request services, manage accounts, access various content and features or directly visit our website. This includes, but is not limited to:

- Contact information, such as name, e-mail address, postal address, phone number and mobile number;
- User name, password, password reminder questions and password answers;
- Communication preferences, such as which newsletters you would like to receive;
- Search queries;



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- Contact information about others when you refer someone to a particular site or service (note: this information is used solely to facilitate requested communications); and
- In some instances, we automatically collect certain types of information when you visit our website and through e-mails that we may exchange.

#### *Social Media:*

You can engage with us through social media websites or through features such as plug-ins or applications on Post & Co websites that integrate with social media sites. When you engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

If you post information when you interact with our website through social media sites, plug-ins or other applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on social media sites. For more information about how you can customize your privacy settings and how third party social media sites handle your personally identifiable information, please refer to their privacy help guides, privacy notices and terms of use.

#### *Mobile Devices:*

If you access our website on your mobile telephone or mobile device, we may also collect your unique device identifier, as well as information about your device's operating system, mobile carrier and your location information.

## **5. How do we use your personal information?**

Post & Co always strive to provide a clear, honest and transparent approach regarding how and when we collect and use personal data. The following is a summary of the purposes for which we use personal information.

#### *Performing services for our clients*

We process personal information which our clients provide to us in order to perform our professional consultancy and risk based advisory services. The precise purposes for which your personal information is processed will be determined by the scope and specification of our engagement, and by applicable laws, regulatory guidance and professional standards.

#### *Administering our client engagements*

We process personal information about our clients and the individual representatives of our corporate clients in order to:



- carry out "Know Your Client" checks and screening prior to starting a new engagement;
- carry out client communication, service, billing and administration;
- deal with client complaints;
- administer claims;

#### *Contacting and marketing our clients and prospective clients*

We will never seek to commercially exploit any personal data we hold. We process personal information, subject to appropriate consent, about our clients and the individual representatives of our corporate clients in order to:

- contact our clients in relation to current, future and proposed engagements;
- send our clients newsletters, and other marketing communications;
- determine the level of our services, as described above, to better understand trends in the specific insurance market which Post & Co services. This type of information helps inform our approach towards our general business development and to allow Post & Co to be more effective and service-led. Understanding our clients and their preferred method of doing business also helps us provide a better customer service.

#### *Conducting data analytics*

Post & Co offers unparalleled service, which relies on developing sophisticated products and services by drawing on our experience from prior engagements. Post & Co is not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of Post & Co's activities are ensured through the use of aggregated or otherwise de-identified data.

#### *Other uses*

- Provide information and services as requested by you;
- Determine eligibility and process applications for products and services;
- Provide information and services as requested by clients;
- Understand and assess clients' ongoing needs and offer products and services to meet those needs;
- Obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit;
- Execute, monitoring and training; and



- Conduct processing necessary to fulfil other contractual obligations for the individual. If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

#### *Legal basis for using information*

All use of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract;
- the processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators); or
- the processing is in our legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use personal information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party). In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any special categories of data, or criminal record data, we will establish a lawful exemption which will allow us to use that information. This exemption will typically be:

- your explicit consent;
- the establishment, exercise or defence by us or third parties of legal claims; or
- a context specific exemption provided for under local laws of EU Member States and other countries implementing the GDPR, such as in relation to the processing of special category data for insurance purposes.

#### **6. Do we collect information from children?**

Our websites are not directed to children and we do not knowingly collect personal information from children on our websites. Children are prohibited from using our websites.





## 7. How long do we retain your personal information?

How long we retain your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information for the period necessary to fulfil the purposes described in this Statement unless a longer retention period is permitted by law, in accordance with our Record Retention Policy, which can be obtained on request as mentioned herein below in clause 12.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

## 8. Do we disclose your personal information?

The data we hold we treat as proprietary and sensitive and is only used to further our relationship with our clients, business partners and employees.

### *Within Post & Co*

We may share your personal information with other Post & Co entities, divisions, and subsidiaries to serve you, including for the activities listed in this statement.

We do not rent, sell or otherwise disclose personal information about our online visitors with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances discussed below.

### *Business Partners*

We disclose personal information to business partners who provide certain specialized services to us, or who co-operate with us on projects. These business partners operate as separate controllers, and are responsible for their own compliance with data protection laws. Our privacy policy applies only to our website and company, so if you click on a link to another website, you should read their privacy policy.

Examples include: *Insurance broking and insurance products* - insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, medical service providers, fraud detection agencies, our advisers such as loss adjusters, lawyers and accountants and others involved in the claims handling process.

### *Authorized Service Providers*





We may disclose your information to service providers we have retained (as processors) to perform services on our behalf (either in relation to services performed for our clients, or information which Post & Co uses for its own purposes). These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, 'How we use your personal information.'

Examples include: IT service providers who manage our IT and back office systems and telecommunications networks;

These third parties appropriately safeguard your data, and their activities are limited to the purposes for which your data was provided.

#### *Legal Requirements and Business Transfers*

We may disclose personal information:

- if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request.
- in response to law enforcement authority or other government official requests,
- when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss,
- in connection with an investigation of suspected or actual illegal activity or
- in the event that Post & Co is subject to a merger or acquisition to the new owner of the business.
- Disclosure may also be required for company audits or to investigate a complaint or security threat.

#### *Cookies on Website and Notices*

Cookies are used to track visitor use of the website and compile statistical reports. Post & Co use Google Analytics to help us understand how our website is performing and to collect data about traffic through our website. Automated technologies, such as Google Analytics, may include the use of web server logs to collect IP addresses, "cookies" and web beacons. A browser can be set to not accept cookies and you are referred to your preferred browser on how this can be done. Our website is not utilised for collecting marketing data and statistics are only gathered on its usage.

## **9. Do we transfer your personal information across geographies?**



We are an organization that works in a global market and may transfer certain personal information across geographical borders to Post & Co entities, authorized service providers or business partners in other countries working on our behalf in accordance with applicable law. Our affiliates and third parties may be based locally or they may be overseas some of which have not been determined by the European Commission to have an adequate level of data protection.

When we do, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data:

- we ensure transfers within Post & Co are covered by agreements based on the EU Commission's standard contractual clauses, which contractually oblige each member to ensure that personal information receives an adequate and consistent level of protection wherever it resides within Post & Co;
- where we transfer your personal information outside Post & Co or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States, or the standard contractual clauses; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us as noted below. You also have a right to contact us for more information about the safeguards we have put in place to ensure the adequate protection of your personal information when this is transferred as mentioned above.

#### **10. Do we have security measures in place to protect your information?**

The security of your personal information is important to us and Post & Co has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

#### **11. What choices do you have about your personal information?**



We offer certain choices about how we communicate with our clients and what personal information we obtain about them and share with others. When you provide us with personal details, if we intend to use those details for marketing purposes, we will provide you with the option of whether you wish to receive promotional e-mails (also in the form of a newsletter). At any time, you may opt out from receiving interest-based advertising from us by contacting us.

*How can you update your communication preferences?*

We take reasonable steps to provide you with communication about your information. You can update your communication preferences in the following ways:

*Newsletters*

If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

*E-mail*

Contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing or changing and your requested changes.

## **12. Other rights regarding your data**

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, our company would like to make sure you are fully aware of all data protection rights.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us, as noted in paragraph 12 below. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

*Right to Access*

You have right to access personal information which Post & Co holds about you.

*Right to Rectification*





You have a right to request us to correct your personal information where it is inaccurate or out of date.

#### *Right to be Forgotten*

You have the right under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data, as referred to herein above .

#### *Right to Restrict Processing*

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

#### *Right to Data Portability*

You have the right to request that our company transfer the data that we have collected to you or another organisation in machine readable format, but only where the processing of that information is based on consent; or the performance of a contract to which you are a party.

#### *Right to Object to Processing*

You have the right to object the processing of your personal information at any time, but only where that processing has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights.

#### *Right to Decline Automated Decision Making*

We do not use automated decision making (including factual or digitally automated decision making using profiling) when processing your personal information.

### **13. Contact Us**





If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the Act or this Statement, please contact: [compliance@post-co.com](mailto:compliance@post-co.com). Alternatively, you have the right to contact your local Data Protection Authority, but we encourage you to make contact with us first before doing so.

If you have any questions relating to this Statement, please contact us at the Post & Co Head Office, Blaak 31, Rotterdam 3011 GA or [info@post-co.com](mailto:info@post-co.com) or call us on +31 10 453 58 88.

#### **14. Changes to this Statement**

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 10<sup>th</sup> October 2019.

We encourage you to periodically review this Statement so that you will be aware of our privacy practices.

