

PRIVACY NOTICE

Scope

This document provides you with information about how we are handling, or are intending to handle, your personal information.

If you are aged 16 or under, please get your parent/guardian's permission before you provide any personal information to us.

Who "we" are

Solace Global is the trading name of Solace Global Risk Ltd, Company Number 07176579 and Solace Global Maritime Ltd, Company Number 07262248. Both registered in England & Wales.

Solace Global is committed to protecting and respecting your privacy and complying with the principles of applicable data protection laws including GDPR. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The data controller of the personal data referred to in this policy is Solace Global and our data privacy officer can be contacted at admin@solaceglobal.com

Privacy Promise

We promise to process your personal data in accordance with the following principles of good practice which provide that personal data must be:

- a) processed lawfully, fairly and in a transparent way;
- (b) collected for specified, explicit and legitimate purposes, and processed in a way that is compatible with those purposes;
- (c) adequate, relevant and limited to what is necessary to carry out the purposes;
- (d) accurate and, where necessary, kept up to date;
- (e) kept for no longer than is necessary for the purposes for which the personal data are processed;
- (f) kept secure and protected against unauthorised / unlawful processing and against loss or damage; and
- (g) processed in accordance with the data subjects' rights.

Collection of Personal data

We collect a wide range of personal information depending upon the nature of our relationship with you as the data subject.

- Staff – we collect and process personal data including names, addresses, phone numbers, email addresses, National Insurance number, date of birth, bank details, emergency contact, gender and personal identification documents. These are collected to ensure we fulfil our legal obligations as employer and only names are shared with customers or suppliers in performance of our contract obligations.

- Clients/Potential Clients/Suppliers – we always intend to collect the minimum amount of personal information necessary (name, address, email address and phone numbers) to provide you with the services contractually agreed between ourselves.
- Solace Secure Users – we collect the following information as a minimum name, mobile telephone number, e-mail address and in addition we collect travel itinerary (if Customer has purchased this service) and location data (if the user has consented to share their location) this is to ensure we are able to provide the services we are contracted to provide between ourselves.

How do we collect your personal data

We may collect personal information about you (or your business) from the following sources:

- When you apply for employment
- When you contact us by email or visit our website
- When you talk to us on the phone
- When you are registered by your employer as a user of one of our products or services
- When you register as a user of one of our products or services
- When you share your location data with us using one of our services

Disclosing and sharing of personal data

The personal data and sensitive data identified is shared with some of our suppliers who process data on our behalf to help us to provide services to you. We undertake this data sharing based on our legitimate interests.

How long will the information be stored

We look to hold records no longer than is necessary, however as part of our data protection procedure we maintain a record register which details the maximum period that each record type is held for. Also, within our contracts we clearly state retention procedure following the expiry of such contracts.

Transferring Personal Data outside the UK/EEA

Solace Global may transfer any personal data it holds to a country outside the United Kingdom (UK) and European Economic Area ("EEA"), provided that one of the following conditions applies:

- (a) the country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms.
- (b) the transfer is made with the data subject's informed consent;
- (c) the transfer is necessary for the performance of a contract with the data subject or for pre-contractual steps taken at the data subject's request;
- (d) the transfer is necessary in the establishment, exercise or defence of legal claims;
- (e) the transfer is necessary to protect the vital interests of the data subject or other persons, where the data subject is physically or legally incapable of giving consent; or

- (f) the transfer is made from a register which under UK or EEA law is intended to provide information to the public (and which is open to consultation by either the public in general or those able to show a legitimate interest in inspecting the register).

Subject to the requirements set out above, personal data held by Solace Global may also be processed by staff operating outside the UK or EEA who work for Solace Global or for one of its suppliers. That staff maybe engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

The data subject's rights

You have the following rights as a Data Subject:

- **Right of access** - You have the right to obtain a copy of information we hold about you
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it.
- **Right to be forgotten** – If you no longer wish us to hold your data, we will delete it. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.
- **Right to restriction of processing** - You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- **Right to Portability** - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- **Right to Object** - You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- **Right to Withdraw Consent** - You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.
- **Right of Complaint** - You also have the right to lodge a complaint about any aspect of how we are handling your data with the *UK Information Commissioner's Office*, which can be contacted at www.ico.org.uk.

How we use Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most

web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other Websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on this page.

How to contact us

If you wish to contact us about your personal data or exercise any of the rights described above please contact our data privacy officer at admin@solaceglobal.com or write to Data Privacy Officer, Solace Global Limited, Twin Sails House, West Quay Road, Poole, Dorset, UK BH15 1JF.

If you are in the European Union, you may address privacy-related inquiries to our EU representative pursuant to Article 27 EU GDPR:

EU-REP.Global GmbH

www.eu-rep.global

Attn: Solace Global Risk Ltd.

Hopfenstr. 1d, 24114 Kiel, Germany

solaceglobal@eu-rep.global