



GRINDROD SHIPPING GROUP POLICY

DATA PROTECTION NOTICE

Document number	B23
Revision number	V02
Issue date	26 November 2018
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Approval	Executive Committee

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1. INTRODUCTION

This Data Protection Notice (“Notice”) sets out the basis which Grindrod Shipping Holdings Ltd. (“we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data in accordance with the Personal Data Protection Act 2012 (“PDPA”). The PDPA obligations are similar to South African legislation, the Protection of Personal Information Act, No. 4 of 2013 (“POPI”) and will be reviewed for compliance when POPI is effective.

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organizations which we have engaged to collect, use, disclose or process personal data for our purposes. In general, before we collect any personal data from you, we will notify you of the purposes for which your personal data may be collected, used and disclosed, as well as obtain consent for the intended purposes.

2. PERSONAL DATA

2.1 As used in this Notice:

(a) “**customer**” means an individual who (a) has contacted us through any means to find out more about any services we provide, or (b) may, or has, entered into a contract with us for the supply of services by us;

(b) “**employee**” means (a) an individual who is evaluating an application to be an employee with us or (b) administering your relationship as our employee, dealing with employment benefits or other employee welfare programs; and

(c) “**personal data**” means data, whether true or not, about a customer or employee who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2.2 Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name and identification information such as your National Registration Identity Card (“NRIC”) number, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information and financial information such as credit card numbers, debit card numbers or bank account information.

2.3 Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

3. **COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA**

- 3.1 We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorized by you to disclose your personal data to us (your “**authorized representative**”) after (i) you (or your authorized representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorized representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you or of which you are already aware (except where permitted or authorized by law).
- 3.2 We may collect and use your personal data for any or all of the following purposes:
- a. performing obligations in the course of or in connection with our provision of the services requested by you;
 - b. verifying your identity;
 - c. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you; managing your relationship with us;
 - d. processing payment or credit transactions;
 - e. sending you marketing information about our goods or services including notifying you of our marketing events, initiatives and functions;
 - f. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - g. any other purposes for which you have provided the information;

- h. transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- i. any other incidental business purposes related to or in connection with the above.

3.3 We may disclose your personal data:

- a. where such disclosure is required for performing obligations in the course of or in connection with our provision of the services requested by you; or
- b. to third party service providers, agents and other organizations we have engaged to perform any of the functions listed in clause 3.2 for us.

3.4 The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

4. WITHDRAWAL OF CONSENT

4.1 The consent that you provide by the acceptance of and continued use of our services for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer (see clause 10.) for contact details.

4.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within fourteen (14) business days of receiving it.

- 4.3 Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 4.1 above.
- 4.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

5. ACCESS TO AND CORRECTION OF PERSONAL DATA

- 5.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 5.2 We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

6. PROTECTION OF PERSONAL DATA

- 6.1 To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced administrative, physical and technical measures such as antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us.
- 6.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

7. ACCURACY OF PERSONAL DATA

7.1 We generally rely on personal data provided by you (or your authorized representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

8. RETENTION OF PERSONAL DATA

8.1 We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

9. TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

9.1 It is within the scope of services we provide that your personal data may be transferred outside of Singapore within the scope of the purposes identified in clause 3.2 and in accepting our services, your consent is provided. We will endeavour to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

10. DATA PROTECTION OFFICER

10.1 You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Email: dpo@Grindrodshipping.com

Address: 200 Cantonment Road, #03-01 Southpoint, Singapore 089763

Tel: +65 6632 1361

11. **ADDITIONAL INFORMATION TO DEAL WITH THE EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (EU) 2016/679 (“GDPR”)**

- 11.1 This section 11 applies only if a particular circumstance or activity applicable to us requires the application of the GDPR. Subject to the aforesaid, in such cases, this section 11 would apply to residents of the European Union only.
- 11.2 Generally, we process personal data on the basis of consent. Apart from consent, under the GDPR, we may also lawfully process your personal data on one or more of the following bases:
- (a) This processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering the contract;
 - (b) Necessary for compliance with a legal obligation to which we are subjected to;
 - (c) Necessary in order to protect the vital interests of the data subject or another natural person;
 - (d) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- 11.3 Where your personal data is transferred to a country for which the European Commission has not made an adequacy decision, we will endeavor to ensure that the foreign recipient organization of the personal data is bound by legally enforceable obligations to protect the transferred personal data.
- 11.4 When the GDPR is applicable, you have the following rights (subject to any exceptions under the GDPR):
- (a) **Access**: You have the right to request confirmation of whether we process your personal data, a copy of the personal data we are processing about you, and other information relating to your personal data as provided for in the GDPR.

- (b) **Rectification**: You have the right to have incomplete or inaccurate personal data that we process about you rectified.
 - (c) **Erasure**: You have the right to request that we delete personal data that we process about you if one of the grounds for erasure under the GDPR applies.
 - (d) **Restriction of processing**: You have the right to restrict our processing of your personal data if one of the grounds for such restriction under the GDPR applies, such as where you believe such data to be inaccurate, our processing is unlawful; or that we no longer need to process such data for a particular purpose, pursuant to the full terms of the grounds as provided in the GDPR.
 - (e) **Data portability**: You have the right to obtain personal data we hold about you, in a structured, commonly used, electronic format, and to transmit such data to another data controller, if certain conditions under the GDPR are satisfied.
 - (f) **Objection to processing**: You have the right to object to our processing of your personal data where such personal data is being processed by us for the performance of a task carried out in the public interest, or in the exercise of official authority vested in us, or for the purposes of the legitimate interests pursued by us. Additionally, you have the right at any time to object to our processing of your personal data for direct marketing. Further, you have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes, subject to condition(s) in the GDPR.
 - (g) **Withdrawing Consent**: If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge.
- 11.5 You also have the right to lodge a complaint with the local data protection authority or the European data protection authority applicable to you if you believe that we have not complied with applicable data protection laws.

12. EFFECT OF NOTICE AND CHANGES TO NOTICE

- 12.1 This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
- 12.2 We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

ACKNOWLEDGMENT AND CONSENT

I acknowledge that I have read and understood the above Data Protection Notice, which is applicable to all of Grindrod Shipping's divisions and subsidiaries, and consent to the collection, use and disclosure of my personal data by _____ (Name of Grindrod Shipping's entity) for the purposes set out in the Notice.

Please tick the relevant boxes below if you agree to receive the following marketing materials:

- I do not wish to receive any marketing information.
- I would like to receive information about services which may be provided by Grindrod Shipping, via the following channels:
 - Email;
 - Text message;
 - Telephone call.

Name : _____

Signature : _____

Date : _____