

# PRIVACY AND COOKIES

## 1. Who is responsible for your data

Our Privacy Policy applies to the personal data that HBB Hanseatic Break Bulk GmbH collects and uses.

References in this Privacy Policy to “HBB”, “we”, “us” or “our” mean HBB Hanseatic Break Bulk GmbH (registered in Germany with registration no HRB133442 and registered office at Elbberg 6b, 22767 Hamburg, Germany).

HBB controls how your personal data is collected and the purposes for which we use your personal data. HBB is the “data controller” for the purposes of the Regulation (EU) 2016/679 of 27 April 2016 (the GDPR) when the regulation comes into effect.

## 2. Personal data we collect about you

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data includes, for example, your name, your contact details or information on how you use our website, or data from when you interact with us.

We collect some personal data from you, for example when you use our website, use our services or simply contact us. We may also receive your personal data from our suppliers who provide services to you on our behalf (for example when you provide feedback on our services).

For more information on the parties who may share your personal data with us, please see section below.

### Categories of data

We may collect and process the following categories of information about you:

<b>Categories of personal data processed</b>	<b>When do we process the personal data mentioned?</b>	<b>Which legal basis do we rely on for processing your personal data?</b>
Your name and surname and your contact details (email address, job title, telephone number and postal address)	When you interact with one of our staff	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Information about your course or event bookings, if you require special assistance or if you have specific dietary requirements.	When you book or manage your participation	

<p>Your communications with us (for example, your emails, letters, telephone calls, or your messages on our online chat service)</p>	<p>When you contact HBB or you are contacted by HBB</p>	<p>We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.</p>
<p>Pictures or videos taken at HBB events, which may include you.</p>	<p>When you participate in a HBB event</p>	<p>We will base the processing on consent, which we will ask you to provide if relevant.</p> <p>In certain circumstances, we may however base the processing on our legitimate interest, if the pictures or videos are of a situational character and does not specifically depict you.</p>
<p>Your posts and messages on social media directed to HBB</p>	<p>When you interact with us on social media</p>	<p>We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.</p> <p>We ask that you do not disclose sensitive information such as health information in messages on our social media platforms. If you do so anyhow, we reserve the right to delete such information from our platform, unless we have a legal basis such as your consent to process the information.</p>
<p>Your feedback</p>	<p>When you reply to our requests for feedback or participate in our customer surveys</p>	<p>We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.</p>
<p>Information about how you use our websites, from where you access it and what system you use when accessing it</p>	<p>When you navigate to and on our websites</p>	<p>We process this information based on your consent, which we ask you to provide when entering our websites.</p>

## Sensitive personal data

In the course of providing services to you we do not collect sensitive data, unless you have provided us with information on your need for special assistance or dietary requirements and such information reveals health information about you. In such case, we will seek your consent before we process any such information electronically.

## 3. How and why we use your personal data

We use your personal data for the following purposes:

- **To provide professional services to you**  
When you ask for advice, participate in our events or when you use our website or services, we use your information to perform our services in relation to you or those products. For example, to answer an enquiry, to issue an invoice, to determine who created a contract or to issue an exam certificate.
- **To communicate with you and manage our relationship with you**  
Occasionally we may need to contact you by email or phone for administrative or operational reasons, for example in order to send you information related to your membership of the organisation, invoices, confirmation of bookings and payments, or to notify you of disruptions to online services.

Please be aware that these communications are not made for marketing purposes and, as such, you will continue to receive them even if you opt-out of receiving marketing communications from HBB.

We will also use your personal data if we contact you after you have sent us a request, filled in a web-form through our website or contacted us on social media.

Your opinion is very important to us, so we may send you an email to seek your feedback.

We will use your communications with us and the feedback you may provide in order to manage our relationship with you as member or customer and to improve our services and experiences for members and customers.

- **To personalise and improve your customer experience**  
We may use your personal data in order to tailor our services to your needs and preferences to provide you with a personalised customer experience. For example, if you inform us about your role in shipping and have consented to receive marketing communications we will be able to send you offers relevant to your part of the business.

We may also collect information on how you use our website, which pages of our website you visit most, which contracts you use and what products you buy, in order to understand what you like.

We may use this information to tailor the content and offers that you see on our website and, if you have agreed to receive marketing communications, to send you relevant messages that we think you may like.

- **To inform you about our news and offers that you may like**  
If you have given us your consent to receive marketing material, we may send you marketing communications, for example when you create an account on our website or show interest in a product or have been in dialogue with us.

You can request us to send you news and marketing communications by managing your preferences in your account.

If you are happy to receive marketing communications, we will provide you with news from us such as new services or events.

Please note that we do not share your contact details or other personal data with other companies for marketing purposes, unless we have first obtained your written consent to do so.

If you do not want to receive marketing communications from us, you can simply tell us so by clicking the relevant box on our website <https://www.bimco.org/>.

You can also choose to opt out from receiving marketing communications at any time, by clicking on the relevant unsubscribe link at the bottom of any marketing related email you may receive from us.

- **To improve our services, fulfil our administrative purposes and protect our business interests**

The business purposes for which we will use your information include, but are not limited to, accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development of our products and services.

#### 4. Your rights

You have certain legal rights under EU data protection legislation, which you can enforce against HBB. Set forth below is a summary of these rights. For complete information regarding your rights, please see the General Data Protection Regulation (Regulation (EU) 2016/679), sections 3–5.

- **Right of access.** You are entitled to be informed as to whether HBB is processing personal data about you. If we are, you are entitled to information regarding, among other things, which personal data we are processing, the purposes of the processing, which external recipients have access to your personal data, and how long we save your personal data.
- **Right to data portability.** You have a right to receive a copy of the personal data, which you have provided to HBB, in a structured, commonly used, and machine-readable format. You also have the right to require that HBB transfers this personal data to another controller of personal data. The right to data portability applies to personal data which is processed in an automated manner and which is based on your consent or on an agreement to which you are a party.
- **Correction of erroneous data.** You have a right to require that HBB corrects erroneous or incomplete information about you.
- **Deletion of certain data.** You have a right to require HBB to delete your personal data under certain circumstances, for example where the personal data is no longer necessary for the purpose for which we collected it.
- **Right to object to HBB's processing of personal data.** You have the right, under certain circumstances, to object to HBB's processing of your personal data.
- **Right to object to direct marketing.** You have the right at any time to object to HBB processing your personal data for direct marketing purposes. If you object to such processing, HBB must discontinue all direct marketing to you without undue delay.
- **Right to restrict the processing of your personal data.** You have the right to require HBB to restrict its processing of your personal data in certain circumstances. For example, if you have denied that your personal data is correct, you can request a restriction on the processing during a period of time which allows HBB to verify whether the personal data is correct.

- **Right to withdraw consent.** If our processing is based on your consent, you have the right to withdraw your consent to our processing of your personal data at any time. Such withdrawal does not affect the lawfulness of our processing based on your consent before its withdrawal.
- **Complaints.** If you have any complaints regarding the HBB's processing of your personal data, you are entitled to file such complaints with the Data Protection Authorities.

If you have questions in relation to your personal data or would like to submit a request for an extract from the register, data portability, correction, deletion, objection, restriction or withdrawal of consent, please contact us at: [hbb@hanseatic-breakbulk.com](mailto:hbb@hanseatic-breakbulk.com)

## 5. Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data that we process about you. When you provide your personal data through our website or online services, this information is transmitted across the Internet securely using high-grade encryption.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. If HBB discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

The information that you provide to us will be held on hosted systems not owned by us, which are located in premises of an appointed third party within the EU. We may also allow access to your information by our subcontractors who act as data processors on our behalf for the purposes described in this Privacy Policy or for other purposes approved by you.

## 6. For how long we process your personal data

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Policy.

We may also save your personal data for a longer period of time where necessary in order to fulfil a legal obligation which requires processing by law or in order for us to be able to establish, enforce, or defend against legal claims.

## 7. Cookies or other tracking technologies

In order to improve our services and to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies, Vertical Response, Sitecore EXM, Microsoft Security Graph or tracking software. A cookie is a small text file, which is stored on your computer in order to recognize your computer at recurring visits. A cookie cannot retrieve information from your computer and cannot carry any virus or other damaging files.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website to enhance your experience when visiting our website. In addition, to understand how members and customers interact with the emails and the content that we send, we use Vertical Response or Sitecore EXM which tells us if the emails we send are opened or if links are followed.

The cookies and tracking technologies used on HBB's websites are placed by HBB itself and will not be disclosed to third parties.

HBB's website only uses cookies for the purpose of enabling auto-login to our website. The information is encrypted and does not contain any personal information. It is mandatory to use cookies in order to auto-login, but voluntary whether you want to enable this feature or not. We rely on your consent for placing cookies on your computer, which you provide by clicking the "I agree to HBB's cookie policy" tic box when you login to our website.

Insofar as the tracking technologies that we use collect personal data such as your IP-address, we rely on our legitimate interest as the legal basis for such processing. The legitimate interests we pursue in this regard is to help us understand how users of our website navigate on our site in order to develop the design and layout and enhance the user experience for visitors of the website.

You can at any time remove the cookie created via HBB's website. To remove, follow your browser's guide to disable or delete cookies. Session cookies only live for the duration of your session.

## 8. Sharing your personal data

Your personal data may be shared within HBB.

We may also share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- Suppliers providing services to us in order to help us run our business. If applicable, we share the minimum personal data required with the companies mentioned below who assist us running the services that we provide to you. These recipients are only entitled to process your personal data on behalf of HBB while performing a service for HBB.

HBB takes all reasonable legal, technical and organizational measures in order to ensure that your data is handled securely and with an adequate level of protection when transferring to, or sharing with, such selected third parties.

- The personal data that we transfer to suppliers varies depending on the kind of product or service we deliver to you as specified in the brackets. In most instances suppliers will have their own set of Terms of Use detailing the types of personal data stored by the supplier in the respective system. Those suppliers who do not have their own Terms of Use will be limited to processing the following types of information:
  - Your name and contact details
  - Course or event bookings
  - Need for special assistance
  - Dietary requirements

HBB has entered into written data processing agreements with all of the above mentioned suppliers, in order to protect your personal data. To the extent your data is transferred to a country outside the EU/EEA, such transfer will be based on the Commissions Standard Contractual Clauses, 2010/87/EU.

- Authorities. We may disclose your personal data when this is required by the law of any jurisdiction to which we may be subject unless this is expressly prohibited by EU Member State law or the law of an EU country to which HBB is subject.

## 9. Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time, including as part of the new European data protection legislation which will start to apply on 25 May 2018 (the "General Data Protection Regulation") - we will update this Privacy Policy and publish any new edition on our website.

## 10. Contact information

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [hbb@hanseatic-breakbulk.com](mailto:hbb@hanseatic-breakbulk.com)