

## **PERSONAL DATA PROTECTION POLICY**

### **Purpose**

The purpose of this Policy is to describe how 30 50 Ventures Pte Ltd processes your personal data and the rights you have in relation to your personal data.

### **1. Introduction**

30 50 Ventures Pte Ltd recognises the importance of data protection and is committed to protecting your privacy. The purpose of this Policy is to describe the type of personal data that 30 50 Ventures Pte Ltd and/or its majority-owned subsidiaries (collectively, "30 50 Ventures") may collect about and/or receive from you, how it will be processed, and the rights you have and control you can exercise in relation to such information.

### **2. What is personal data?**

Personal data is any information relating to a natural person who can be identified by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. For example, personal data includes but is not limited to your contact information.

### **3. Whose personal data do we collect?**

In general, the types of personal data that 30 50 Ventures collects from you will depend on the nature of your relationship with 30 50 Ventures. 30 50 Ventures collects personal data from a range of persons in the context of its business activities, including but not limited to the following:

- suppliers, customers, and other business contacts;
- representatives of suppliers, customers, and other business contacts;
- employees, seafarers, and job applicants;
- contractors, consultants, and advisors;
- users of our websites; and
- individuals who contact us by any means.

### **4. How do we collect your personal data?**

We collect personal data from you through the following means:

- when you visit our websites and/or complete one of our web forms, including through the use of cookies;
- when you visit our premises and/or vessels;
- when you communicate with us via any means, including but not limited to telephone, video conferencing, email, and through the use of social networking websites, third-party apps, or similar technologies;

- when others communicate with us about you, including but not limited to affiliate companies, business partners, or other third parties (such as authorities, insurance companies, and public databases).

Other types of information may be collected automatically from your device as you interact with our websites. We collect this personal data by using cookies and other similar technologies. We may also collect information from third-party sources – for example, relating to your use of other websites which we operate and from related third parties, e.g., sub-contractors.

## 5. What personal data do we collect?

Through our websites, online systems, and business interactions, we may collect the following personal data from you:

- Contact information:** your name, position, role, company or organisation, telephone number, mobile number, email address, postal address, and other personal and business contact information;
- Employment information:** data identifying you in connection with matters related to your employment and/or potential employment with or engagement by 30 50 Ventures, including education and qualifications, employment history, external organisation appointments, emergency and next-of-kin contact information, and family and beneficiary insurance planning information;
- Business information:** data identifying you in relation to business matters in which you and/or your company or organisation are involved with 30 50 Ventures;
- Your logon ID and password:** for access to 30 50 Ventures' intranets and other services or platforms;
- Information from public sources:** for example, LinkedIn and similar professional networks, directories, or internet publications;
- Social media:** any posts and/or other interactions with our social media presence, including on LinkedIn and Workplace;
- Attendance records:** to record your attendance at our offices, on board any vessels, and/or on visits with any existing or potential business partners for security and business-related purposes;
- Subscriptions/preferences:** when you subscribe to receive briefings, updates, corporate publications, or newsletters, as well as consent preferences to help us identify which materials you are interested in receiving;
- Events data:** attendance at and provision of feedback forms in relation to any events run by us or which we attend;
- Supplier data:** contact details and other information about you and/or your company or organisation where you provide products and/or services to 30 50 Ventures;
- Technical information:** information obtained when you access our website and technology services, including IP address, browser and operating system details, device type, hardware model, MAC address, unique identifiers, and mobile network information;

- l. Online data:** information obtained when you access our website and technology services, including URL clickstream to, through, and from our website (including date and time), network information, pages viewed or searched for, response times, download errors, length of visits, interaction information (such as scrolling, clicks, mouse-overs), and whether you click on particular links or open our emails;
- m. Other information:** any other information that you choose to provide in communications with us in connection with or related to our business interactions.

The above data will be provided to us by you, your employer, the company or organisation who is our client, service provider, or supplier, as well as any screening providers who assist us with our legal obligations to conduct anti-money laundering, sanctions screening, and regulatory checks.

## 6. What do we use your personal data for?

We use your personal data for the following purposes:

- **Employees and seafarers:** to manage and administer all matters related to your employment and/or potential employment with or engagement by 30 50 Ventures, including visa requirements, insurance coverage, training, awards, compensation (including mandatory contributions), government relief/grants, and medical records;
- **Provision of services and products:** to provide products and business-related services and otherwise for the purposes of performing and managing our contracts efficiently;
- **Business relationship:** to manage and administer our relationship with you and/or your company or organisation, including keeping records about business contacts, services, and payments;
- **Communication:** to send emails, newsletters, corporate publications, and other messages that keep you informed about 30 50 Ventures;
- **Events:** to run and/or participate in events;
- **Surveys and feedback:** to solicit feedback from our business partners and in respect of events we participate in, as well as addressing any issues and concerns which may arise;
- **Legal compliance:** to verify your identity and undertake due diligence (under anti-money laundering, sanctions screening, and other crime prevention and detection laws and regulatory requirements);
- **Website monitoring:** to check our website and other technology services are being used appropriately;
- **Site security:** to provide security to our vessels, project sites, offices, and other premises;
- **Online security:** to protect our information assets and technology platforms from unauthorized access or usage and to monitor for malware and other security threats;
- **Regulatory:** to comply with industry-specific legal and regulatory obligations, including auditing and reporting requirements;
- **Business Partners:** to manage relationships with our business partners, including suppliers who deliver products and services to us;

- **Legitimate interest:** to pursue the legitimate business interests listed in Section 8 (What are legitimate interests?) of this Policy below.

## 7. On what basis can we use your personal data?

We may process your personal data for a number of reasons:

- **Where you have given us consent:** for example, where you share details for particular purposes.
- **Where it is necessary to comply with legal or regulatory obligations:** for example, anti-money laundering, sanctions screening, regulatory requirements, or disclosure to law enforcement.
- **Where processing is necessary for our legitimate business interests:** provided this does not override any interests or rights that you have as an individual.

## 8. What are our Legitimate interests?

We have legitimate business interests in:

- providing business-related services;
- managing our business and relationship with you and/or your company or organisation;
- understanding and responding to inquiries and feedback from our business partners;
- improving our products, services, and offerings;
- enforcing the terms of our contractual agreements;
- developing relationships with business partners and customers;
- ensuring debts are paid; and
- sharing data in connection with acquisitions and transfers of our business.

## 9. Special category data and Our reasons for using it

During the course of our relationship with you, we may need to collect and process certain sensitive personal data. Sensitive personal data may include:

- racial or ethnic origins;
- religious beliefs;
- health-related data;
- biometric data;
- data concerning a person's sex life or sexual orientation;
- personal data relating to criminal convictions and offences;
- personal data relating to your children.

We will only process sensitive personal data where:

- we have your explicit consent;
- you have made the data public;
- it is necessary to protect your vital interests or those of another person;

- it is necessary for legal claims;
- it is necessary for substantial public interest; and
- as permitted by applicable law.

## 10. Who do we share your data with?

We share your information with others as follows:

- **30 50 Ventures Pte Ltd.'s affiliates and subsidiaries:** including their directors, management, employees, seafarers and contractors in order to provide our products and services;
- **Suppliers and business partners:** who support our business, including outsourced business, project and vessel support, agents, contractors, consultants, professional advisers, insurance providers, IT and communication suppliers, human resources, manning agents, recruitment and development support services, marketing and advertising agencies, travel agencies, data back-up suppliers and operations. Our suppliers and business partners have to meet minimum standards as to information security, and they will only be provided data in line with their function;
- **Shared service centres:** operated by 30 50 Ventures Pte Ltd. or third parties, including for supplier onboarding, insurance, communications, marketing and advertising services, human resources, recruitment and manning services, IT services, corporate secretarial and legal services, risk management and office support services;
- **Law enforcement bodies and our regulators:** or other competent authorities in accordance with legal requirements or good practice;
- **Appropriate parties in the event of emergencies:** to respond to an emergency; to protect the rights, property, security, health or safety of 30 50 Ventures Pte Ltd., our customers, employees or seafarers, users of our services or others or other third parties; or when we believe disclosure is necessary or appropriate to prevent physical harm, vessel/installation loss or financial loss;
- **Investigations:** in connection with an investigation of suspected or actual illegal activity; at the request of governmental authorities or shipping/port authorities conducting an investigation; or to verify compliance with, or enforce, our company policies or guidelines or a breach of any contractual arrangements;
- **Your company or organisation:** in relation to us providing our services;
- **Screening service providers:** so that we can comply with legal obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks;
- **Third parties:** in the context of the acquisition or transfer of any asset, part of our business or in connection with the business reorganisation; and
- **Other delegates:** where your name will appear on the attendee list for events where you have told us you plan to attend.

## 11. Personal data about others

In some cases, you may provide personal data to us about other people (such as your customers, suppliers, contractors, directors, officers, employees, shareholders or beneficial owners). You must ensure that you have given those individuals an appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

## 12. Security

In proportion to the sensitivity of your personal data, we maintain reasonable technical, administrative and/or physical safeguards and appropriate security measures to protect your personal data from loss, misuse or unauthorised access, disclosure, alteration or destruction. However, the electronic transmission or storage of information is not completely secure. As a result, we cannot guarantee the security of your personal data and any transmission is at your own risk. If an incident is reported affecting your personal data, we will investigate and comply with all required reporting obligations.

## 13. Where will your information be held?

We may share your information among 30 50 Ventures Pte Ltd., our service providers and business partners and other third parties that may be located in countries outside your local jurisdiction or region.

Data protection laws vary by country and those applicable in the United States of America and elsewhere are not equivalent to those applicable in, for example, Singapore, the European Union or certain other jurisdictions. 30 50 Ventures Pte Ltd. will take appropriate measures to handle your information as described in this Policy and in accordance with locally applicable data protection requirements. Please contact us if you would like to understand these steps in greater detail.

## 14. How long do we keep your data?

We generally keep your personal information for as long as it is needed for the purposes for which it is collected. This will depend on a number of factors, such as whether you and/or your company or organisation are an existing business partner. We will also retain your information as necessary to comply with legal, accounting or regulatory requirements. The amount of time records are kept depends on the type of personal data they contain.

## 15. What are Your Rights?

If you are working with one of our EU entities or our entities in certain other jurisdictions where similar rules apply, you have certain rights in relation to your information. The availability of these rights and the ways in which you can use them are set out below in more detail.

Some of these rights will only apply in certain circumstances. If you would like to exercise or discuss any of these rights, please contact us in accordance with Section 21 (How to contact us) of this Policy.

- **Access:** you are entitled to ask us if we are processing your data; and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it.
- **Transfer:** you may ask us to help you request the transfer of certain personal data to another party.
- **Correction:** you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected.
- **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for

erasure, for example, where the personal data is required for compliance with law or in connection with claims.

- **Restriction:** you are entitled to restrict us from processing certain of your personal data in certain circumstances, for example, if you want us to establish its accuracy or the reason for processing it.
- **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party), you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal information for direct marketing purposes, for example, to send you information about 30 50 Ventures Pte Ltd.
- **Automated decisions:** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- **Consent:** where we are processing personal data based on your consent, you can withdraw your consent.

If you want to exercise any of these rights, please contact us in accordance with Section 21 (How to contact us) of this Policy.

You also have a right to lodge a complaint with a data protection supervisory authority, in particular in the jurisdiction where you are habitually resident, where we are based or where an alleged infringement of Data Protection law has taken place. In Singapore, you can make a complaint to the Personal Data Protection Commission (Tel: +65 6377 3131 or at [www.pdpc.gov.sg](http://www.pdpc.gov.sg)).

## 16. Direct Marketing

As described above, you can opt-out of receiving information about 30 50 Ventures Pte Ltd. from us at any time.

We may use the information you give us on our website or other means for direct marketing purposes to provide emails, newsletters, corporate publications and other messages to keep you informed about 30 50 Ventures Pte Ltd., including events that we think may interest you.

You can opt-out of receiving information about 30 50 Ventures Pte Ltd. from us at any time. You can do this by clicking on the "unsubscribe" link included at the end of any applicable email correspondence sent to you or by contacting us in accordance with Section 21 (How to contact us) of this Policy.

## 17. Cookies

Our websites use cookies that identify your browser. They collect and store certain information when you visit our website. For more information about the use of cookies, see [here](#).

## 18. Links to third party websites

From time to time, our website, newsletters and published reports, social media publications and other communications may contain links to and from websites owned or maintained by other parties. Please note that any personal data that you provide through

these websites is not subject to this Policy and the treatment of your personal data by such websites is not our responsibility.

If you follow a link to any other websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites.

### **19. Children**

We do not knowingly collect information from children or other persons who are under 16 years old. If you are under 16 years old or are disclosing information about a person who is under 16 years old, you may not submit any personal data about yourself or such person to us without our prior written consent.

### **20. Changes to this Notice**

We reserve the right, in our sole discretion, to amend and/or delete in whole or in part this Policy at any time, without providing prior notice to you. The most current version of this Policy will be posted on our website.

### **21. How to contact us**

By submitting your personal data, you agree to 30 50 Ventures Pte Ltd. processing your personal data in accordance with the terms of this Policy.

If you have any questions about this Policy or would like more information about the way we manage your personal data, please contact our data protection team by emailing [info@studio3050.io](mailto:info@studio3050.io) or contacting our office.