

PRIVACY NOTICE

HOW WE USE YOUR DATA

DATA CONTROLLER

We are CKB Fleet List Pte. Ltd., a company registered in Singapore with UEN 201939128E whose registered office is at 71A Peck Seah Street, Postal 079329 ('CKB' 'us' 'we' etc).

CKB ('we' or 'us' etc), is a 'controller' of data. This means that, under the UK General Data Protection Regulation (**GDPR**) and the Data Protection Act 2018 (**DPA**), we may control and process your personal data in connection with any personal information collected or received by us arising from your use of any of our services, applications, websites and customer support communications.

INTRODUCTION

The GDPR and the DPA govern the controlling and processing (or the use or holding) of personal data. Personal data is essentially any information about specific identifiable living individuals. The GDPR and the DPA also give those specific individuals certain rights and remedies in respect of that information.

The purpose of this notice is to supply you with the required information at the time of providing us with your personal data. This notice sets out the essentials in relation to personal information collected by CKB, and aims to help your confidence regarding the privacy and the security of your personal information.

PLEASE READ THIS PRIVACY NOTICE CAREFULLY. BY VISITING OUR WEBSITE OR USING ANY OF OUR SERVICES, YOU INDICATE YOUR AGREEMENT TO OUR USE OF YOUR PERSONAL INFORMATION AS SET OUT IN THIS PRIVACY NOTICE.

CHANGES TO THIS NOTICE

We reserve the right to make changes to this notice (and our policy on data protection) at any time and we may notify you of changes to this notice by posting an updated version of this notice on our website. Your continued use of our applications, services and websites that are subject to this notice will signify your acceptance of any and all changes to this notice made by us from time to time and you should check this page occasionally to ensure you are happy with any changes to this notice.

KEEPING US INFORMED

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

PERSONAL DATA WE MAY COLLECT ABOUT YOU

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed ('anonymous data').

As the 'controller' of personal information, we are responsible for how that data is managed. The GDPR and the DPA set out our obligations to you and your rights in respect of how we manage your personal information.

As the 'controller' of your personal information, we will ensure that the personal information we hold about you is:

1. used lawfully, fairly and in a transparent way.
2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. relevant to the purposes we have told you about and limited only to those purposes.
4. accurate and kept up to date.
5. kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

Information collected by us:

We may collect, use, store and transfer information about you in several different ways and this information may be classified in different categories. Please take care when submitting information to us. Only provide us with information that you are happy for us to process in accordance with this notice, particularly with regard to confidential or sensitive information.

In the course of providing our services, the following types of data may be collected from you:

Contact and Identification Data: includes your name, address and contact details (including email address and telephone number), position within your organisation, gender (for the purposes of addressing you correctly), preferred pronouns and nationality

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data includes information about how you use our website and services, as well as the frequency and pattern of your service use.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Location Data: includes your country of residence and the country from which you are accessing our services

Sources of Data:

We may collect personal data about you when you make an enquiry with us; apply for a job; interact with our personnel; visit or use our website or services; give us feedback; or complete a form and submit it to us.

We may collect data about you from third parties and publicly available sources. For example, we may collect personal information from:

- from analytics providers or search information providers
- providers of technical, legal, accountancy, payment and delivery services and other specialist agencies

- social media if you (i) interact with any of our social network pages or applications; or (ii) you use one of our services that allow interaction with social networks, we may receive information relating to your social network accounts

REASONS WE COLLECT AND USE YOUR PERSONAL INFORMATION

When we process your personal information, for whatever reason, we rely on one or more of the following grounds within the GDPR, depending on the reason why we are processing the information:

- Article 6(1)(a) – processing is conducted with your **consent** to process personal data for specified purposes (**Consent**)
- Article 6(1)(b) - 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 into a contract (**Contract**)
- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with our **regulatory framework** and the law (**Compliance**)
- Article 6(1)(f) – to process your personal data in pursuit of **legitimate interests (Legitimate Interests)**

We will only use your personal data to the extent permitted by the law. Braemar needs to process data for a variety of reasons, including in order to enter into contractual relationships and to meet its obligations under any such contracts. In general, the reasons why we might process your personal information are as follows:

Reason for Using Data	Type of Data	Legal Basis
To communicate with you (You acknowledge that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages)	Contact and Identification	Consent, Contract, Compliance or Legitimate Interests
To manage our contractual relationship with you and to enable you to access and use our services	Contact and Identification, Technical, Location	Contract
To monitor compliance with our terms of use and other legal	Contact and Identification, Technical, Location	

obligations; to enforce our terms of use against you or a third party		
Improvement of our services	All data	Legitimate Interests
For identification, verification, due diligence, or know your customer purposes, including for complying with anti-money laundering and bribery laws	Contact and Identification, Technical, Usage, Location	Compliance, Legitimate Interests
To advise you of opportunities and advertising, including market research	Contact and Identification	Consent
To detect, prosecute and prevent fraud and other crime	All data	Compliance, legitimate interests
To respond to legal processes or to comply with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction or where we have a good faith belief that such disclosure is necessary, including, without limitation, meeting the requirements to make disclosure under the requirements of any law binding on CKB or on its related corporations or affiliates	Contact and Identification, Technical, Usage, Location	Compliance, legitimate interests
To assess and manage any potential risks to the proper running of our work	All data	Legitimate Interests
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Technical, Usage, Location	Legitimate Interests
To use data analytics to improve and enhance our service	Technical, Usage, Location	Legitimate Interests

To create and manage our marketing database	Contact and Identification, Marketing and Communications	Consent, Legitimate Interests

MARKETING AND OPTING OUT

We will not contact you for the purposes of direct marketing unless you have asked us to do so. However, if you have asked us to do so and later you change your mind, you can opt-out at any time with no hassle. To do this, just let us know. See further '**Your rights**' below for details about how to contact us.

WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. We may have to share your personal data with the third parties set out below:

Third Party Service Providers working on our behalf: We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Our website provider: to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us.

Our professional advisors and agents for the purposes of advising and representing us in any matter connected with your account or your use of our website upon which we legitimately consider that advice or representation is needed. This may include managing risks, obtaining advice and representation, or services connected with legal proceedings.

Our Group Companies: this includes any company that is part of the CKB network or the SPI Marine group

Prospective buyers: If we merge with or are acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

THIRD PARTY LIABILITY

We are not liable for the actions and inactions of these third parties, and it is a condition of your use of our website that you agree to the [Website Terms](#), which limit and restrict our liability in certain defined circumstances. In particular, you agree that when third parties are the controller of data (such as third party suppliers of goods and services), then they are responsible for keeping your data safe once you have provided data to them. We have no control or responsibility over this.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control

these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

KEEPING YOUR DATA SECURE

Whilst we cannot guarantee that unauthorised access to your data will never occur, we will use reasonable technical and organisational measures to safeguard your personal data, for example:

- Access to our systems is controlled by password and username which are unique to the user;
- We store your electronic personal data on secure servers;
- We store your paper records in locked fire-proof storage rooms;
- Payment details are encrypted;
- We always limit access to data about you (for example, data is shared with staff on a need-to-know basis only);
- We vet third party suppliers where they supply services to us that might involve processing your data to ensure that they also have proper technical and organisational measures to safeguard your personal data;
- Where necessary, we enter into professionally drafted data sharing and data processing agreements with third parties that focus on safeguarding personal data and comply with the GDPR;
- We take advice from experts on the GDPR and the DPA where we need it;
- We train our staff in data protection and awareness and we have policies and procedures in place for dealing with the unlikely event of data breaches

We advise you to take great care over your personal data. Do not provide personal information about yourself or anybody else unless you are satisfied you are taking proper precautions first.

Non-sensitive details (your contact details and preferences for example) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

We may share your personal information with our service providers, and this may involve transferring it to countries outside the European Economic Area (EEA) whose data protection laws may not be as extensive as is required under the GDPR or the DPA. Where we do so, we will ensure that we do this in accordance with the GDPR and the DPA and use reasonable endeavours to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies within the EEA (but this cannot be guaranteed). Such measures may include only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission.

We may transfer your personal information between businesses that are legally part of the CKB / SPI group of companies for the purposes of providing our services to you as follows:

- from our businesses based in the United Kingdom to our businesses based in countries where the European Commission has made a formal decision that such countries provide an adequate level of data protection similar to that which applies in the United Kingdom and EEA; and
- from our businesses based in countries other than the United Kingdom to our businesses based in the United Kingdom on the basis that the United Kingdom is an authorised jurisdiction for the purposes of the GDPR, or elsewhere within the world.

HOW LONG DO WE KEEP YOUR DATA FOR?

As a general rule, we will not keep your data for any longer than is necessary to complete tasks or provide you with services. Usually, this is generally up to seven years, although general enquiry data is usually kept for a maximum of two years.

We retain copies of our customer contracts in order to enable us to deal with any legal issues in addition to the information provided to us for identification verification checks, financial crime and anti-money laundering checks (as required by law) for at least 5 years after termination or expiry of our contract with you. We retain details of complaints for 5 years from the date of receipt.

You also have the right to ask us to delete your data (sometimes known as '*the right to be forgotten*').

COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. If you use our website, we may use cookies to:

- Track your use of the site;
- Recognise you whenever you visit this website (this speeds up your access to the site as you do not have to log on each time);
- Obtain information about your preferences, online movements and use of the internet;
- Carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor/customer requirements and interests
- Target our marketing and advertising campaigns more effectively
- Make your online experience more efficient and enjoyable

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to the use of cookies. This includes cookies that are essential in order to enable you to move around the site and use its features and cookies that are not essential but gather information about your use of the site.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by the UK Government and leading UK businesses.

For more information, please see our separate [Cookie Policy](#).

YOUR RIGHTS

If you are a resident of the EU, UK or Switzerland, you have various rights under the GDPR, including the following rights:

- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, providing you with services), or consent to market to you, you may withdraw your consent at any time.
- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below.

To exercise any of your rights concerning your information, please send an email to the following address: admin@ckbfleet.com

Or write to us at the following postal address: 71A Peck Seah Street, Postal 079329

We may ask you to provide us with proof of your identity. Please do not be offended; this may occur even if we know you. It is a requirement of the GDPR in some cases.

If you are not a resident of the EU, UK or Switzerland, then you may have different rights to those set out above. In particular, your rights may not be as extensive, but – where this is the case – we will use reasonable endeavours to accommodate any request to exercise your rights as if you were a resident of the EU, UK or Switzerland, although you will not be able to enforce those rights through the ICO.

There may be a supervisory body in your country of residence. If so, you should seek advice about your rights from that body.

REVIEW

This Policy was last reviewed in April 2023.

THE INFORMATION COMMISSIONER'S OFFICE

More information about privacy laws can be found at www.ico.org.uk

Details of the UK supervisory authority: The Information Commissioner's Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: casework@ico.org.uk
- [Live chat](#), via the ICO website
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF