

Privacy Policy

This Privacy Policy explains how Globicon Terminals and its affiliated companies the legal rights that you have in relation to our collection and processing of your Personal Data.

This Privacy Policy may be updated regularly. Therefore, you are recommended to refer to this Privacy Policy for any changes and updates in the purposes of the processing.

Protecting your Personal Data. Protecting the Personal Data of individuals that we interact with throughout our activity, with conscious respect for the legal relevant requirements, is a commitment and a responsibility of high value and importance for us. When engaging with Globicon Terminals we want you to feel secure and confident that your Personal Data are in good hands.

Data Subjects from whom we collect and process Personal Data. We collect Personal Data of our employees, potential employees (i.e. job candidates, job applicants), clients, suppliers, client's and supplier's representatives also referred as "business contacts", shareholders and website users. If the Personal Data we collect are not listed in this Privacy Policy, we will give individuals, when required by law, appropriate notice of which other Personal Data will be collected and how they will be used.

Categories of Personal Data that we collect and process. We may collect and process the following categories of Personal Data about you:

- Contact data and Business Contact Information: name, company details, postal address, email address, other contact information, including your business contact information and your business bank account and any data that would enable us to maintain our business relationship with you;
- Targeted data: age, interests, any postings, comments or other content that you upload or post on our websites and/or webpages, movements and behaviour on our webpages, websites and online systems;
- Automatically collected data: IP addresses, information about your browser, operating system and other Personal Data that are relevant and necessary for the use of the service;
- Biometric data: photographs, and images/footage captured on CCTV or other video systems when you access our premises, locations and/or offices, voice recordings for when you register to a conference;
- Cookies and Tracking Technologies, please refer to paragraph below.

If you contact us, we may keep a record of the correspondence. Furthermore, we may ask you to complete surveys that we use for research purposes, although you are not obliged to respond to them.

Although we do not generally seek to collect sensitive or special categories of Personal Data about you, we may do so in certain cases where we have the legal right to do so, or where you have expressly consented to this.

If you provide us with any Personal Data of another person, you are responsible for ensuring that such person is made aware of the information contained in this Privacy Policy and that the person has given you his/her consent for sharing the information with us.

Except for certain information that is required by law, your decision to provide any Personal Data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your Personal Data. However, please note that if you do not provide certain information, we may not be able to accomplish some or all the purposes outlined in this Privacy Policy, and you may not be able to use certain tools and systems which require the use of such Personal Data.

The processing activity. Through our webpages and websites, we collect and process Personal Data about you in two ways:

- (1) **direct processing** (for example, when you provide your Personal Data through a log in action on our webpages and websites or when you are prompted to complete a form within our webpages and our websites or when you provide information to sign up for a newsletter or register to comment on a forum webpage or website), and;
- (2) **indirect processing**, from certain third parties (for example through website analytic technology). Such third parties include for example our affiliates, public authorities, public websites and social media, suppliers and vendors, etc.

Direct processing. Our websites and webpages may collect certain information automatically, such as the type of PC device or operating system you use, the amount of time you spend on our websites and webpages, and information about the way you use our websites and webpages. Our websites and webpages may also use

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certain analytics software that enables us to better understand how our website and webpages functionalities work so that we can continue to improve them. Our websites and webpages do not knowingly collect Personal Data about any person. You can stop continued collection of information by our websites easily by stop using our website. However, please note that we will retain any previous usage information collected from the website according with the retention section of this Privacy Policy.

Targeted data and marketing communications. The majority of the Personal Data we collect and use for marketing purposes relates to individual employees of our customers and/or vendors and other companies with which we have an existing business relationship. We may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a customer, vendor or other company.

We send commercial e-mails to individuals at our customers, vendors or other companies with whom we want to develop or maintain a business relationship in accordance with applicable marketing laws. Our targeted e-mail messages typically include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click. When you click a link in a marketing e-mail you receive from Globicon Terminals, we may also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

Targeted e-mails from us may include additional data privacy information, as required by applicable laws.

You can exercise the right to discontinue marketing communications to you at any time by contacting us at info@ictpl.net. In such cases, we will retain minimum Personal Data to note that you opted out in order to avoid contacting you again.

Indirect processing. Our websites may include links to and from the sites of our partner networks, advertisers and affiliates and certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your Personal Data collected through such programs for their own purposes. We do not accept any responsibility or liability for such third parties' sites or programs. Please check such third parties' terms of use and Privacy Policy before using and providing any information to such third parties' sites and programs.

Purposes for collecting and processing your Personal Data. We might process your Personal Data for the below listed purposes:

- Recruitment, for ensuring that we recruit the appropriate employees;
- To facilitate, among others, communication in regard to general meetings, the management of the shareholders register, access to the shareholder portal, communication with shareholders and other investor relation activities. For access management purposes, to ensure that both Globicon Terminals and yourself are protected when accessing our locations, sites, offices and /or premises;
- For providing you with our services and products according to agreed terms and as per your request, hence for the purpose of allowing the commercial terms to be executed between parties and to enable you to have a good customer experience;
- For carrying through the specific transactions and bookings and for maintaining our contractual and business relationship with our customers and/or vendors, including for maintaining a routine administrative flow and a routine contractual relationship with our customers and vendors and their representatives ("business contacts") thereto during the delivery and execution of a commercial engagement;
- For facilitating our communication with you to ensure business continuity, including for providing you with necessary information, references and recommendations about our services and products;
- For monitoring your use of our systems to enable us to personalize your experience on our websites and webpages (including monitoring the use of our website and any apps and tools you use);
- For improving the security and functioning of our websites, webpages, networks and information, to ensure that you receive an excellent user experience whilst our networks and information are secure;
- For provisioning you with tailored newsletters and/or notifications, including relevant press releases to help you stay up to date with our products and services For operating and managing our business operations, for ensuring the proper functioning of our business operations;
- For conducting and manage anti-corruption, anti-fraud, anti-bribery checks, to assess and address risk management to avoid non-compliance, setbacks of our business and protecting of our reputation;
- Apply analytics to business operations and data to describe, predict and improve business performance within our tool and/or to provide a better user experience. Specifically, areas within analytics include descriptive analytics, predictive analytics, analytics involving individuals (i.e. clients) use Personal Data, analytics driven by marketing, single customer view and customer journey, talent/employee management analytics, for ensuring the proper functioning of our business operations;
- Marketing our products and services to you, unless you objected against such processing, so that we can ensure that we can conduct and increase our business.

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Legal basis for collection and processing of your Personal Data? We process your Personal Data for the purposes set out in this Privacy Policy based on one or more of the following legal basis:

- Because we are required to do so for compliance with a legal obligation to which we are subject;
- Because such data is necessary for the performance of a contract to which you and/or the company you represent are a party to;
- Because the processing is necessary for the purposes of the legitimate interests pursued by us, by yourself or by a third party, or;
- Where necessary in order to protect the vital interests of any person;
- Based on your prior consent, to the extent such consent is mandatory under applicable laws.

Geographies where we collect and process your Personal Data. We may transfer Personal Data collected by us on an aggregated or individual level to various divisions, subsidiaries, joint ventures and affiliated companies of Globicon Terminals for the purposes stated above and in accordance with applicable laws, as well as to data processors outside of Globicon Terminals for storage and service purposes. Your Personal Data will not be disclosed to anyone outside Globicon Terminals group of companies unless permitted or required under applicable legislation.

Nevertheless, where there is a need, we may share your Personal Data with third parties, such as, services providers, professional advisors, lawyer offices, tax consultants, corporate commercial transactions, public authorities. Before doing so, we take steps to protect your Personal Data. Any third-party service providers and professional advisors to whom your Personal Data are disclosed, are expected and required to protect the confidentiality and security of your Personal Data and may only use your Personal Data in compliance with applicable data privacy laws and/or contractual stipulations.

Personal Data retention. We will retain the data for as long as you use the website and as long we have an ongoing relationship with you and for a reasonable time thereafter. Please note that some or all of the data may be required in order for the website to function properly, and we may be required to retain certain information by law. We might retain your Personal Data longer, based on your legitimate interest or consent (i.e. to provide you with the history of the containers booking).

We maintain specific records management and retention policies and procedures, so that Personal Data are deleted after a reasonable time according to the following retention criteria:

- We retain your Data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain your Data for as long as needed in order to comply with our legal and contractual obligations.

In such a case we will retain your Personal Data for as long as you request us to do so but not more than for a reasonable period of time, and in any case not more than 4 years. We may retain your Personal Data where this is advisable to safeguard or improve our legal position (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

We delete or anonymize your Personal Data when it is no longer needed for the purposes for which it was collected and subsequently processed.

Data Subjects rights. You are entitled, in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law, to:

- Request access to the Personal Data we process about you: this right entitles you to know whether we hold Personal Data of you and, if so, obtain information on and a copy of those Personal Data.
- Request rectification of your Personal Data: this right entitles you to have your Personal Data be corrected if it is inaccurate or incomplete.
- Object to the processing of your Personal Data: this right entitles you to request that we no longer process your Personal Data.
- Request the erasure of your Personal Data: this right entitles you to request the erasure of your Personal Data, including where such Personal Data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your Personal Data: this right entitles you to request that we only process your Personal Data in limited circumstances, including with your consent.

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- Request portability of your Personal Data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of Personal Data that you have provided to us, or request us to transmit such Personal Data to another data controller.

Note that most of the Personal Data that we hold about you comes from information you completed, therefore, please ensure that you keep your information correct and up to date by updating your profile/information on the website.

Please note, however, that certain Personal Data may be exempt from the above-mentioned rights pursuant to applicable data privacy or other laws and regulations.

To the extent that the processing of your Personal Data is based on your consent, you have the right to withdraw such consent at any time by contacting our office. Please note that this will not affect our right to process Personal Data obtained prior to the withdrawal of your consent, or its right to continue parts of the processing based on other legal bases than your consent.

If you wish to exercise your right to access your Personal Data, to object to it being processed or to rectify processed data, please contact info@ictpl.net or send a letter to INTERNATIONAL CARGO TERMINAL PRIVATE LIMITED, Village – Koproli, Taluka – Uran, Navi Mumbai 410206, Maharashtra, India.

Security measures. We place a great importance to your right to privacy and the protection of your Personal Data. We want you to feel secure that when you deal with us, your Personal Data are in good hands. Therefore, we protect your Personal Data in accordance with applicable data privacy laws and our data privacy policies and principles. Further, we have implemented appropriate organizational and technical security measures to protect your Personal Data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto. We maintain organizational, physical and technical security arrangements for all the Personal Data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of Personal Data and the processing we undertake. We store Personal Data on servers with limited access located in secured facilities, and our security measures are evaluated on an ongoing basis. The servers are protected by anti-virus software and firewalls, among other measures.

Cookies and other tracking technologies. Our websites use cookies. A cookie is a small text file, which is stored on your computer in order to recognize your computer at recurring visits. The cookie may transmit information via your browser with a purpose of authenticating or identifying the computer (via e.g. the IP address) or the user. Cookies may contain information such as registration data and user preferences. When a server receives a request from a computer which stores a cookie from the website, the server is able to use the information stored in the cookie in combination with the information stored on the server. A cookie cannot collect information from your computer and cannot carry any viruses or other damaging files.

By using our services, websites and webpages, you are consenting to our processing of your Personal Data and information, including the use of cookies and other tracking technology as well as the potential transfer of your Personal Data to our international divisions, subsidiaries, joint ventures, affiliated companies, as set forth in this Privacy Policy.