

# PRIVACY. STATEMENT. SEATRADE.



This website is provided and controlled by Seatrade Groningen B.V., kvk no.: 02050641 (“Seatrade Groningen B.V.”), which company forms part of the Seatrade Shipmanagement Group.

## 1. SCOPE

Seatrade Shipmanagement Group (“Seatrade”) recognizes and respects the importance of the privacy of our visitors of our websites. This policy accounts for the personal data used via our websites. If you do not agree with the terms herein, please do not use this website.

Please be aware that a separate privacy statement applies to recruitment. The privacy statement applicable to recruitment is available here.

## 2. PERSONAL DATA

On our websites, we may collect information about name, postal address, email address, other contact information, age, interests, gender, IP addresses and other personal data. Our websites are intended for a general audience, and Seatrade does not knowingly collect personal data about any person under the age of 18 years.

We process personal data for the following purpose:

Provision of Seatrade services and products and to accommodate your requests and inquiries. As a global group Seatrade may transfer personal data collected by us on an aggregated or individual level to various divisions, subsidiaries, joint ventures and affiliated companies of Seatrade Shipmanagement Group (“Seatrade Group”). Personal data will not be disclosed to anyone outside the Seatrade Group without your consent unless permitted or required under applicable legislation.

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

If you have submitted personal data to us, you enjoy certain rights to access and rectify data, however, subject to certain legal limitations.

We have implemented appropriate organizational and technical security measures to protect your personal data. 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.

## 3. CHANGES

We reserve the right in our sole discretion to amend and/or delete this privacy policy at any time without providing prior notice to you. We will post the at any time current version of this privacy policy on the website.

## 4. CONTACT DETAILS

If you have any questions or comments or wish to exercise your rights under applicable legislation, please contact our privacy team by emailing to [personnel@seatrade.nl](mailto:personnel@seatrade.nl).

For further information, kindly refer to the NVP Recruitment Code.

## RECRUITMENT CODE

### THE CODE OF CONDUCT FOR RECRUITMENT & SELECTION

The NVP Recruitment Code (hereinafter referred to as 'the code') contains the basic rules that, in the opinion of the Dutch Association for Personnel Management and Organisational Development (NVP), should be observed by organisations (companies and institutions entering into relationships) and applicants during the recruitment and selection process. The purpose of the code is to provide a standard for a transparent and fair recruitment and selection procedure.

The code is set up chronologically, from the time that the job becomes vacant through to the date of appointment of an applicant. The organisation may adapt the code and/or application thereof to meet its own specific requirements if there is reason to do so.

The NVP will monitor the recruitment and selection practice of organisations and use its influence to ensure that the recruitment and selection practice is improved and maintained at the level advocated by the NVP. The code has been drawn up in consultation with the Labour Foundation (Stichting van de Arbeid).

#### 1 UNDERLYING PRINCIPLES

- 1.1** The code is based on the following underlying principles:
- the applicant has a fair chance at appointment (equal opportunity for equal ability; the organisation will choose on the basis of suitability with respect to the position);
  - the applicant will be properly and fully informed of the application procedure – even if social media plays an important role –, the details of the vacant position and the level thereof within the organisation;
  - the organisation will request that the applicant provide only the information that is needed to assess suitability for the position;
  - the applicant will provide the organisation with the information that it needs to form a true and fair picture of the applicant's suitability for the vacant position.
  - the information provided by the applicant will be treated confidentially and with due care; the applicant's privacy will also be respected in other matters;
  - both the applicant and organisation are aware that information available from open sources such as the Internet and information obtained from third parties is not always reliable;
  - if an applicant submits a written complaint to the organisation concerning negligent, unfair or incorrect treatment, the organisation will respond to that complaint in writing.

**1.2** It is important that the applicant has a clear understanding of the application procedure to be followed. This means that if the organisation deviates from the procedure originally chosen, these changes must be communicated and explained to the applicant. The applicant may request that the procedure be deviated from if there is a reason to do so.

**1.3** The code applies to a procedure that is directed towards filling a vacancy within a organisation and for which the recruitment of candidates takes place by a) public announcement, such as advertisements in public (social) media and unsolicited applications b) within a restricted circle, such as through acquaintances or family, the work placement branch of the Employee Insurance Agency (UWV Werkbedrijf), notice boards, internal recruitment and c) through outside placement agencies.

**1.4** The code is in line with current European and Dutch legislation.

#### 2 VACANCY

**2.1** Should the organisation decide that a vacancy exists or will exist and that it must be filled, it will prepare a recruitment profile in which the relevant details of such vacant position are set out. This will in any event include: the duties and responsibilities accompanying such position, the level/place of the position within the organisation, the nature of the employment (for example,

temporary or secondment), working hours and duration (for example, part-time or in shifts) and work location.

**2.2** Job requirements may relate to professional competence (education, knowledge and experience), conduct and personal skills. Requirements of a personal kind will be set only if necessary for the proper performance of the job-related duties and to the extent they do not conflict with statutory regulations.

#### 3 RECRUITMENT

**3.1** In addition to the relevant job description, the recruitment profile will state the method of application, the information to be provided by the applicant (such as education, diplomas, employment history and experience), any additional selection procedures and/or methods (such as psychological tests and/or assessment), a pre-employment medical examination, a mandatory examination of personal history and the term within which the application must be submitted. In the event a organisation is making use of an unsolicited application, the organisation will provide the aforementioned information to the applicant at the applicant's request.

**3.2** External placement agencies and organisations making use of data obtained from job sites and/or the Internet must inform the person in question if using this information in databases or for placement purposes.

**3.3** If it is necessary to set an age limit, the reason for this restriction will be indicated.

**3.4** If an affirmative action policy is being pursued with respect to certain groups, this policy and the underlying reasons will be expressly stated.

**3.5** Regardless of the method of application (for a job or an open application) the organisation will mention that candidates can be sought over the internet, including social media.

**3.6** The organisation will not require a (passport) photo of the applicant prior to the applicant being invited for an interview.

#### 4 SELECTION PHASE

**4.1** The organisation will notify the applicant in writing as soon as possible, but no later than two weeks after expiry of the closing date:

- if he has been rejected;
- if he is being invited for an interview;
- if the application is being put on hold (including indication of the time period within which further notice will follow).

If the applicant is invited for an interview or if the application has been put on hold, the organisation will include its current selection procedure and state the expected duration in its notification to the applicant.