

## Data Protection Policy

### 1 Introduction

- 1.1 This data protection policy (the “**Policy**”) sets out the approach of V.Group to handling Personal Data as controllers of Personal Data.
- 1.2 For further details of the applicable V.Group subsidiary or affiliate processing Personal Data of Data Subjects and as a controller (where applicable), please see Schedule 1 to this Policy.
- 1.3 This Policy includes the following policies (which are available at <https://vgrouplimited.com/data-protection-overview/> that set out V.Group’s approach to the processing of Personal Data:
- (a) the Personal Data Incident Notification Policy in relation to the procedures to be followed in the event of an incident relating to Personal Data;
  - (b) the Data Transfers Policy in relation to transfers of data to organisations outside of the EEA;
  - (c) the Data Retention & Destruction Policy in relation to the retention of data by V.Group; and
  - (d) the Privacy Policy for users of V.Group websites.
- 1.4 This Policy:
- (a) applies to all Colleagues;
  - (b) has been approved by the General Counsel of V.Group;
  - (c) may be amended by V.Group at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated by the version number.
- 1.5 Any breach of this Policy will be taken seriously and may result in disciplinary action.
- 1.6 Any questions or concerns about the operation of this Policy, including whether this Policy has been followed should be referred to the Data Protection Steering Group.
- 1.7 Where there are local requirements in respect of a particular jurisdiction, V.Group may state so and/or publish further policies.

### 2 Definitions

- 2.1 “**Colleague**” means any employee of V.Group;
- “**Data Subject**” means any individual who is the subject of Personal Data that is processed by V.Group;
- “**Data Protection Steering Group**” means the data protection steering group of V.Group which includes the Global DPO; it may be contacted at [data.protection@vgrouplimited.com](mailto:data.protection@vgrouplimited.com);
- “**Data Protection Laws**” means all applicable laws, rules, regulation, directives and governmental requirements relating in any way to the privacy, confidentiality, security, integrity and protection of Personal Data, including without limitation: the Data Protection Act 2018; the Philippine Data Privacy Act of 2012 and its implementing rules and regulations; the EU General Data Protection Regulation 2016/679 (“GDPR”), the

EU ePrivacy Directive 2002/58/EC, each as amended or superseded from time to time, and any EU Member State national implementing legislation;

“**Data Protection Representative**” means an appointed person responsible for data protection matters for a particular business unit of V.Group;

“**EEA**” means the European Economic Area;

“**Global DPO**” means the data protection officer for V.Group globally and for GDPR purposes as set out in Schedule 2;

“**Group Legal**” means the legal function of V.Group (which may be contacted via [legal@vgroupplimited.com](mailto:legal@vgroupplimited.com));

“**Personal Data**” means any data relating to an identified or identifiable person, such as name, addresses, email addresses, telephone numbers, dates of birth, identity card numbers, human resources files about employees, details of clients and suppliers;

“**process**” or “**processing**” or “**processed**” means any operation performed upon Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;

“**Regional DPO**” means the data protection officer for V.Group in a particular country or region as set out in Schedule 2;

“**Sensitive Personal Data**” means any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, data concerning sex life or sexual orientation, data concerning the commission of any offence;<sup>1</sup> and

“**V.Group**” means Vouvray Acquisition Ltd and its subsidiaries and/or affiliates.

2.2 Words denoting the singular shall include the plural and vice versa.

### 3 What is Personal Data?

3.1 Personal Data is data relating to an individual. This Policy sets out the approach of V.Group to handling Personal Data (as opposed to business or other data).

### 4 DPOS, Data Protection Steering Group and Data Protection Network

4.1 The Global DPO is responsible for monitoring and enforcing V.Group’s compliance with Data Protection Laws and will do so in conjunction with:

- (a) other members of the Data Protection Steering Group;
- (b) Regional DPOs (as set out Schedule 2); and
- (c) Data Protection Representatives,

together, the “**Data Protection Network**”. The Global DPO and Data Protection Network will work together to ensure compliance with Data Protection Laws.

4.2 Process for data protection queries

If there are data protection queries, please follow the following process:

- (a) in the first instance, consult this Policy and/or the other policies mentioned in Paragraph 1.3;
- (b) if the query cannot be resolved as above, contact your Data Protection Representative or Regional DPO;

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<sup>1</sup> Philippines: For DPA purposes, Sensitive Personal Data includes any other Personal Data classified as “sensitive personal information” by applicable Philippines data privacy laws.

- (c) if the query cannot be resolved as above, contact the Data Protection Steering Group by emailing [data.protection@vgrouplimited.com](mailto:data.protection@vgrouplimited.com) (with a copy to the Data Protection Representative or Regional DPO).

## 5 Collection and Use of Personal Data

### 5.1 V.Group collects Personal Data relating to:

- (a) applicants for employment, full, part-time and temporary employees (“**Employee Personal Data**”);
- (b) applicants for seafarer employment, full, part-time and temporary seafarers whom V.Group may engage (“**Seafarer Personal Data**”);
- (c) contractors (“**Contractor Personal Data**”);
- (d) clients (“**Client Personal Data**”);
- (e) suppliers and other persons who provide goods and/or services to V.Group (“**Supplier Personal Data**”); and
- (f) users of our websites or other related services provided by V.Group (“**User Personal Data**”).

### 5.2 Employee Personal Data and Seafarer Personal Data

- (a) V.Group may hold and process the following types of Employee Personal Data and Seafarer Personal Data:
  - (i) personal details: name, address and contact information, national identity/registry/insurance numbers, date of birth, gender, immigration status and eligibility to work;
  - (ii) family composition: names of spouses and/or dependents and emergency contact details;
  - (iii) employment details: CVs, recruitment details and application forms, job history and experience, references, qualifications, appraisals and performance ratings, promotions/demotions, training records, information related to an employment contract, working time records and records relating to holiday and other leave, disciplinary actions, investigations or grievances, and workplace accidents;
  - (iv) education and vocational training, language, and other job-related skills;
  - (v) medical and fitness details;
  - (vi) financial details, including salary, bonuses, expense reimbursement and benefit information, bank account numbers, pensions, and details of any company loans, contractual payment and entitlements; and
  - (vii) photographs of individuals.
- (b) The processing of Employee Personal Data and Seafarer Personal Data enables V.Group to perform its role as an employer and/or agent, including fulfilling its legal obligations under applicable laws and as necessary in connection with the performance of employment contracts. Without this information it would not be possible for V.Group to perform a worker’s employment contract. Certain Employee Personal Data and Seafarer Personal Data is processed by V.Group for its legitimate business interests, including without limitation:
  - (i) administration and management of its employees;
  - (ii) administration of employee benefits and entitlements;
  - (iii) recruitment and determining suitability for employment or promotion;
  - (iv) conducting employee appraisals and performance evaluations;
  - (v) administering payroll services and other benefits, including pay, allowances, pension, health and life insurance, and other benefits, taxation, and other deductions from pay;

- (vi) ensuring employee health and safety, monitoring attendance, and determining physical and/or mental fitness to work;
  - (vii) disciplining and investigating suspected misconduct or non-performance of duties;
  - (viii) responding to grievances and terminating employment;
  - (ix) training;
  - (x) ensuring legal and regulatory compliance, including monitoring compliance with internal rules and policies;
  - (xi) data backup, data archive and document retention; and
  - (xii) risk management, legal, accounting, and audit functions.
- (c) V.Group may disclose and/or transfer Employee Personal Data and Seafarer Personal Data within V.Group or to third parties for the purposes set out above. The parties to whom V.Group may disclose or otherwise transfer Employee Personal Data and Seafarer Personal Data include:
- (i) V.Group's affiliates for purposes consistent with their legitimate business practices and this Policy;
  - (ii) business associates and other professional advisors;
  - (iii) third party service providers or processors performing services on V.Group's behalf or providing products, such as:
    - (A) human resources functions and other business processes, including without limitation recruitment, payroll, employee benefits, and insurance;
    - (B) operation and maintenance and hosting of information systems;
    - (C) risk management, compliance, legal and audit functions, and/or support services;
    - (D) data backup and archive; and/or
    - (E) insurers;
  - (iv) to an investigative body in the case of a breach of an agreement or a contravention of law;
  - (v) as otherwise necessary, required or permitted by law or due to a request from a competent court, regulator or other authority; and
  - (vi) any prospective third party purchaser of the shares or assets of V.Group.
- (d) V.Group may also hold and process the following types of Sensitive Personal Data in relation to employees and seafarers:
- (i) racial or ethnic origin only where required for the purposes of compliance with anti-discrimination laws;
  - (ii) religious beliefs, sexual life, sexual orientation and gender reassignment where required by law;
  - (iii) health data where required by law and/or relating to benefits, accommodation of disabilities, leave entitlement, statutory sick pay, and/or health and safety at work;
  - (iv) trade union memberships data where required by law if applicable; and
  - (v) criminal background data where such checks are required by law.
- (e) V.Group will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the employee or seafarer's explicit consent has been obtained for the processing of such data (where such consent may be required by local law) or where necessary to protect the individual's vital interests.

### 5.3 Contractor Personal Data

- (a) V.Group may hold and process the following types of Contractor Personal Data:
  - (i) personal details, such as information which may identify contractor: name, address of work place, work contact information;

- (ii) details, such as information relating to the use of a contractor: job title/function and area of expertise;
  - (iii) financial details, such as any financial information required for the performance of a contract with any contractors who may be individuals: bank account details for purposes of invoicing, payments and the performance of the contract;
  - (iv) medical and fitness details;
  - (v) goods or services provided, including any information relating to goods and services that have been supplied by any contractors; and
  - (vi) photographs of individuals.
- (b) The processing of Contractor Personal Data enables V.Group to carry out its legal obligations in connection with the performance of its agreement with contractors. Without this information it would not be possible for V.Group to perform its contractual obligations. Certain Contractor Personal Data is processed by V.Group for its legitimate business interests, including without limitation:
- (i) keeping records relating to the business and activities carried out between V.Group and any contractors, including records of:
    - (A) accounts and business records;
    - (B) risk management, compliance, legal and audit functions; and/or
    - (C) financial reporting;
  - (ii) carrying out background checks for anti-money laundering compliance or for the purposes of financial sanctions screening where required by law; and
  - (iii) general processing relating to any goods and/or services provided and the performance of contracts with any contractors.
- (c) V.Group may disclose and/or transfer Contractor Personal Data within V.Group or to third parties only for the business-related purposes set out above. The parties to whom V.Group may disclose or otherwise transfer Contractor Personal Data include:
- (i) V.Group and its affiliates for purposes consistent with their legitimate business practices and this Policy;
  - (ii) employees and business associates;
  - (iii) third party processors utilised for risk management, compliance, legal and audit functions;
  - (iv) legal and other professional advisers, consultants and experts;
  - (v) financial organisations and advisers;
  - (vi) insurers;
  - (vii) persons making an enquiry or complaint, where required by law and/or with consent;
  - (viii) to an investigative body in the case of a breach of an agreement or a contravention of law;
  - (ix) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and
  - (x) any prospective third party purchaser of the shares or assets of V.Group.
- (d) V.Group may also hold and process the following types of Sensitive Personal Data in relation to contractors:
- (i) criminal background data only in relation to compliance with anti-corruption and/or anti-bribery where such checks are required by law.
- (e) V.Group will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the contractor's explicit consent has been obtained for the processing of such data, where such consent may be required by local law.

#### 5.4 Client Personal Data

- (a) V.Group may hold and process the following types of Client Personal Data:
  - (i) personal details: client name, client business postal address, client business email address, client business telephone number, client personal mobile number;
  - (ii) financial details: any financial information required for the performance of a contract with clients, in particular, bank account details for purposes of invoicing, payments and the performance of the client contract;
  - (iii) goods or services provided by the V.Group to the client;
  - (iv) records of telephone conversations; and
  - (v) photographs of individuals.
- (b) The processing of Client Personal Data enables V.Group to perform its role as service provider, including carrying out its obligations in connection with the performance of its client contracts. Without this information it would not be possible for V.Group to perform a client contract. Certain Client Personal Data is processed by V.Group for its legitimate business interests, including without limitation:
  - (i) keeping records relating to the business and activities carried out by the V.Group with its clients, including records of:
    - (A) general processing relating to the performance of contracts with, and provision of services and/or products to, clients; and
    - (B) client relationship management, including advertising, marketing and public relations;
  - (ii) carrying out background checks for anti-corruption/anti-bribery compliance or for anti-money laundering compliance or financial sanctions screening where required by law and credit worthiness; and
  - (iii) financial records and audits related to client contracts and relationships.
- (c) V.Group may disclose and/or transfer Client Personal Data within V.Group or to third parties only for the business-related purposes set out above. The parties to whom V.Group may disclose or otherwise transfer Client Personal Data include:
  - (i) V.Group and its affiliates for purposes consistent with their legitimate business practices and this Policy;
  - (ii) employees and business associates;
  - (iii) third party processors utilised for risk management, compliance, legal and audit functions;
  - (iv) legal and other professional advisers, consultants and experts;
  - (v) financial organisations and advisers;
  - (vi) insurers;
  - (vii) persons making an enquiry or complaint, where required by law and/or with consent;
  - (viii) to an investigative body in the case of a breach of an agreement or a contravention of law;
  - (ix) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and
  - (x) any prospective third party purchaser of the shares or assets of V.Group.
- (d) V.Group may also hold and process the following types of Sensitive Personal Data in relation to clients:
  - (i) criminal background data only in relation to compliance with anti-corruption and/or anti-bribery where such checks are required by law.
- (e) V.Group will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the client's explicit consent has been obtained for the processing of such data, where such consent may be required by local law.

## 5.5 Supplier Personal Data

- (a) V.Group may hold and process the following types of Supplier Personal Data:
  - (i) personal details: name/contact;
  - (ii) employment details: work address, work contact information, job title or function;
  - (iii) financial details, such as any financial information required for the performance of a contract with suppliers who may be individuals: bank account details for purposes of payment or expense reimbursement, invoices for services rendered, payment for goods supplied;
  - (iv) goods or services provided, including any information relating to goods and services that have been supplied by suppliers; and
  - (v) photographs of individuals.
- (b) The processing of Supplier Personal Data enables V.Group to perform its obligations in connection with the performance of its contracts with suppliers. Without this information it would not be possible for V.Group to perform a supplier contract. Certain Supplier Personal Data is processed by V.Group for its legitimate business interests, including without limitation:
  - (i) keeping records relating to the business and activities carried out between the V.Group and any suppliers, including records of:
    - (A) accounts and business records;
    - (B) risk management, compliance, legal and audit functions; and
    - (C) financial reporting;
  - (ii) carrying out background checks for anti-money laundering compliance or for the purposes of financial sanctions screening where required by law; and
  - (iii) general processing relating to any goods and/or services provided and the performance of contracts with any suppliers.
- (c) V.Group may disclose and/or transfer Supplier Personal Data within V.Group or to third parties only for the business-related purposes set out above. The parties to whom V.Group may disclose or otherwise transfer Supplier Personal Data include:
  - (i) V.Group and its affiliates for purposes consistent with their legitimate business practices and this Policy;
  - (ii) employees and business associates;
  - (iii) third party processors utilised for risk management, compliance, legal and audit functions;
  - (iv) legal and other professional advisers, consultants and experts;
  - (v) financial organisations and advisers;
  - (vi) insurers;
  - (vii) persons making an enquiry or complaint, where required by law and/or with consent;
  - (viii) to an investigative body in the case of a breach of an agreement or a contravention of law;
  - (ix) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and
  - (x) any prospective third party purchaser of the shares or assets of V.Group.
- (d) V.Group may also hold and process the following types of Sensitive Personal Data in relation to suppliers:
  - (i) criminal background data only in relation to compliance with anti-corruption and/or anti-bribery where such checks are required by law.
- (e) V.Group will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the supplier's explicit

consent has been obtained for the processing of such data, where such consent may be required by local law.

## 5.6 User Personal Data

V.Group will hold and process User Personal Data as set out in the Privacy Policy.

## 6 Processing of Personal Data

### 6.1 V.Group handles all Personal Data such that it is:

- (a) processed lawfully, fairly and in a transparent manner in relation to the Data Subjects;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes will not be considered to be incompatible with the initial purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate, where necessary, kept up to date and every reasonable step must be taken to ensure that Personal Data that is inaccurate is erased or rectified without delay;
- (e) kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed; Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate measures;
- (f) processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, using appropriate measures; and
- (g) only disclosed to third parties or transferred outside a country's or region's borders in accordance with Data Protection Laws and ensuring adequate levels of data protection.

## 7 Rights of Data Subjects

### 7.1 V.Group will respond to requests made by Data Subjects to exercise their legal rights in relation to Personal Data that V.Group holds about them. Subject to applicable exemptions, Data Subjects have the following rights:<sup>2</sup>

- (a) Right to be informed  
Right to be informed about any Personal Data held about them by V.Group.
- (b) Right of access  
Right to request access to their Personal Data and be provided information in relation to that data (including the purposes for which the data is processed, how long it will be stored for, the right to lodge a complaint with a supervisory authority).
- (c) Right to rectification

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<sup>2</sup> Philippines: For DPA purposes, data subjects have the right:

- (i) to lodge a complaint with the Philippine National Privacy Commission for violations of applicable Philippines data privacy laws; and
- (ii) to be indemnified for any damages sustained due to use of inaccurate, incomplete, outdated, false, or unlawfully obtained Personal Data, or due to unauthorised use of Personal Data.



- (d) Right to have their inaccurate Personal Data amended.  
Right to erasure  
Right to have their inaccurate Personal Data erased.
- (e) Right to restrict processing  
Right to restrict processing of their Personal Data.
- (f) Right to data portability  
Right to receive a copy of their Personal Data in a machine-readable format or to have their Personal Data sent to another entity.
- (g) Right to object  
Right to object to the processing of their Personal Data.
- (h) Right in relation to automated decision making and profiling  
Right not to be subject to a decision which is based on automated processing or profiling that could result in a significant effect on the Data Subject, such as discriminatory effects.

## **8 Subject Access Requests**

- 8.1 If making a request to access your Personal Data please follow the instructions at <https://vgrouplimited.com/data-protection-overview/> and send to [data.request@vgrouplimited.com](mailto:data.request@vgrouplimited.com) the necessary documents.
- 8.2 If you receive a request from a third party requesting access to their Personal Data or any of the other rights set out in Paragraph 7, please contact [data.request@vgrouplimited.com](mailto:data.request@vgrouplimited.com) immediately, because V.Group must respond to the request within prescribed time limits. You must not provide any requested information to a third party unless approved by the Data Protection Steering Group.
- 8.3 V.Group shall handle subject access requests as follows:
- (a) V.Group shall identify the data subject;
  - (b) V.Group shall provide the requested information within one month of receipt of request; this period may be extended by two further months where necessary, taking into account the complexity and number of the requests; V.Group shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay;
  - (c) where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject;
  - (d) where the request concerns a large quantity of information, V.Group reserves the right to ask the data subject to specify the information the request relates to;
  - (e) if V.Group does not take action on the request of the data subject, V.Group shall inform the data subject within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy; and
  - (f) V.Group reserves the right to charge a reasonable fee for access or not to act on the request, where permitted by law.

## **9 Appointing Data Processors**

- 9.1 When appointing third parties to carry out processing of Personal Data on V.Group's behalf, V.Group shall impose contractual obligations dealing with the protection and security of that information such that these third parties are contractually required to, amongst other obligations, act in a manner consistent with V.Group's instructions when

processing Personal Data and that they have in place appropriate technical and organisational security measures to safeguard such Personal Data.

## **10 Record Keeping**

- 10.1 V.Group maintains various records including the following:
- (a) processing activities carried out by V.Group;
  - (b) consents provided by Data Subjects (where applicable); and
  - (c) data protection related policies and procedures.

## **11 Breach Notification**

- 11.1 V.Group has in place the Personal Data Incident Notification Policy to be followed in the event of an incident and/or breach in relation to Personal Data.

## **12 Intra-group Data Transfers**

- 12.1 Personal Data may be transferred between companies in V.Group in accordance with Data Protection Laws and this Policy.

## **13 Transfers to Third Countries**

- 13.1 Given the international nature of V.Group's operations, Personal Data collected in the EEA may be transferred to countries outside the EEA or 'Third Countries' which may not have laws offering the same level of protection for Personal Data as those inside the EEA. V.Group will take steps to prevent the transfer of Personal Data without adequate safeguards being put in place and will ensure that Personal Data collected in the EEA and transferred internationally is afforded the same level of protection as it would be inside the EEA. For further information on the adequate safeguards adopted by V.Group for the international transfer of Personal Data, please see the Data Transfers Policy.<sup>3</sup>

## **14 Data Retention**

- 14.1 V.Group has in place the Data Retention & Destruction Policy to be followed in respect of the retention of Personal Data.

## **15 Breaches of this Policy**

- 15.1 Any actual or suspected breach of this Policy should be immediately notified to the Data Protection Steering Group by contacting [data.protection@vgrouplimited.com](mailto:data.protection@vgrouplimited.com).

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<sup>3</sup> Philippines: Where there are equivalent international transfers of Personal Data from the Philippines to those outside the Philippines, please see the Data Transfers Policy (Philippines) (<https://vgrouplimited.com/wp-content/uploads/2018/07/20180418-Data-Transfers-Policy-Philippines-.pdf>).

## 16 Document Control

- 16.1 The Global DPO is the owner of this Policy and is responsible for ensuring that it is reviewed in line with the relevant review requirements.
- 16.2 A current version of this Policy is available at <https://vgrouplimited.com/data-protection-overview/>
- 16.3 This Policy was approved as stated in this Paragraph and is issued on a version-controlled basis.

Version	Date of Issue	Approved by	Position
1	05.04.2018	Rod Day	Chief Financial Officer
2	10.10.2018	Deborah Grimason	General Counsel & Company Secretary
3	28.06.2019	Deborah Grimason	General Counsel & Company Secretary
4	29.10.2020	Deborah Grimason	General Counsel & Company Secretary

## Schedule 1

### V.Group data controllers

	Company	Country
1.	Baltic Crew International Ltd	Isle of Man
2.	Baltic Group International Far East JSC	Russia
3.	Baltic Group International Georgia Ltd	Georgia
4.	Baltic Group International Novorossiysk JSC	Russia
5.	Baltic Group International St Petersburg JSC	Russia
6.	China International Ship Management Co Ltd	China
7.	Dania Ship Management	Denmark
8.	Dania Ship Management Bulk	Denmark
9.	E-Hub Corporate Services (Pte) Ltd	India
10.	Global Marine Travel (UK) Ltd	UK
11.	Global Marine Travel LLC	USA
12.	Global Marine Travel Ltd	UK
13.	Graig Ship Management	UK
14.	H. Schuldt Shipbrokers GmbH & Co. KG	Germany
15.	H. Schuldt Shipbrokers (Asia) Ptd. Ltd	Germany
16.	Herm. Schuldt GmbH & Co. KG	Germany
17.	Inter Argo PH Inc	Philippines
18.	International Tanker Management Ltd	Bermuda
19.	International Tanker Management Texas Inc	USA
20.	ISS GMT B.V.	Netherlands
21.	Kestrel Shipping, Incorporated	Philippines
22.	North Sea Marine Services Corporation	Philippines
23.	Norddeutsche Reederei H. Schuldt GmbH & Co. KG	Germany
24.	Northern Crewing Services GmbH & Co. KG	Germany
25.	Oceanic Hospitality Training Centre Corporation	Philippines

26.	OCL Oceanic Catering Ltd	Cyprus
27.	OÜ Baltic Group International	Estonia
28.	Pacific Ocean Manning, Incorporated	Philippines
29.	SeaTec China Limited	China
30.	Seatec UK Ltd	UK
31.	Seaways Marine & Offshore Consulting Pte. Ltd.	Singapore
32.	Selandia Crew Management (India) Pvt. Ltd.	India
33.	Selandia Crew Management Pte. Ltd.	Singapore
34.	Selandia Ship Management (India) Pvt. Ltd.	India
35.	Selandia Ship Management (Latvia) Pvt. Ltd.	Latvia
36.	Selandia Ship Management (Singapore) Pte. Ltd.	Singapore
37.	Selandia Ship Management Pte. Ltd.	Singapore
38.	SIA LAT B.G.I.	Latvia
39.	UMC International (Far East) Pte Ltd	Singapore
40.	UMC International PLC	UK
41.	V.Group Global (Singapore) Pte Ltd	Singapore
42.	V.Holding Manpower Pvt Ltd	India
43.	V.Hong Kong Limited	Hong Kong
44.	V.Offshore (IOM) Ltd	Isle of Man
45.	V.Ships (Isle of Man) Ltd	Isle of Man
46.	V.Ships (Shanghai) Limited	China
47.	V.Ships Asia Group Pte Ltd	Singapore
48.	V.Ships Brasil SA	Brazil
49.	V.Ships Bulgaria Ltd	Bulgaria
50.	V.Ships Canada Inc	Canada
51.	V.Ships Croatia Ltd	Croatia
52.	V.Ships France SAS	France

<b>53.</b>	V.Ships Germany GmbH	Germany
<b>54.</b>	V.Ships Greece Ltd	Bermuda
<b>55.</b>	V.Ships India Pvt Ltd	India
<b>56.</b>	V.Ships Istanbul Denizcilik Hizmetleri Limited	Turkey
<b>57.</b>	V.Ships Italy S.r.L.	Italy
<b>58.</b>	V.Ships Leisure Limited	Isle of Man
<b>59.</b>	V.Ships Leisure SAM	Monaco
<b>60.</b>	V.Ships Leisure USA Inc	USA
<b>61.</b>	V.Ships Limited	Cyprus
<b>62.</b>	V.Ships Management Ltd	Isle of Man
<b>63.</b>	V.Ships Manpower SRL	Romania
<b>64.</b>	V.Ships Monaco SAM	Monaco
<b>65.</b>	V.Ships Norway AS	Norway
<b>66.</b>	V.Ships Offshore (Asia) Pte. Ltd	Singapore
<b>67.</b>	V.Ships Offshore Ukraine	Ukraine
<b>68.</b>	V.Ships PL ZOO	Poland
<b>69.</b>	V.Ships Services Oceana Inc.	Philippines
<b>70.</b>	V.Ships Ship Management India Pvt Ltd	India
<b>71.</b>	V.Ships UK Limited	UK
<b>72.</b>	V.Ships Ukraine Limited	Ukraine
<b>73.</b>	V.Ships USA LLC	USA
<b>74.</b>	VGG India Private Ltd	India
<b>75.</b>	VGG Services Ltd	Guernsey
<b>76.</b>	VS Marine Pvt Ltd	India

## Schedule 2

### V.Group DPOs and regional officers

DPO	Name	Email	Address	Telephone no.
<b>Global DPO (globally and for GDPR purposes)</b>				
Global DPO	Dora Costa	<a href="mailto:dpo@vgrouplimited.com">dpo@vgrouplimited.com</a>	V.Group, 1st Floor, 63 Queen Victoria Street, London, EC4N 4UA, UK	+44 207 3328510
<b>Regional DPOs / regional officers</b>				
<b>India</b>				
Grievance Officer	Manisha Rane	<a href="mailto:manisha.rane@vships.com">manisha.rane@vships.com</a>	Windsor Corporate Park, 7th floor, BEST Colony Road, Oshiwara, Goregaon West, Mumbai – 400 102	+91 22 6827 7000
Grievance Officer	Indra Priyadarshini T	<a href="mailto:priyadarshini.t@vships.com">priyadarshini.t@vships.com</a>	Unit S-005, Delta Wing, Ground Floor, Raheja Towers, 177, Anna Salai, Chennai – 600002, India	+91 44 4293 1730
<b>Philippines</b>				
Philippines DPO	Ferdinand Anda	<a href="mailto:ferdinand.anda@vships.com">ferdinand.anda@vships.com</a>	9F Aseana Two Bldg., Bradco Avenue, Aseana City, Paranaque City, Philippines 1702	+63 288589910
<b>Russia</b>				
Russia DPO (Baltic Group International, Saint-Petersburg)	Petr Suvorov	<a href="mailto:petr.suvorov@baltic-crew.com">petr.suvorov@baltic-crew.com</a>	23A, Vladimirsky prospect, “Renaissance Hall”, 5 <sup>th</sup> floor, St. Petersburg, Russia	+7 812 346 8008
Russia DPO (Baltic Group International, Novorossiysk Ltd)	Vladimir Feoktistov	<a href="mailto:vladimir.feoktistov@baltic-crew.com">vladimir.feoktistov@baltic-crew.com</a>	11b, Khvorostyanskogo str., Novorossiysk city, Krasnodar reg., Russia, 353925	+7 861 771 0083
Russia DPO (Baltic Group International Far East, JSC)	Dmitriy Belyakov	<a href="mailto:dmitry.belyakov@baltic-crew.com">dmitry.belyakov@baltic-crew.com</a>	12, Nakhodkinskiy Prospect, Nakhodka, 692904, Russia	+7 423 662 2255 / 69 2092
<b>Singapore</b>				
Singapore Chief DPO	Gelle Sia	<a href="mailto:gelle.sia@vships.com">gelle.sia@vships.com</a>	10, Hoe Chiang Road, #24-01/05, Keppel Towers, Singapore	+65 6885 0610
Singapore DPO	Esther Tan	<a href="mailto:esther.tan@vships.com">esther.tan@vships.com</a>		+65 6885 0610