

## Global Data Protection Policy

### 1 Introduction

- 1.1 V.Group considers the fair and lawful handling of Personal Data (as defined below) as key to our business and a prerequisite for the achievement of our strategic objectives.
- 1.2 This Global Data Protection Policy (the “**Policy**”) sets out the approach of V.Group to handling Personal Data as controllers of Personal Data.
- 1.3 This Policy also sets requirements regarding the way V.Group collects, handles, processes, shares, uses, transfers, stores and disposes of (collectively “**processes**”) Personal Data to ensure:
- (a) We comply with relevant privacy and data protection laws around the world.
  - (b) We are meeting the expectations of our clients, employees, seafarers, suppliers, job applicants and any other individuals whose Personal Data we process.
  - (c) We mitigate the risks associated with failure to comply with data protection and privacy laws and regulations applicable to the V.Group.
- 1.4 For further details of the applicable V.Group subsidiary or affiliate processing Personal Data of Data Subjects (as defined below) and as a controller (where applicable), please see Schedule 1 to this Policy.
- 1.5 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 United Kingdom and European Economic Area;
  - (c) the Data Retention & Destruction Policy in relation to the retention of data by V.Group; and
  - (d) the Privacy Notice for users of V.Group websites including employees, seafarers, contractors, suppliers, customers and job applicants.
- 1.6 This Policy:
- (a) applies to all Colleagues (as defined below);
  - (b) has been approved by the General Counsel & Company Secretary 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.
- 1.7 The aims of this Policy are to:
- (a) Define the minimum requirements for the processing of Personal Data.
  - (b) Provide a governance framework in order to ensure compliance with privacy legal and regulatory requirements across all relevant jurisdictions where V.Group operates.

- (c) Make everyone at V.Group aware of their responsibilities with regard to the confidentiality, integrity and availability of the V.Group's information systems and assets.
  - (d) Help us meet our legal and regulatory obligations, but, also, do the right thing, by ensuring that measures are in place to identify, handle and report privacy incidents in a timely and effective manner.
  - (e) Ensure there is accountability for compliance with the minimum requirements and the appropriate use of V.Group's Personal Data.
- 1.8 Any breach of this Policy will be taken seriously and may result in disciplinary action.
- 1.9 Any questions or concerns about the operation of this Policy, including whether this Policy has been followed should be referred to the Global DPO.
- 1.10 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 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: (a) the Philippine Data Privacy Act of 2012 and its implementing rules and regulations (together the "DPA"); (b) the EU General Data Protection Regulation 2016/679 ("GDPR"), (c) the EU ePrivacy Directive 2002/58/EC as amended by Directive 2009/136/EC, and any EU Member State national implementing legislation; (d) applicable laws regulating unsolicited telephone calls, email, text/SMS or other electronic or anti-spam legislation; (e) applicable laws relating to data breach notification; (f) applicable laws imposing minimum information security requirements; (g) applicable laws requiring the secure disposal of records containing Personal Data; and (h) applicable laws regulating cross-border data transfers of Personal Data; (i) the UK Data Protection Act 2018; and (j) the United Kingdom General Data Protection Regulation ("UK GDPR") each as amended or superseded from time to time.

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

**"Data Subject"** means any individual who is the subject of Personal Data that is processed by 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@vgrouplimited.com](mailto:legal@vgrouplimited.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).

3.2 This Policy covers all Personal Data V.Group processes regardless of the media on which such data is stored or whether it relates to past, present or future employees, seafarers, workers, clients or vendors, contacts, shareholders, job applicants, website users or any other Data Subject.

### **4 DPOs and Data Protections 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) Regional DPOs (as set out Schedule 2); and
- (b) 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; and

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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.

- (b) if the query cannot be resolved as above, contact your Data Protection Representative or Regional DPO.

## 5 Collections 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**”).

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

## 6 Principles Relating to Processing of Personal Data

6.1 The following data protection principles are fundamental to V.Group meeting its legal and regulatory obligations and everyone must comply with them:

6.2 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 (1<sup>st</sup> principle: Lawfulness, Fairness and Transparency);
- (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 (2<sup>nd</sup> principle: Purpose Limitation);
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (3<sup>rd</sup> principle: Data Minimisation);
- (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 (4<sup>th</sup> principle: Accuracy);
- (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 (5<sup>th</sup> principle: Storage Limitation);
- (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 (6<sup>th</sup> principle: Data Security – Integrity and Confidentiality);
- (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<sup>th</sup> principle – Transfer Limitation);

- (h) processed in a way that observes the rights afforded to individuals under their local privacy and data protection laws (8<sup>th</sup> principle: Respect for Individuals' Rights); and
- (i) processed by V.Group taking responsibility for complying with the data protection principles at the highest management level and throughout the organisation and demonstrating such compliance (9<sup>th</sup> principle: Accountability).

### 6.3 **Principle One**

*We will only process Personal Data lawfully, fairly and in a transparent manner.*

This means that V.Group must:

- Only process Personal Data where we have lawful grounds and legitimate business reasons to do so (Lawfulness and Fairness).
- Be transparent and inform individuals as to what data about them we collect and how we will use, share and destroy it (Transparency).

### 6.4 **Principle Two**

*We will collect Personal Data only for specified, explicit and legitimate purposes and we will not process it further in any manner incompatible with those purposes.*

This means that:

- V.Group must specify the purposes, i.e. reasons, why we are collecting and using Personal Data before the collection. We cannot - and must not - use Personal Data we have collected for a particular purpose (as usually described in the privacy notice, policy or statement) for anything else, unless all relevant legal and regulatory requirements regarding the additional use(s) are complied with.
- The individuals concerned have been informed and, where required, their consent has been obtained before their Personal Data can be used for any new, different or incompatible purposes from those disclosed in our privacy notices when we first obtained their Personal Data.

### 6.5 **Principle Three**

*We will only process Personal Data that is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.*

This means that V.Group must:

- Collect and retain only the data that we really need in order to carry out a specific purpose or function (that is even if the information would be useful to know/have).
- Not record data for the sake of it.
- Delete or anonymise any Personal Data no longer needed in accordance with the Data Retention & Destruction Policy or other relevant policies.

### 6.6 **Principle Four**

*We will ensure that the Personal Data we process is accurate and, where necessary, kept up to date.*

This means that V.Group must:

- Check and assess the accuracy of any Personal Data that we process at the point of collection and thereafter.

- Update, correct or delete (as relevant) without delay and in accordance with relevant processes and procedures any Personal Data found to be inaccurate or out-of-date.

## 6.7 Principles Five

*We will only keep Personal Data for as long as necessary for the purpose(s) for which it is required to be processed.*

This means that V.Group must:

- Retain Personal Data in accordance with the Data Retention & Destruction Policy and where applicable, local policies and ensure we can justify why we need to retain the relevant Personal Data.
- Ensure that Personal Data is securely disposed of in accordance with the Data Retention & Destruction Policy or other relevant policies or is anonymised, as relevant, at the end of the appropriate period, unless otherwise required or permitted, e.g. a legal exemption.
- Ensure that any third parties that process on our behalf must also delete or return such data as applicable

## 6.8 Principle Six

*We will ensure that we process Personal Data in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.*

This means we must:

- Protect the confidentiality, integrity and availability of Personal Data, through all stages of the data lifecycle (from the point of collection to the point of destruction).
  - **Confidentiality** means that only people who have a need to know and are authorised to use the Personal Data can access it;
  - **Integrity** means that Personal Data is not altered, corrupted, damaged or lost as a result of unlawful or unauthorised processing; and
  - **Availability** means that only authorised users are able to access the Personal Data when they need it and only for authorised purposes.
  - Ensure that we have appropriate physical and technological security measures to protect the Personal Data whether it is on or off-site. The level of security required will depend on the nature of the data (e.g. particular care must be exercised in protecting sensitive Personal Data) and the potential harm that could be caused by the unlawful, unauthorised or accidental processing of Personal Data.
    - Train our staff on their privacy obligations on a regular basis. The training provided must take into consideration the risk presented by appropriate factors such as the nature and volume of data, the roles and activities of staff.
- Follow all local policies, procedures and guidelines we put in place to maintain the security of all Personal Data.
- Ensure that any third-party vendors or suppliers we use have appropriate security measures in place and a contract with V.Group, which details the data processing activities they will be carrying out, as well as their data protection obligations in relation to the Personal Data they will be accessing and processing (if such processing is applicable).

- Ensure that a secure method of transit is employed when Personal Data is transferred from one location to another.

#### 6.9 Principle Seven

*We will ensure that suitable safeguards are in place before transferring Personal Data to another country.*

This means that V.Group must:

- ensure that any Personal Data which V.Group is responsible for will be adequately protected in the country of destination when transferred cross-border and that requirements regarding transfers or data location (localisation) are complied with.
- Be aware that it is transferring Personal Data originating in one country across borders when we send, view or access that data in or to a different country.

#### 6.10 Principle Eight

*We will observe the rights afforded to individuals under their local privacy and data protection laws.*

This means that V.Group:

- Must ensure that all queries relating to privacy issues, in particular in relation to those concerning these rights, are promptly and transparently dealt with in accordance with local legal and regulatory requirements.
- Appropriate procedures must be in place to allow them to address any of the above in a compliant manner.

#### 6.11 Principle Nine

*We take responsibility for complying with the data protection principles at the highest management level and throughout our organisation and are able to demonstrate our compliance.*

This means V.Group:

- Takes responsibility for what we do with Personal Data and can demonstrate how we comply with the data protection principles and the steps we have taken to protect it and respect the rights of the individuals.
- Understand the relevant policies and procedures.
- Are aware of our responsibilities and understand the role Colleagues and others play in meeting our privacy and data protection obligations.
- Must implement appropriate technical and organisational measures and records in an effective manner, to ensure compliance with the data protection principles. V.Group is responsible for, and must be able to demonstrate, compliance with the data protection principles.
- Keep full and accurate records of all our data processing activities, also known as 'Records of Processing Activities'.
- Keep records of data subjects' consents and procedures for obtaining consents.
- Embed a privacy/data protection by design and by default approach in the way we develop a project, a system or an operation which will involve the processing of Personal Data. This means that appropriate data protection measures are implemented throughout the data lifecycle.
- Report any concerns, incidents or potential breaches to the Global DPO.

## 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  
Right to have their inaccurate Personal Data amended.
- (d) Right to erasure

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

- (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  
Right to have their inaccurate Personal Data amended.
- (d) Right to erasure  
Right to request to have their Personal Data erased where there is no compelling reason for its continued processing.
- (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.
  - (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.

Right to request to have their Personal Data erased where there is no compelling reason for its continued processing.

- (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 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 [dpo@vgrouplimited.com](mailto:dpo@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 Global DPO.

8.2 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 the 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, this Policy and the V.Group Data Transfer Policy.

## **13 Transfers to Third Countries**

- 13.1 Given the international nature of V.Group's operations, Personal Data collected in the United Kingdom and EEA may be transferred to countries outside the United Kingdom and EEA or 'Third Countries' which may not have laws offering the same level of protection for Personal Data as those inside the United Kingdom and 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 United Kingdom and EEA and transferred internationally is afforded the same level of protection as it would be inside the United Kingdom and 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 Global DPO by contacting [dpo@vgrouplimited.com](mailto:dpo@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) (<http://www.vgrouplimited.com/data-transfers-policy-philippines.aspx>).

## 16 Document Control

- 16.1 The General Counsel & Company Secretary is the owner of this Policy and is responsible alongside the Global DPO 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	06.12.2021	Deborah Grimason	General Counsel & Company Secretary

**Schedule 1**  
**V.Group data controllers**

	<b>Company</b>	<b>Country</b>
1.	Baltic Group International Far East JSC	Russia
2.	Baltic Group International Georgia Ltd	Georgia
3.	Baltic Group International Novorossiysk JSC	Russia
4.	Baltic Group International St Petersburg JSC	Russia
5.	Dania Ship Management	Denmark
6.	Dania Ship Management Bulk	Denmark
7.	E-Hub Corporate Services (Pte) Ltd	India
8.	Global Marine Travel LLC	USA
9.	H. Schuldt Shipbrokers GmbH & Co. KG	Germany
10.	Inter Argo PH Inc	Philippines
11.	International Tanker Management Ltd	Bermuda
12.	International Tanker Management Texas Inc	USA
13.	ISS GMT B.V.	Netherlands
14.	Kestrel Shipping, Incorporated	Philippines
15.	North Sea Marine Services Corporation	Philippines
16.	Northern Crewing Services GmbH & Co. KG	Germany

<b>17.</b>	Oceanic Hospitality Training Centre Corporation	Philippines
<b>18.</b>	OCL Oceanic Catering Ltd	Cyprus
<b>19.</b>	OÜ Baltic Group International	Estonia
<b>20.</b>	Pacific Ocean Manning, Incorporated	Philippines
<b>21.</b>	SeaTec China Limited	China
<b>22.</b>	Seatec Services Pte Ltd	Singapore
<b>23.</b>	Seatec UK Ltd	UK
<b>24.</b>	Selandia Crew Management (India) Pvt. Ltd.	India
<b>25.</b>	Selandia Crew Management Pte. Ltd.	Singapore
<b>26.</b>	Selandia Ship Management (India) Pvt. Ltd.	India
<b>27.</b>	Selandia Ship Management (Latvia) Pvt. Ltd.	Latvia
<b>28.</b>	Selandia Ship Management (Singapore) Pte. Ltd.	Singapore
<b>29.</b>	Selandia Ship Management Pte. Ltd.	Singapore
<b>30.</b>	SIA LAT B.G.I.	Latvia
<b>31.</b>	V.Group Global (Singapore) Pte Ltd	Singapore
<b>32.</b>	V.Holding Manpower Pvt Ltd	India
<b>33.</b>	V.Hong Kong Limited	Hong Kong
<b>34.</b>	V.Scope (Germany) GmbH & Co KG	Germany
<b>35.</b>	V.Ships (Isle of Man) Ltd	Isle of Man
<b>36.</b>	V.Ships (Shanghai) Limited	China
<b>37.</b>	V.Ships Asia Group Pte Ltd	Singapore
<b>38.</b>	V.Ships Brasil SA	Brazil
<b>39.</b>	V.Ships Bulgaria Ltd	Bulgaria
<b>40.</b>	V.Ships Canada Inc	Canada

41.	V.Ships Croatia Ltd	Croatia
42.	V.Ships France SAS	France
43.	V.Ships Germany GmbH	Germany
44.	V.Ships Greece Ltd	Bermuda
45.	V.Ships (Hamburg) GmbH & Co KG	Germany
46.	V.Ships India Pvt Ltd	India
47.	V.Ships Istanbul Denizcilik Hizmetleri Limited	Turkey
48.	V.Ships Italy S.r.L.	Italy
49.	V.Ships Leisure Limited	Isle of Man
50.	V.Ships Leisure SAM	Monaco
51.	V.Ships Leisure USA Inc	USA
52.	V.Ships Limited	Cyprus
53.	V.Ships Management Ltd	Isle of Man
54.	V.Ships Manpower SRL	Romania
55.	V.Ships Monaco SAM	Monaco
56.	V.Ships Norway AS	Norway
57.	V.Ships Offshore (Asia) Pte. Ltd	Singapore
58.	V.Ships Offshore Ukraine	Ukraine
59.	V.Ships PL ZOO	Poland
60.	V.Ships Services Oceana Inc.	Philippines
61.	V.Ships Ship Management India Pvt Ltd	India
62.	V.Ships UK Limited	UK
63.	V.Ships Ukraine Limited	Ukraine
64.	V.Ships USA LLC	USA
65.	VGG India Private Ltd	India

66.	VS Marine Pvt Ltd	India
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## 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>Germany</b>				
DPO Germany	Dennys Wulf	<a href="mailto:dpo.germany@vships.com">dpo.germany@vships.com</a>	Rolandsbrücke 4 20095 Hamburg Germany	+49 40 30905 123
<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>	EA Chambers Tower II, 8th Floor, No 49, 50L, Whites Road, Royapettah, Chennai – 600 014, 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 Mobile: +639176317065
<b>Russia</b>				
Russia DPO (Baltic Group International, Saint-Petersburg)	Victor Khodakov	<a href="mailto:victor.khodakov@baltic-crew.com">victor.khodakov@baltic-crew.com</a>	23A, Vladimirsky prospect, "Renaissance Hall", 5th 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
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