

## Privacy Notice

### General Information

This site uses cookies to store information on your computer. Some are essential to make our site work; others help us improve the user experience. By using the site, you consent to the placement of these cookies.

## PRIVACY POLICIES

### Who we are

Volvelle Ltd is a company directed to the shipping industries with headquarters in Limassol Cyprus and we operate under the registration number HE436670. We developed throughout the years' long standing relations with our customers, suppliers, employees and collaborators, who have been of utmost importance to us by helping Volvelle Ltd to build a successful presence in our territory. We do not knowingly attempt to solicit or receive information from children nor personal details and sensitive data of individuals that are not related to commercial matters.

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Policy describes Volvelle Ltd policies and practices regarding the collection and use of your personal data, and clarifies your privacy rights. We recognize that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Policy as we undertake new personal data practices or adopt new privacy policies. Our Privacy Policy uses terms which are defined and have the same meaning as in the EU General Data Protection Regulation 2016/679/EU (GDPR).

### Data subject rights

The European Union's General Data Protection Regulation provide certain rights for data subjects. This Privacy Policy is intended to provide you with general information about what personal data Volvelle Ltd collects about you and how it is used. If you have any questions, please contact us at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy)

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside Volvelle Ltd might have received the data from Volvelle Ltd; what was the source of the information (if you didn't provide it directly to Volvelle Ltd); and how long it will be stored.

You have a right to: (i) access and confirm your information, (ii) you have the right to correct (rectify) the record of your personal data maintained by Volvelle Ltd if it is inaccurate or not up to date, (iii) You may request that Volvelle Ltd erase your data (right to be forgotten) however this right may be subject to certain exceptions according applicable laws; (iv) you can also ask us to stop processing (using) your data (right to withdraw consent) if you do not agree with our collecting/processing mechanisms or (v) you may also request that Volvelle Ltd cease using your data for direct marketing purposes (right to restrict use of data); (vi) at your written request— we shall provide your personal data to you or transmit it directly to another controller (portability); and (vii) whenever you find necessary you have the right to lodge a complaint with the appropriate data protection authority (DPA) if you have concerns about how Volvelle Ltd processes your personal data.

In Cyprus, the Supervisory Authority for personal data protection is the Office of the Commissioner for Personal Data Protection. You can contact the Commissioner's Office at:

Iasonos str., 1082 Nicosia  
P.O.Box 23378, 1682 Nicosia  
Tel: +357 22818456  
Fax: +357 22304565  
Email: commissioner@dataprotection.gov.cy

Practical access to your personal data will be provided at no cost to you upon request made to Volvelle Ltd at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy), unless excessive requests are made in which case Volvelle Ltd may at its discretion charge a reasonable administrative fee. If the request made by you cannot be provided within the legal time frame, Volvelle Ltd will promptly provide you with a date when the information will be delivered. If for some reason access is denied, Volvelle Ltd will without delay provide an explanation as to why access has been denied i.e. technical contingencies, non-availability of the GDPR designated person, etc.

#### How to exercise your rights

You can exercise your rights at any time by contacting our GDPR Designated Person see detail below. In order to process your request effectively, efficiently and securely, please include in your email: (i) A clear statement on which rights you are seeking to enforce; (ii) Full description of the information or type of information that you are writing about; and (iii) Details which will confirm your identity, such as a scan of your passport or ID card sent to us marked as Confidential, this ID confirmation will be encrypted together with your request and subject to the retention period described herein.

#### GDPR Designated Person

Volvelle Ltd appointed a designated person to be contact if you have any questions or concerns about the Volvelle Ltd personal data policies or practices. The Volvelle Ltd GDPR designated person is:

Constantinos Ellinas  
Legal Director  
1-3 Spatharikou Street  
4004 Mesa Geitonia Limassol, Cyprus  
[gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy)  
+357 25889999

#### Why and how we collect and process (use) your personal data

We may collect your data electronically, visually or in hard copies depending on how we are interacting with you at the time of collection, however we do not sell personal information to anyone and only share it if/when necessary to the development of the business as mentioned below:

If you are our business collaborator: To ensure that we meet certain legal requirements such as KYC (know your customer) and AML (anti-money-laundering), we need to have certain details of our customers or details of individual contacts at customer's organisation (such as their names, telephone numbers and e-mail addresses, the same type of information is collected from suppliers and website users; apart of the legal requirements, the information is also used to provide our suppliers, customers and website users with products and services, including the promotion of products, to facilitate contact between suppliers and customers, newsletter,

direct mail offering the products and services of our companies and our principals (in case you opt to receive it), as well as informing about our events and business activities.

If you are our employee: Volvelle Ltd only collect details required as part of your application process or employment. We may collect information such as your name, age, contact details, education details, employment history, emergency contacts, next of kin, immigration status, passport details (for traveling use only), bank account details, utility bills and other relevant information required by local laws for the purposes of your employment. Where appropriate, and in the limits accepted by local laws, we may also collect information of a more sensitive nature related to your health as part of our “Health & Safety at Work” measures. To enable employees to conduct our business, Volvelle Ltd provides access to one another’s commercial contact information including name, position, telephone number, work address, work e-mail address, and photograph (in case you chose to provide one).

**CCTV:** When entering our premises, we collect the necessary personal data required for security and notification purposes. For security purposes, we also operate a Closed Circuit Television system (CCTV). The CCTV cameras only operate in common areas of our premises and are positioned so as not to intrude on privacy. The footage is kept for no longer than a month and access is strictly regulated.

#### Live events

Volvelle Ltd hosts many events throughout the year. These include in-person conferences. If you register for one of our events and you are a customer or supplier, we will access the information you provided to offer you with information and services associated with the event. If you are not yet a customer or supplier and you register for one of our events, we will collect your name and contact information (if you consented), which we will store in our secured database and use to provide you with information and services associated with the event and to inform you about upcoming events of our Volvelle Ltd.

If you are a presenter, panellist, exhibitor or a like at one of our events, we will collect information about you including your name, employer and contact information, and photograph. We may also make and store a recording of your voice and may in certain cases use it i.e. to include into our website. You may require at any time to have the recordings, removed from the website by simply e-mailing our GDPR designated person at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy)

If you do not wish to have your information included in an attendee list or to receive information from sponsors, co-sponsors and/or exhibitors, you can express your preferences when you register for events or you may contact Volvelle Ltd directly at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy).

Volvelle Ltd does not share your data with sponsors/co-sponsors and exhibitors.

In all our events be it private involving our staff, or open involving our guests, presenters, customers, principals, etc, we INFORM that we shall take photos and may film it, the images will be used only to illustrate and promote our events in our website, social medial and publications, if you do not want to have your picture/film taken you will be provided at entrance with a “sticker” informing to NOT PHOTOGRAPH you. Our media professionals will be instructed on the process.

#### Publications

Volvelle Ltd also subscribes to news feeds and blogs produced by third parties which we often link from our website. This means you may find yourself on the Volvelle Ltd website or reading an email from the Volvelle Ltd publications team and we will offer you a link to another organization's website. At these times please be aware you will be leaving the Volvelle Ltd website and the Volvelle Ltd is not responsible or liable for any content provided by these third-party websites or for the personal information they may happen to gather from you. We suggest you to always refer to the Terms of Use of such third parties before providing any information.

To receive the Volvelle Ltd newsletters by email, if you are still not in our mailing list, you will need to create a "profile" with us which involves providing the Volvelle Ltd with at least your first name and last name, an email address, and the country in which you live. The Volvelle Ltd does not share this information with any third party other than to store the information in our secured databases.

You may manage your profile by subscribing or unsubscribing at any time. Please note that if you have set your browser to block cookies, this may have an impact on your ability to unsubscribe. If you have any difficulties managing your email or other communication preferences with the Volvelle Ltd, please contact us at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy)

The Volvelle Ltd uses Google Analytics to track how often people gain access to or read our content. We use this information in the aggregate to understand what content our public find useful or interesting, so we can produce the most valuable content to meet your needs. For more information please see our Terms of Use.

Your correspondence with the Volvelle Ltd

If you correspond with us by email, postal service, or other form of communication, we may retain such correspondence and the information contained in it and use it to respond to your inquiry; to notify you of Volvelle Ltd conferences, publications, or other services; or to keep a record of your complaint, accommodation request, and the like. As always, if you wish to have the Volvelle Ltd to "erase" your personal information or otherwise refrain from communicating with you, please contact us at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy)

Note: if you ask the Volvelle Ltd not to contact you by email at a certain email address, the Volvelle Ltd will permanently delete that address from its mailing list in order to comply with your no-contact request.

Legal basis for processing your data

Our purposes and legal basis for processing your personal data may vary depending on our relation with you, however we will never process your personal data, if our interests are suppressing your interests or fundamental rights. As explained above, In order to conduct business and fulfil our legal, regulatory, and contractual obligations, we need to perform legitimate and fundamental processing activities related to: (i) Establishing/maintaining commercial and employment contracts and the provisions of the contractual obligations, including contract review; (ii) invoicing, remittance and collection; (iii) non-promotional communication; (iv) Responding to enquiries, requests, and complaints (v) performance measurement related to the business; (vi) Business Continuity and Contingency Planning; (vii) Legal and regulatory obligations; (viii) Employment processing; (ix) Workforce planning (x) Training and certifications; (xi) Emergency communications; (xii) Interacting with other

organisations, industry groups, and professional associations; (xiii) Internal ethics reporting and security.

Volvelle Ltd also processes your data to provide you with news, products or services from our Volvelle Ltd that you have shown interest and consented to receive from us and in case of job seekers to have them on our database to be able to offer a job position when we may have availability (for more detail see job seekers). We use this information solely to refine our communication and relation with you and to better tailor our efforts to meet your needs and to communicate with you about news, products or services that the Volvelle Ltd offers that may assist you in your professional duties. It is of essence for our business to have an open communication channel with our collaborators.

Personal information we may receive from third parties

From time to time, the Volvelle Ltd may receive personal information about individuals from third parties. This may happen if your employer signs you up for our events, visits etc. Our third-party partners may also share your personal information with the Volvelle Ltd such events, news, visits etc. But this information shall not be disclosed or distributed to persons not committed with the Volvelle Ltd.

What happens if you don't give us your data

You can consult our website without giving us your personal data. The information on our website is available for those who did not provide personal information. You can even enter only the minimal amount of information (name and contact information) to your "profile" if you wish, and you can edit your profile at any time. Some personal information is necessary so that the Volvelle Ltd can supply you with the products and/or services you have purchased or requested, and to authenticate you, so that we know it is you and not someone else making requests on your behalf. You may manage your Volvelle Ltd subscriptions and you may opt-out of receiving marketing or other sort of communication at any time by simply sending a message to the GDPR.

Job Seekers

Your personal data provided to us by you will be shared internally for the purposes of the recruitment exercise. This means that Volvelle Ltd Management personnel will have access to your data.

We will not share your data with third parties, unless you have given your explicit consent.

The organisation will not transfer your data outside of the EU unless you have given your explicit consent. At your discretion you may include your photo but this is not required by the Volvelle Ltd.

If your application for employment is unsuccessful, the organisation will hold your data on file for six months after the end of the relevant recruitment process. You can renew your application if you find useful by simply contacting us via our website "work with us" field. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personal file and retained during your employment and for long it may be necessary depending on legal basis. When providing us a hard copy of your CV our HR department will send you a standard notice informing you how your CV will be processed.

Use of Volvelle Ltd website

The Volvelle Ltd website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the Volvelle Ltd website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. The Volvelle Ltd website also uses cookies and web beacons. It does not track users when they cross to third party websites, does not provide targeted advertising to them, and therefore does not respond to Do Not Track (DNT) signals.

#### Use of Cookies and web beacons

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using the Volvelle Ltd website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

#### When and how we share information with others

The personal information the Volvelle Ltd collects from you is stored in one or more databases or clouds hosted by third parties located in the European Union or other countries where these service providers operate. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval.

We do not reveal your personal data to third-parties for their independent use unless: (i) you request or authorize it; (ii) the information is provided to comply with applicable laws (for example, to comply with a search warrant, subpoena or court order, KYC, anti-money laundry regulations or tax and employment duties), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (iii) the information is provided to our agents, vendors, service providers, companies of the Volvelle Ltd, that perform functions on our behalf; (iv) to address emergencies or acts of God; or (v) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf. We may also gather aggregated data about our customers, suppliers and website users and disclose the results of such aggregated (but NOT PERSONALLY IDENTIFIABLE) information to our partners, service providers, principals, advertisers and/or other third parties for marketing or promotional purposes.

The Volvelle Ltd website may direct you to social media pages as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from the Volvelle Ltd website through these services, you should review the privacy policy of that service. Please note, if you are a

member of a social media site, the interfaces may allow the social media site to connect your site visit to your personal data.

#### Transferring personal data from the EU to other countries

The Volvelle Ltd would transfer your personal data outside the EU only if: (i) you gave your consent; (ii) necessary to perform a contract with you; or (iii) necessary to fulfil a compelling legitimate interest of the Volvelle Ltd in a manner that does not outweigh your rights and freedoms. The Volvelle Ltd endeavours to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with the Volvelle Ltd and the practices described in this Privacy Policy.

#### Security of your personal data

To help protect the privacy of data and personally identifiable information you transmit through use of this website, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data only to those employees or third parties (processors, government, banks, auditors, etc) who need to know that information in order to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities, and we conduct internal audits to check our methods and procedures. The Volvelle Ltd also lessens the risk to your rights and freedoms by minimizing to the strictly necessary the collection and storage of sensitive information about you.

#### Data storage and retention

Your personal data is stored by the Volvelle Ltd on its servers, and on the servers of the cloud-based database management services the Volvelle Ltd engages, located in the European Union or any other place these service providers operate. The Volvelle Ltd retains data for the duration of the employees', customers', suppliers', visitors' business relationship with the Volvelle Ltd and in some cases the retention period will be subject to applicable laws and regulations. For Job Seekers please see related section. For more information on where and how long your personal data is stored, as well as on your rights of erasure and portability, please contact the Volvelle Ltd GDPR designated person at [gdpr@fameline.com.cy](mailto:gdpr@fameline.com.cy)

#### Changes and updates to the Privacy Policy

This Privacy Policy and our Terms of Use is expected to change during the conduction of our business. We reserve the right to amend the Privacy Policy and Terms of Use at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy and Terms of Use at this website. We may e-mail periodic reminders of our notices and terms and conditions but you should check our website frequently to see the current Privacy Policy and Terms of Use that is in effect and any changes that may have been made to it.

#### Your agreement with this Privacy Policy

By using this website, you agree to the terms and conditions contained in this Privacy Policy and Terms of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use this website or any Volvelle Ltd benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Policy and Terms of Use, or any other agreement we have with you, will be governed by the laws of

Cyprus. You also agree to arbitrate such disputes in Limassol, Cyprus where the Volvelle Ltd holds its headquarters and to abide by any limitation on damages contained in any agreement we may have with you.

Questions, concerns, requests or complaints

Please contact the Volvelle Ltd GDPR designated person at addresses provided above.