

	OESTERREICHISCHER LLOYD SEEREEDEREI (CYPRUS) LTD.	
	02.06 - DATA PROTECTION POLICY.	Issue date: 01.01.2022

1. Introduction

This policy concerns solely the data of persons; not any other technical or operational data.

OEL maintain data files, electronic and paper, of ships' personnel who provided these data upon signing a contract of employment with OEL.

OEL shall never use such data for any other purpose than for the proper operation of managed ships, i.e., for fulfilling contractual and/or legal obligations.

2. Legal Requirements

Since May 2018 the General Data Protection Regulation (GDPR) of the European Union is in force and OEL is fully in compliance with.

3. Resulting Principles of Data Protection

Lawfulness, Fairness, Transparency: OEL collect and process data only in a lawful way. i.e., the data were obtained with the consent of their owners or by a contract or because required by law.

Purpose Limitation: Data are only collected as necessary for pursuing a proper ship management; i.e., for administration of OEL contractual and legal obligations, as well as for legitimate interests.

Data Minimisation: Data are deleted when they are no longer needed. However, Cyprus Legislation require keeping the data of ex-employees for 6 years (tax law), respectively for 5 years (Anti Money Laundering law) after the end of employment.

Accuracy: Data are updated almost daily. Wrong entries, when detected, are corrected at once.

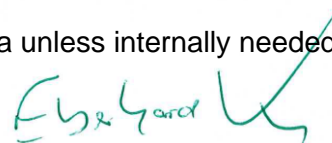
Storage Limitation: Personal data shall not leave OEL office unless for a certain legitimate purpose, same are never exported in number from our IT system to anywhere.

Only in single cases when required for efficient operations, personal data may be handed over to authorized officers of the Flag Administration, to OEL P&I insurance or to a concerned crewing agent, port agent or medical institution.

OEL employees are not allowed to copy personal data in any way.

Integrity and Confidentiality: Employees entrusted with maintaining OEL data files are committed to warrant correctness and completeness.

Employees must not propagate any personal data unless internally needed for OEL operations.



Capt. Eberhard Koch
CEO & Chairman