

FREIGHT CUSTOMERS – PRIVACY NOTICE

Finnlines Plc (“**Finnlines**” or “**we**”) is committed to protecting the privacy of your personal data. This Privacy Notice is applicable to our potential, current and former freight customers. This Privacy Notice explains how we collect and use the personal data of our freight customers and what rights our freight customers have under applicable data protection laws, including the EU General Data Protection Regulation (2016/679, “**GDPR**”).

Kindly note that this Privacy Notice may be updated from time to time.

1 Controller and Contact Information

Controller’s name: Finnlines Plc;

Business ID: 0201153-9;

Address: Komentosilta 1, 00980 Helsinki, Finland.

Should you have any questions regarding the processing of personal data or if you wish to use your rights under applicable data protection laws, please contact us by e-mail at the following address: dataprivacyofficer@finnlines.com.

2 Purposes and Legal Bases for Processing of Personal Data

We process personal data for the following purposes:

(1) Management of Customer Relations

We process personal data relating to the management and administration of customer relations. The processing of personal data is necessary for the performance of a contract to which the freight customer is a party, including offering, selling, delivering, providing and invoicing Finnlines’ products and services as well as managing the customer relations in accordance with the applicable agreements, offers and terms and conditions (GDPR Art. 6(1)(b)).

For this purpose, we collect and process the following personal data:

- Identification data (such as name, title or position);
- Contact details (such as address, email address, and phone number);
- Preferred language;
- Customer data (such as customer number); and
- Customer feedback, when this information is voluntarily provided by the customer.

This personal data is strictly required for entering into an agreement with Finnlines, unless otherwise indicated above.

(2) Provision of Services

Each driver or representative of the freight customer has to provide identifying information before entering our vessels or taking delivery of the goods at our premises. Therefore, we process personal data relating to drivers or other representatives of the freight customer when they check-in or take delivery of the goods. The processing of personal data in this case is necessary for the performance of a contract to which the respective freight customer is a party, including customer related access rights allowing the drivers or other representatives of the freight customer to check-in or take delivery of the goods (GDPR Art. 6(1)(b)). For this purpose, we process the personal data described above in Section (1.1).

We collect and process personal data relating to the drivers or other representatives of the freight customer when they check-in. The processing in connection with check-in is necessary for the purposes of identifying all passengers onboard as well as to provide the journey and services on our vessels. If the driver or other representative of the freight customer has enrolled in our other services, we will process such data provided during booking in order to provide the requested other service (for instance specified cabin or special assistance). The processing of personal data is based on our legitimate interest in providing the freight customer the requested services, as agreed with the freight customer. This processing is based on Art. 6(1)(f) of the GDPR.

For this purpose, we process the following personal data:

- Identification data (such as name, gender, date of birth, nationality)
- Contact details (such as postal address, email address and phone number);
- Check-in data (such as booking number, shipper ID, voyage data, cargo data and travel documents);
- Service data (such as requested specific services on the vessel); and
- Preferred language.

This personal data is strictly required for the provision of our services.

(3) Marketing and Communications

We collect and process personal data of freight customers and potential freight customers for the purposes of designing, developing and implementing our business, customer relations and customer service, and the products and services offered to our customers. We also process the data in order to conduct statistics, analysis and surveys. The legal basis for the processing of personal data is Finnlines' legitimate interest to develop and improve our services and business activities and enable their implementation, implement effective marketing that is interesting to the customers, as well as to offer and develop customer service and process customer feedback. This processing is based on Art. 6(1)(f) of the GDPR.

Further, we process personal data for directing marketing and communications to the freight customers and potential freight customers, such as giving information on benefits and providing traffic notifications and newsletters. We also process personal data for the purposes of direct marketing and creating profiles to optimize direct marketing. We may utilise subcontractors for communication and marketing purposes. The legal basis for the processing of personal data in these cases is the freight customer's consent to the processing of their personal data for one or more specific purposes. This processing is based on Art. 6(1)(a) of the GDPR.

For this purpose, we process the following personal data:

- Identification data (such as name, title or position);
- Contact details (such as address, email address, and phone number);
- Customer data (such as customer number, contracts and utilised services); and
- Preferred language.

When the processing of personal data is based on consent, the freight customer or potential freight customer may withdraw their consent at any time. The consent to electronic direct marketing may be withdrawn by clicking the link at the bottom of each marketing email or by following the instructions in the mobile marketing message. The consent can be also withdrawn by contacting the freight customer service.

Further, the freight customer can prohibit the collection of personal data for the purposes of profiling by contacting Finnlines freight customer service. This information is not mandatory, and the freight customer can object to the processing.

(4) Passenger Record

Further, we collect and process personal data relating to the users of our services to fulfil our legal obligation to count and maintain a register of ship passengers in accordance with the Finnish Act on Registration of Ship Passengers (1038/2009) and respective EU Directives (98/41/EC and 2017/2109/EU). This processing is based on Art. 6(1)(c) of the GDPR and Section 6(1)2) under the Finnish Data Protection Act (1050/2018) in case special categories of personal data is processed.

For this purpose, we collect and process the following personal data of the drivers or other representatives of the freight customer:

- Identification data (such as name, gender, date of birth, and nationality);
- Contact details (such as postal address, email address, and phone number);
- Any requirement for special assistance when this information has been voluntarily provided by the user;
- Contact number in case of emergency when this information is voluntarily provided by the user.

This information is strictly required by law, unless otherwise indicated above.

(6) Other Legal Obligations and Legal Proceedings

When the driver or other representative of our freight customer uses our services onboard, we disclose their personal data to port authorities or private port organisations and other competent public authorities when required by law or by authority or court decision. Such disclosure may also be based on consent if required by local law. This processing is based on legal obligation under Art. 6(1)(c) of the GDPR or on the freight customer's consent under Art. 6(1)(a) of the GDPR.

Further, we may process the freight customer's personal data to comply with local laws, such as accounting laws, or in the event of a legal claim or complaint, including regulatory investigations or legal proceedings. This processing is based on legal obligation under Art. 6(1)(c) of the GDPR or on our legitimate interest for the establishment, exercise, or defence of legal claims under Art. 6(1)(f) of the GDPR.

This information is either strictly required by law or necessary to pursue our legitimate interest.

3 Retention Periods for Personal Data

Personal data will be retained for as long as is necessary to fulfil the purposes described above in section 2. Therefore, the retention period will depend on the data concerned and its purpose of use. The retention periods are determined in accordance with the following criteria:

- Personal data related to freight customer relations will be retained during the customer relationship and two (2) years thereafter. The contract and service data will be retained for ten (10) years.
- Personal data related to check-in and other requested services will be retained until the check-in is performed by the driver or other representative of the freight customer.
- Personal data related to check-in, identification and other requested services may be transmitted to other operating systems of Finnlines, when it is necessary to provide these

services, and retained in such other systems at least until the requested services have been produced and completed by Finnlines. The more specific retention periods for these other systems are as follows: Personal data processed in our two enterprise resource planning system will be destroyed within seventy-two (72) hours after the vessel has safely completed its voyage.

- Personal data related to our legitimate interest will be retained for ten (10) years.
- Personal data related to marketing will be retained, provided that the consent has not been withdrawn, for ten (10) years. The withdrawn consent or prohibition related to marketing and profiling will be destroyed within three (3) years after the consent was withdrawn or prohibition given.
- Personal data for the purpose of passenger records will be retained as long as required by the applicable legislation. The passenger records (a list of persons on board) will be destroyed within seventy-two (72) hours after the vessel has safely completed its voyage, but no later than sixty (60) days from the vessel's departure, unless such personal data is necessary for a longer period of time due to search or rescue operations or accident investigations.
- Personal data related to service provision may be retained even after the respective contract term if required by local laws, such as accounting laws, or in the event of a legal claim or complaint, including regulatory investigations or legal proceedings.

4 Regular Sources of Data

We collect personal data directly from the freight customer and the potential freight customer, when the customer is tendering, negotiating or entering into an agreement with us and when the customer's representatives check-in or use our maritime transport services. We also collect data from the party booking the shipment on behalf of the freight customer. Further, personal data of potential freight customer can be collected from opt-in digital newsletters and surveys.

5 Data Disclosures

Personal data may be disclosed to public authorities, such as port authorities or private port organisations, customs and border guards, the police and traffic authorities, when required by law or by authority or court decision. Such disclosure may also be based on the freight customer's consent.

Shipping documents containing personal data may be disclosed to shipper or receiver or their representatives in order to complete the maritime transport service provided by us.

Further, we may use third-party ICT service providers for ICT support and maintenance purposes. These service providers process personal data on behalf of us and in accordance with our instructions. We ensure that personal data processed by the respective service providers are processed in accordance with appropriate confidentiality and data processing agreements and applicable data protection legislation.

6 Data Transfers Outside of the EEA

Personal data is processed only in the EU/EEA.

7 Principles of How the Personal Data is Secured

Personal data will be processed lawfully, fairly and in a transparent manner, collected for specified, explicit and legitimate purposes, and will not be further processed in a manner that is incompatible

with said purposes mentioned in this Privacy Notice. We will only process adequate and relevant personal data, limited to what is necessary in relation to the purposes for which it is processed.

We use appropriate technical and organisational measures designed to protect the personal information that are collected and processed. The measures used provide an adequate level of security for the processing of the personal data.

Only individuals, who due to their duties as employees are authorised to access the personal data, are entitled to process the personal data. The personal data is protected by firewalls, access control (personal usernames and passwords) and other adequate technical means.

8 Rights of Data Subjects

You as a data subject have a right to receive information on whether your personal data are being processed and if such data are processed, you have a right to access your data. You also have a right to ask for your data to be rectified or deleted or for the processing to be restricted within the limitations set out in and in accordance with applicable data protection legislation. Further, under the conditions laid out in the applicable data protection legislation, you have a right to object to the processing of your personal data as well as a right to data portability.

Where the processing is based on your consent, you have the right to withdraw your consent at any time. Please notice that a withdrawal of your consent will not affect the lawfulness of the consent-based processing taking place before your withdrawal of consent. For more information on your right to withdraw your consent or object to the processing, please see Section (2.3) above.

Any request concerning exercising your rights shall be made to Finnlines' Data Protection Officer by email at the following address: dataprivacyofficer@finnlines.com.

You are entitled to lodge a complaint with a supervisory authority regarding the processing of your personal data, if you are dissatisfied with how your personal data is processed. The supervisory authority in Finland is the Data Protection Ombudsman (www.tietosuoja.fi).