

PRIVACY STATEMENT

1 General information and definitions

This privacy statement (“**Privacy Statement**”) specifies how the entities of Oceanco (Alblasserdam Yachtbuilding B.V., Mercury Yacht Construction B.V., and Oceanco S.A.M., hereinafter referred to as “**Oceanco**”, “**we**”, “**us**”, “**our**”) processes personal data of Employees, job applicants, persons who perform work for Oceanco on a temporary/secondment basis, self-employed workers without employees, and employees of Third Parties who carry out activities at the premises of Oceanco on the basis of a contractual obligation, in the context of our products (“**Products**”) and our website <www.oceancoyacht.com> (the “**Website**”).

In this Privacy Statement the following terms have the following meanings;

Consent of the Data Subject: any free, specific, informed and unambiguous expression of will with which the Data Subject accepts the Processing of his/her Personal Data by means of a declaration or unambiguous active conduct;

Controller: Oceanco, specifically Alblasserdam Yachtbuilding B.V.;

Data Leak: a breach of security that inadvertently or unlawfully results in the destruction, loss, modification or unauthorized disclosure or unauthorized access to transmitted, stored or otherwise processed Personal Data.

Data Subject: the person to whom Personal Data relates;

Driver Visitor: any individual who enters the premises primarily for the purpose of driving a vehicle for or on behalf of the company, including delivery personnel, transport operators, or other drivers providing services to the Controller.

Employee: anyone who is employed by the Employer for a fixed or indefinite period on the basis of an employment contract;

Employees of Third Parties: anyone who carries out activities at the premises of Oceanco on the basis of a contractual obligation;

Employer: Oceanco (an entity incorporated under the laws of the Netherlands and registered in the Netherlands with the Dutch Chamber of Commerce under registration number 24337487), and its affiliated entities, subsidiaries, and group companies (hereinafter referred to as Oceanco). For the purposes of this Privacy Statement, all references to the Employer apply to the entire group of entities, and personal data is processed by any of these entities in accordance with this Privacy Statement;

Filing System: any structured set of Personal Data that is accessible according to certain criteria, irrespective of whether this is entirely centralized or decentralized or has been disseminated on functional or geographical grounds;

GDPR: the General Data Protection Regulation (*Algemene Verordening Gegevensbescherming*);

Personal Data: any information concerning an identified or identifiable natural person;

Processing: any action or whole of actions concerning Personal Data, including the collection, transmitting, recording, dissemination, organizing, making available, storing, assembling, updating, combining, modifying, blocking, retrieving, erasing, consulting, using and destroying;

Recipient: the person to whom Personal Data are provided;

Third Party: anyone other than Data Subject, the Controller, the Employer or any person authorized to process Personal Data under the direct authority of the Controller or the Employer;

2 Who is responsible for the processing of your personal data?

Oceanco is responsible for the processing of personal data as outlined in this Privacy Statement. Oceanco therefore acts as data controller within the GDPR. The Website is owned and operated by Oceanco.

3 Which personal data do we process?

In providing the Website, our Products and in relation to Data Subjects, we may process the following personal data:

Personal data of whom?	Types of personal data	Purpose (see below)
Website visitors	Data collected through cookies: a. IP address (anonymized); b. Cookie information as mentioned in our cookie statement ("Cookie Statement").	2, 7, 8, 9
Potential customers	Data from individuals or companies who shared their contact information with us: a. First and last name; b. Contact information (e.g. (company) email address and (company) phone number); c. Job title; d. Company; e. Address; f. Country.	1, 3, 5, 7, 8, 9
Customers	Data required to enter into a contract with the customer, for the use of our Services by the customer and data generated when using our application, i.e.: a. First and last name; b. Contact information (e.g. (company) email address and (company) phone number); c. Billing information; d. Billing name and address; and e. VAT number.	1, 2, 4, 5, 7, 8, 9

Job applicants	Data required to process an application and to contact a job applicant after the application, i.e.: a. name, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number, e-mail address and similar data required for communications, as well as the bank account number of the Data Subject; b. a personnel number containing no information other than that referred to under a; c. nationality and place of birth; d. data concerning training programs, courses and internships taken or to be taken; e. data concerning the job that was applied for, such as branch/position, resume and motivation; f. data on the nature and content of the current/previous employment and its termination, for example via LinkedIn; g. other data with a view to performing the duties, which are provided by the Data Subject or known to him/her; h. data, other than those referred to under a to g, the Processing of which is required pursuant to or necessary due to the application of another law.	3, 6, 8, 9
Personnel Administration	Oceanco processes Personal Data of employees for the administration and execution of the employment relationship, i.e.: a. name, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number, e-mail address and similar data required for communications, as well as the bank account number of the Data Subject; b. a personnel number containing no information other than that referred to under a; c. the citizen service number (burgerservice-nummer); d. nationality and place of birth; e. data concerning training programmes, courses and internships taken or to be taken; f. data concerning the position or the former position, as well as the nature, content and termination of the employment; g. data with a view to the administration of the presence of the Data Subjects at the place where work is carried out and their absence in connection with leave, reduction of working hours, birth or illness, with the exception of data on the nature of the illness; h. data that is included in the interests of the Data Subjects, for the purpose of their working conditions; i. data that is important for the guidance of Data Subjects in the event of sick leave/incapacity for work;	1, 3, 5, 8, 9

	j. data, including data concerning family members and former family members of the Data Subjects, that is necessary in view of an agreed condition of employment, severance pay and pension administration; k. a telephone number that can be called in the case of an emergency; l. data with a view to organizing a personnel assessment and career counselling, insofar as these data is known to the Data Subjects; m. data, other than those referred to under a to l, the Processing of which is required pursuant to or necessary in view of the application of another law or regulation.	
Payroll Administration	Data required to process payroll administration, i.e.: a. name, first names, initials, title, gender, date of birth, address, postal code, place of residence, telephone number, e-mail address and similar data required for communications, as well as the bank account number of the Data Subject; b. a personnel number containing no information other than that referred to under a; c. the citizen service number; (except for hirers) d. nationality and place of birth; e. data for the purpose of the calculation, recording and paying of salaries, allowances and other sums of money and rewards in kind to or for persons referred to in the first paragraph; f. data for the purpose of the calculation, recording and paying of salaries and allowances for the Data Subject; g. data, including data concerning family members and former family members of the Data Subjects, that is necessary for the purpose of an agreed condition of employment, severance pay and pension administration; h. data other than those referred to under a to g, the Processing of which is required pursuant to or necessary with a view to the application of another law.	1, 3, 5, 8, 9
Compliance Administration	The Personal Data we process for compliance administration may include: a. name, first names, initials, gender, date of birth, telephone number, e-mail address and similar data required for communications; b. nationality and place of birth; c. data for the purpose of determining social security; d. information with a view to verifying that all necessary documents are present which justify the carrying out of work at the premises of Oceanco;	1, 3, 5, 8, 9

	e. the duration of the work to be carried out. f. data from the contractual client of the Data Subject.	
Entrance Records	We process Personal Data relating to site access, i.e.: a. date of authenticity check of the identity document; b. first name and surname; c. date of birth; d. passport photo; e. identity document number; f. validity date identity document; g. (for Driver Visitors) mobile phone number and vehicle registration number. Only the name and surname are recorded for the registration of the Drivers Visitor group and manual identification is performed by security.	8, 9

4 What are the purposes and legal grounds of processing?

We only process your personal data where we have a valid legal ground to do so. The GDPR specifically states these legal grounds. In the case of Oceanco these are usually: performance of a contract, legitimate interest in running our normal business activities, compliance with a legal or regulatory obligations, and in some cases your consent.

Where you are a customer or otherwise have a contract with us, we primarily process your personal data for the purpose of providing our Products and fulfil our contractual obligations. We also process personal data where this is necessary for our legitimate business interests. We will only process personal data based on legitimated interest if our interests outweigh the privacy interests of the person to whom the data relates. In that case, the legitimate interests of Oceanco correspond to the purposes set out below. For further information on the balancing of interests in a specific case, please contact us using the contact details at the bottom of this Privacy Statement. It may also be the case that Oceanco has to process personal data to comply with an applicable legal or regulatory obligation, for example to meet applicable minimum retention periods.

Oceanco will inform you in a specific situation if providing personal data is a legal or contractual obligation or necessary condition for entering into an agreement. We will also inform you of the possible consequences of not providing such data.

Oceanco processes the personal data included in subsection 3 for the following purposes and on the basis of the relating legal grounds:

#	Purpose	Legal ground
1	To enter into and for the performance of agreements, with regard to our Products.	Performance of contract (Article 6(1)(b) GDPR)
2	To offer, maintain, secure and improve the Website and our Products.	Legitimate interest (Article 6(1)(f) GDPR)
3	To have and maintain contact with you, for example, through our contact form and to provide customers' support.	Legitimate interest (Article 6(1)(f) GDPR)
4	To establish and maintain contact with (potential) customers and (potential) other business relations.	Legitimate interest (Article 6(1)(f) GDPR)

5	Internal business and management operations, for example financial processing.	Legitimate interest (Article 6(1)(f) GDPR); legal obligation (Article 6(1)(c) GDPR)
6	To assess whether you are a viable candidate for our company and to further process the application.	Performance of contract (Article 6(1)(b) GDPR); legitimate interest (Article 6(1)(f) GDPR); consent (Article 6(1)(a) GDPR, but only to keep your personal data for a longer period)
7	Marketing activities, including social media.	Consent (Article 6(1)(a) GDPR)
8	To establish, exercise and defend our rights.	Legitimate interest (Article 6(1)(f) GDPR)
9	To comply with applicable laws and regulations, including tax legislation (<i>Algemene wet inzake rijksbelastingen</i>), various statutory retention periods and the pension act (<i>Pensioenwet</i>), or an injunction or request from authorized regulators or other government agencies.	Comply with a legal obligation (Article 6(1)(c) GDPR); legitimate interest (Article 6(1)(f) GDPR)

5 How do we obtain your personal data?

We obtain your personal data in various ways:

- **Provided by you.** Some personal data we receive straight from you. For example, if you apply for a job position.
- **Through the use of the Website or our Products.** For example, we may process your IP address or data about your use of our application (log data). In some circumstances we process personal data because we are legally required to retain or process it for a longer period.
- **Obtained from third parties.** We could also obtain personal data from other persons or external parties. In principle, we only make use of this possibility in two scenarios:
 - Website visitors: we may receive information about you from third parties, in the context of the cookies and similar technologies we use. Further information on this is included in our Cookie Statement.
 - Applicants: we may obtain information from a referral included by you in your application.
- **Derived.** Certain personal data we do not receive directly but can be derived from the information already in our possession. For example, information about your preferences and interests.
- **Public sources.** We may also receive personal data through public sources, such as information from a public LinkedIn profile or a website.

In principle, you are under no legal obligation to provide any information about yourself to us. However, refusal to supply certain information could have a negative influence on, for example, your experiences on or functionality of our website. If the provision of certain personal data is a legal or contractual obligation or an essential requirement for concluding an agreement with us, we will separately provide additional information about this as far as this is not clear in advance. In this case we will also inform you about the possible consequences if this information is not provided.

6 Under which circumstances and with whom do we share your personal data?

We only share your personal data with third parties if:

- This is necessary for the provision of a service or the involvement of the third party. Sub-contractors, for example, will in principle only get access to the personal data that they require for their part of the service provision.
- The persons within the third party that have access to the personal data are under an obligation to treat the personal data confidentially. Where necessary this is also contractually agreed upon.
- The third party is obliged to comply with the applicable regulations for the protection of personal data, for instance because we have concluded an agreement with this party. This includes that the party is obliged to ensure appropriate technical and organizational security measures, and that any transfer of personal data to countries outside the European Economic Area (“EEA”) is adequately legitimized.

We could share your personal data on a need-to-know basis with the parties mentioned below. In this context, "need-to-know" means that a party only gets access to personal data if and insofar as this is required for the professional service provided by this party.

- Authorized persons, employed by Oceanco, who are involved with the processing activity concerned. Such as, the members of the sales team you are in contact with.
- Authorized persons, employed by service providers / sub-contractors engaged by Oceanco, who are involved with the processing activity concerned.
- Hostnet, the provider of Oceanco’s hosting environment.
- Authorized persons, employed by parties in the private sector with whom we may share certain personal data.
- Authorized government institutions. Such as, courts, police, and law enforcement agencies. We may release information about our Website visitors, including IP address, when legally required to do so, at the request of governmental institutions conducting an investigation or to verify or enforce compliance with the policies governing our website and applicable laws. We may also disclose such user information whenever we believe disclosure is necessary to protect the rights, property or safety of Oceanco, or any of our respective business partners, customers or others.
- Aggregate Information. We may also disclose non-identifying, aggregated user statistics to third parties for a variety of purposes, including improving our Website.
- Mergers and acquisitions. We may transfer or provide your personal data to a buyer or potential buyer in the event of a merger or acquisition (potential or prospective) of all or part of our business or assets. In the event of such a transfer, we will take all steps reasonably expected of us to ensure that the receiving party processes your information in accordance with this Privacy Statement.

7 To which countries do we transfer your personal data?

Transfers outside the EEA and UK

At present, we do not transfer Personal Data to countries outside the European Economic Area (“EEA”) or the United Kingdom (“Third Countries”). All Personal Data that we process is stored and handled within the EEA and/or the UK.

If, in the future, a transfer of personal data to a country outside the EEA or United Kingdom would be required, we will ensure that such transfer takes place in compliance with Chapter V of the GDPR and other applicable privacy legislation.

Legitimation of transfers outside the EEA and UK

Should transfers of your personal data to a country outside the EEA or UK become necessary, they may in the first place be legitimized on the basis of a so-called adequacy decision. This is a decision in which the European Commission states that e.g. a certain country offers a level of data protection similar to the GDPR. See [this link](#) for the current list of adequacy decisions of the European Commission.

If and insofar as we transfer personal data to Third Countries to which no adequacy decision or adequacy regulation applies, we will rely upon the applicable version of the model clauses to safeguard data protection as published by the European Commission, so called standard contractual clauses ('Transfer SCCs'). If deemed required under the applicable privacy legislation, additional measures will be taken. This may concern technical, organizational and/or contractual measures. Where the UK GDPR is applicable, a UK Addendum will be added to the Standard Contractual Clauses mentioned above, as required by UK laws and regulations.

Further information on our legitimization of data transfers to Third Countries will be provided upon your request. Please use our contact details to make such a request, as stated below.

8 How do we protect your personal data?

Protecting your privacy and personal data is very important to us. Therefore, Oceanco has implemented appropriate technical and organizational measures to protect and secure the personal data we process, in order to prevent violations of the confidentiality, integrity and availability of such data.

Oceanco has internal processes according to which we safeguard an appropriate level of technical and organisational security. That includes ensuring only authorised personnel have access to that personal data and taking reasonable steps to prevent data breaches, monitoring and acting upon unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss. We also have technologies and systems in place to utilize and maintain processes aiming on safeguarding and ensuring an appropriate level of technical and organisational security.

9 What are your privacy rights?

In relation to the processing of your personal data by Oceanco, you have the following privacy rights:

- a. Right of access.** This concerns the right to request access to your personal data. This enables you to receive a copy of the data we hold about you (but not necessarily the files themselves). We will then also provide further specifics of our processing of the personal data. For example, the purposes for which we process the data, where we got it from, and with whom we share it.
- b. Right to rectification.** This concerns the right to request rectification of the data that we hold about you. This enables you to have any incomplete or inaccurate data corrected.
- c. Right to erasure.** This concerns the right to request erasure of the data. This enables you to ask us to delete or remove personal data where: (i) the data is no longer necessary, (ii) the processing activities have been objected to, (iii) the data has been unlawfully processed, (iv) the data has to be erased on the basis of a legal requirement, or (v) where the data has been collected in relation to the offering of information society services. However, we do not have to honour such request in all cases.

- d. Right to object.** This concerns the right to object to the processing of personal data where we are relying on legitimate interest as processing ground (see above). Insofar as the processing of the data takes place for direct marketing purposes, we will always honour an objection. For processing for other purposes, we will also cease and desist processing, unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or that are – for example - related to the institution, exercise or substantiation of a legal claim. If such is the case, we will inform on our compelling interests and the balance of interests made.
- e. Right to restriction.** The right to restriction of processing means that Oceanco will continue to store personal data at the request of you but may in principle not do anything further with it. In short, this right can be exercised when Oceanco does not have (or no longer has) any legal grounds for the processing of the data or if this is under discussion.
- f. Automated decision-making.** This concerns the right not to be subject to a decision based solely on automated processing, which significantly impacts you. In this respect, please be informed that when processing your data, we do not make use of automated decision-making.
- g. Right to withdraw consent.** This concerns the right to withdraw consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- h. Right to complaint.** This concerns the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work or where an alleged infringement took place. Please be referred to the website of the European Data Protection Board (“EDPB”) for an overview of the supervisory authorities and their contact details. However, we would appreciate the opportunity to deal with any concerns before the supervisory authority is approached, so please contact us beforehand.

10 **How to exercise your privacy rights?**

You can exercise the privacy rights above free of charge by e-mail via the contact details displayed below. If requests are manifestly unfounded or excessive, in particular because of the repetitive character, we have the right to either charge a reasonable fee or refuse to comply with the request. In addition, we may request specific information to help us confirm your identity before we further respond to a privacy request. Finally, we will provide information about the follow-up of the request without undue delay and in principle within one month of receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months.

11 **How long do we keep your personal data?**

Oceanco does not keep personal data for longer than is necessary in relation to the purposes for which we process the personal data. Specific retention periods that Oceanco applies are the following:

- Personnel administration/payroll accounting: the Personal Data will be erased no later than seven years after the end of employment or the activities of the Data Subject on behalf of the Controller.
- 1. Job applicant records: the Personal Data will be deleted at the request of Data Subject and in any case no later than four weeks after the application procedure has ended.

There could, however, be exceptions applicable to the general retention terms. In view hereof, shorter retention periods could apply: if an individual exercises certain privacy rights, it is possible that we retain it for a shorter period of time. Longer retention periods could also apply. In certain situations, we process personal data of individuals for a longer period of time than what is necessary for the purpose of the processing. This is for instance the case when we have to process personal data for a longer period of time:

- **Retention obligation** - to comply with a minimum retention period or other legal obligation to which Oceanco is subject based on EU law or the law of an EU member state;
- **Procedure** - personal data which is necessary in relation to a legal procedure;
- **Freedom of expression** - when further processing of personal data is necessary in order to exercise the right to freedom of expression and information; and
- **Consent** - for example: With the job applicant's consent, we retain their data for one year as of finalization of the application procedure instead of 4 weeks.

12 Contact information

If you have any questions regarding this Privacy Statement, or data collection by Oceanco in particular, please contact privacy@oceanco.nl or by using the contact information below:

Alblasserdam Yachtbuilding B.V.
 Marineweg 1, 2952 BX Alblasserdam, the Netherlands
 To the Attention of: General Counsel

13 Changes to this Privacy Statement

Occasionally, we may need to update or change this Privacy Statement. In case of important changes, we will inform you in an appropriate manner and ask you to take note of the changes made. The latest version of the Privacy Statement is always available on our Website.

This Privacy Statement was updated in January 2026.
