



1. Purpose of this Notice

This privacy notice (this “**Notice**”) aims to give you information about how the BR8 group of companies (that is, BR8 Shipping Pte. Ltd., BR8 Shipping Company Ltda. and their direct and indirect affiliates together, “**BR8 Group**”, “**us**” or “**we**”) collects, processes and treats any personal data you provide to us (including when visiting our website br8shipping.com (the “**Website**”). It is important that you read this Notice and any other notices we may provide on specific occasions, so that you are fully aware of how and why we use your personal data.

The Website is published and maintained by or on behalf of BR8 Group. Any personal data you provide to us is controlled by BR8 Shipping Pte. Ltd., a company incorporated in Singapore, whose registered address is at:

5 Shenton Way,
#20-04, UIC Building,
Singapore 068808.

2. Contacting Us

If you have any questions about this Notice or its contents, please do not hesitate to e-mail us at privacy@br8shipping.com, or contact us by post at the above address.

3.1 What personal data about you we may collect and how we use it

We only process your personal data when applicable laws allow us to. A description of the ways in which we collect, use, store and otherwise process your personal data, and the legal bases we rely on to do so (in addition to any consent you may grant to us), are set out below. Where appropriate, we have also identified our legitimate interests in processing your personal data.

Purpose and/or activity	Type of your data	Legal basis for our processing
Updates to this Notice and our Website: To notify you about changes to our Website terms or this Notice, or to ask you for feedback	Contact data Identity data Profile data	Necessary to comply with a legal or regulatory obligation
Due diligence on our counterparties: To take you on as a customer, client or supplier, including performing anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks	Contact data Identity data Profile data	Necessary for our legitimate interests, provided that your fundamental rights do not override them, and/or to comply with a legal or regulatory obligation: to know and verify the identity of our current or prospective business partners, to ensure we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities, and to ensure that you have our most up-to-date terms of business
Legal relations with our counterparties: To provide you with our services, or to receive services from you, according to	Contact data Identity data Profile data	Necessary to comply with a legal or regulatory obligation; necessary for the performance of a contract to which you



<p>agreed terms, to enable you to have a good customer/client/supplier experience, to assist in carrying through specific transactions and for maintaining our contractual and business relationship with our clients, customers and/or suppliers</p>		<p>and/or the company you represent are party</p>
<p>Events, and keeping in touch: To invite you to take part in marketing or other promotional events, or client seminars or similar events, to manage your participation in them, and to (from time to time) keep in touch</p>	<p>Contact data Identity data Profile data</p>	<p>Necessary to ensure our client and customer records are up-to-date, promoting our client and customer services, receiving feedback, improving our services and identifying ways to grow our business</p>
<p>Recruitment activities: In relation to any application you make to become our employee or consultant, to review and decide your application (including determine your suitability), communicate with you, enter into a contract with you, make arrangements for your joining, provide you with company benefits (such as medical insurance), take other steps incidental to your recruitment, and make adjustments to our human resources processes</p>	<p>Contact data Identity data Recruitment data</p>	<p>Necessary to comply with our legal obligations (such as, satisfying due diligence requirements and complying with applicable laws in our capacity as your potential employer), and/or necessary for our legitimate interests (such as, ensuring we recruit the best candidates for our roles, and that we provide our staff with the benefits they require), provided that your fundamental rights do not override them</p>
<p>Electronic and other marketing: To send you marketing (including paper and electronic marketing communications) or to contact you by other means to offer you our client and customer services</p>	<p>Contact data Identity data Profile data</p>	<p>Necessary to promote our client and customer services, identifying ways to grow our business</p>
<p>Managing our Website content: To deliver relevant Website content to you (for example, by suggesting content) and measure or understand the effectiveness of our content, and to troubleshoot, test and</p>	<p>Contact data Identity data Profile data Marketing and communications data</p>	<p>Necessary to comply with a legal or regulatory obligation and/or necessary for our legitimate interests, provided that your fundamental rights do not override them: to ensure that our Website and services remain relevant to you, and to ensure that our Website and systems are functioning as intended and are secure</p>



maintain our data and systems, and host the Website securely	Technical data Usage data	
Analysis of Website traffic: To use data analytics to improve our Website, our services, marketing, customer relationships and experiences	Technical data Usage data	Necessary for our legitimate interests, provided that your fundamental rights do not override them: reviewing how clients use and what they think of our Website, improving our Website and identifying ways to grow our business

The meaning of “contact data”, “identity data”, “marketing and communications data”, “profile data”, “recruitment data”, “technical data” and “usage data” is explained at the end of this Notice.

3.2 How we treat your recruitment applications

By making an application via our Website or by any other means, you are providing your express consent for us to use and hold your contact data, identity data and other recruitment data for as long as it is necessary to consider your application and/or to comply with any applicable law. We may occasionally process special categories of personal data about you (such as, information about your health or religion), but we do so insofar as required by applicable law or as permitted for assessing and accommodating your needs, reviewing the suitability of our workplace and adjusting our human resource processes. If you submit other information in the course of your recruitment application, such as your marital status, or information regarding your dependents, we will treat such information in the same way as your other recruitment data.

We will take all reasonable steps to ensure your recruitment application is secure and processed in accordance with this Notice. Your personal data may be processed or transferred within or outside the BR8 Group (as detailed in Sections 4.1 and 4.2 below). By providing us with your recruitment data, you acknowledge our legitimate interest in doing so, and consent to this processing and transfer.

3.3 What if you consent to marketing from us?

If you consent or have consented to receiving marketing from us (such as, electronic marketing), you may withdraw your consent at any time by contacting us at privacy@br8.com, by following an unsubscribe hyperlink in recent electronic marketing from us, and by any other means we communicate from time to time.

4.1 International transfers and disclosures of personal data within BR8 Group

Your personal data will be shared within the BR8 Group. As an international and globally active group, we share your personal data abroad between our offices located worldwide to ensure their efficient operation and to provide the highest quality of client and customer services. However, the protection of your personal data against unauthorised disclosure is a priority for us. Unless we have agreed with you otherwise (for instance, in a contract with you) or unless otherwise permitted by the applicable laws, our international offices and affiliates ensure at all times a level of data protection at least as protective as that required in the European Economic Area (“EEA”) and countries such as the UK.

4.2 International transfer and disclosures of personal data outside BR8 Group



As an international and globally active group, we may have to share your personal data from time to time with entities and persons abroad and outside of BR8 Group for the same purposes for which we collected your personal data (detailed in Section 3.1 above). This may involve transferring personal data to countries that apply laws that do not implement the same level of data protection or do not offer adequate safeguards compared to the laws applicable in the EEA and countries such as the UK. However, as far as practicable, we limit such disclosures to a minimum and implement additional protections for your personal data through use of technology (for instance, access restrictions), non-disclosure agreements and other measures. The types of entity and person with whom we may occasionally have to share your personal data include:

- (i) any person or entity to whom we are required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body;
- (ii) our professional advisers or consultants, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us;
- (iii) any financial institutions providing finance to us;
- (iv) service providers of information technology and system administration services to us; and
- (v) other external auditors, regulators or standard-setting bodies (such as, International Organization for Standardization), who may access your personal data in the course of their independent checks of our records.

4.3 Web Analytics Services

In addition to the potential recipients of your personal data listed in Section 4.2 above, this Website uses Google Analytics, web analytics services provided by Google LLC and affiliates (the “**Web Analytics Services**”). The Web Analytics Services use cookies to help us analyse how users use the Website. Technical data generated by your use of the Website (including your IP address) may be transmitted to and stored by the provider(s) of the Web Analytics Services on servers based worldwide. The Web Analytics Services will use this information for the purpose of evaluating your use of the Website, compiling reports on Website activity and providing other services to us relating to the Website. The provider(s) of the Web Analytics Services may also transfer this information to third parties, where required to do so by law, or where such third parties process the information on such provider(s)’ behalf. We understand that the Web Analytics Services will not associate your IP address with any other data held by the provider(s). By using our Website, you consent to the processing of data about you by Web Analytics Services in the manner and for the purpose set out in this Notice.

5. How we protect your personal data

We protect your personal data in accordance with applicable data privacy laws and our data privacy policies and principles. Further, we have implemented appropriate organizational and technical security measures to protect your personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto. We maintain organisational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake. We store personal data on servers with limited access located in secured facilities, and our security measures are evaluated on an ongoing basis. The servers are protected by anti-virus software and firewalls, among other measures.



6. Retention period

We only retain your personal data in a user-readable format for as long as necessary to fulfil the purposes we collected it for. To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. Your legal rights

You have a number of rights under data protection laws in relation to your personal data. You have the right to:

- (i) to be informed about how we will use and share your personal data;
- (ii) to obtain confirmation of whether we are processing your personal data, access to your personal data and information regarding how your personal data is being used by us;
- (iii) to have any inaccurate or incomplete personal data rectified. If we have disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible;
- (iv) to request that certain personal data held by us is erased, to the extent permitted by applicable laws and regulations;
- (v) to restrict the processing of your personal data (if you are disputing the accuracy of personal data, if you have raised an objection to processing, if processing of personal data is unlawful and you oppose erasure and request restriction instead or if the personal data is no longer required by us but you require the personal data to be retained to establish, exercise or defend a legal claim);
- (vi) to request, in certain circumstances, to receive a copy of your personal data in a commonly used electronic format. This right of data portability only applies to personal data that you have provided to us (for example by completing a form or providing information through our Website);
- (vii) to object to processing of personal data being carried out by us if (a) we are processing personal data based on legitimate interests or for the performance of a task in the public interest, (b) if we are using personal data for direct marketing purposes, or (c) if information is being processed for scientific or historical research or statistical purposes; and
- (viii) not be subject to a decision which is based on automated processing if this decision will produce a legal effect or a similarly significant effect on you.

If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have not been fully respected, we encourage and welcome individuals to come to us first to seek resolution of any complaint. You have a right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against us with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).

8. How changes to this notice will be made



The first version of this Notice in its updated format was issued in May 2024. The date of any more recent updates will be/is stated at the top of the Notice. The version of this Notice found on the Website (at <https://br8shipping.com/privacy-policy/>) is the most-recently published and effective version.

9.1 Cookies

Our Website uses first-party and third-party cookies to optimise your experience; the details and purpose of these cookies is listed in the table below. If unsure about the meaning of ‘cookies’, please read Section 9.2. We will ask for consent to place any cookies on your device, using a pop-up notice. If after providing consent you change your mind and wish to withdraw your consent, you may disable cookies in your browser settings or email us at privacy@br8shipping.com.

Cookie name (and type)	Cookie expiration	Purpose
Google Analytics Cookies (analytics)	Up to 2 years	Helps us maintain Website performance and measure how users interact with Website content. This includes information on traffic volumes (e.g. visits, new vs returning users), user behaviour (e.g. session time), and the source of traffic. See also Section 4.3 above for further information about web analytics services.

9.2 What are cookies?

Cookies are text files containing small amounts of information, which are downloaded to your device when you visit a website. Cookies can be either session cookies or persistent cookies. Session cookies are cookies which are deleted when you close your internet browser. Persistent cookies stay in place after you have closed your browser, for example, a cookie which tracks whether you are a new or return visitor to the Website.

9.3 Sharing tool cookies

This Website may use sharing tools, allowing you to share content through social networks, such as Facebook or X. When you use a sharing tool button, the social networking site may place a cookie on your computer. This would be a third-party cookie, set by the relevant social networking site, which we have no control over. If you have any questions about the use of these third-party cookies, you should check the relevant social networking site’s cookie policy.

10. Additional information

When we refer in this Notice to the following terms, we mean:



“Contact data”: your billing address, delivery address, email address and telephone number and any other data that would enable us to maintain our business relationship with you;

“Identity data”: your first name, middle names, maiden name, last name, marital status, title, date of birth, passport number, photographic identification, gender, company/employer details and job title;

“Marketing and communications data”: your marketing and communication preferences. We also track when you receive and read marketing communications from us and which of our events you attend, and we use this information to improve our marketing services, provide you with more relevant information and improve the quality of our marketing materials;

“Profile data”: your usernames and passwords, your interests, feedback and survey responses;

“Recruitment data”: normally includes your contact data, identity data and other information which may potentially be used to identify you as an individual, such as your education, employment history and professional qualifications. Depending on the information you submit with your recruitment application, recruitment data could also include certain special categories of personal data, such as information regarding your health, religion, or information regarding your marital status;

“Technical data”: information collected when you access our Website, including your internet protocol (IP) address, your internet service provider’s domain name, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you are using; and

“Usage data”: information about your use of our Website (including which pages you have accessed and when), our local area networking facilities (including WiFi), and similar electronic services.