

# **B.L. Williams Data Protection Policy**

Our **Company Data Protection Policy** refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle and dispose of data fairly, transparently and with respect towards individual rights.

## **Scope**

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

## **Who is covered under the Data Protection Policy?**

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or who acts on our behalf and may need access to data.

## **Policy elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- ♦ Accurate and kept up-to-date
- ♦ Collected fairly and for lawful purposes only
- ♦ Processed by the company within its legal and moral boundaries
- ♦ Protected against any unauthorized or illegal access by internal or external parties

Our data will not be:

- ♦ Communicated informally
- ♦ Stored for more than a specified amount of time
- ♦ Transferred to organizations, or countries that do not have adequate data protection policies
- ♦ Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically we must:

- ♦ Let people know which of their data is collected
- ♦ Inform people about how we'll process their data
- ♦ Inform people about who has access to their information
- ♦ Have provisions in cases of lost, corrupted or compromised data
- ♦ Allow people to request that we modify, erase, reduce or correct data contained in our databases

## **Actions**

To exercise data protection we're committed to:

- ♦ Restrict and monitor access to sensitive data
- ♦ Develop, maintain and review transparent data collection procedures
- ♦ Train employees in online privacy and security measures
- ♦ Build secure networks to protect online data from [cyberattacks](#)
- ♦ Establish clear procedures for reporting privacy breaches or data misuse
- ♦ Include contract clauses or communicate statements on how we handle data
- ♦ Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

## **What personal information we might need and why**

We may collect and process the following personal information. We may also need to collect other personal information that is not listed here:

- Your name
- Your address
- Contact information (for example address, telephone numbers, email addresses)
- Information about your age, ethnicity, gender, nationality, disability status
- Your occupation
- Your place of work
- Information about your places of residency
- Information about your identity as it relates to shipping (passport, identifying number such as TRN or SSN)

## **Protecting your information**

We have appropriate technical and organizational measures in place to protect your information.

We will handle and protect your information in line with our Data Protection Policies as follows:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained only for one or more specified and lawful purpose(s) and will not be processed in a manner that is not compatible with that purpose(s).
3. Personal data will be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
4. Personal data will be accurate and where necessary, kept up to date.
5. Personal data will not be kept for longer than necessary.
7. Personal data will be protected against unauthorized or unlawful processing, accidental loss, damage or destruction.
8. Personal data will be disseminated and destroyed in keeping with best business practices. Paper data will be shred and electronic information will be wiped clean from drives. Back-up copies will be destroyed or erased.

## **Sharing your personal information**

We may need to share your information with third parties such, as but not limited to, local and foreign Government agents, shipping and forwarding agents. This may be for a variety of reasons but will always be to enable us to undertake our functions as contracted by you or to comply with our legal or regulatory obligations.

When your personal information is shared it will be done so in line with the best business practices. You are entitled to know why and how we are sharing your personal information and the organization or individual receiving your personal information will be required to protect your information.

## **Logging and recording of communications with you**

We may log communications between you and us for the purposes described earlier in this statement. We may also record telephone calls you make to our offices for quality and training purposes.

## **Conditions under which personal data can be processed**

1. The data subject has given his/her consent to processing. [This consent must be fully informed and freely given].
2. The processing is necessary for the performance of a contract to which the data subject is a party, [for example, a shipping or storage contract].
3. The processing is necessary for compliance with a legal obligation to which the data controller is subject, other than an obligation imposed by contract.
4. The processing is necessary in order to protect the vital interest of the data subject. [applies to emergency situations only]

## **Review Frequency**

Annually

## **Policy Owner**

BLW Chief Compliance Officer Data Protection Policy © 2018 BLW and/or its subsidiaries. All Rights Reserved

## **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Our data protection provisions will appear on our website.