

## **DATA PRIVACY NOTICE**

### **Privacy Policy**

This policy covers the website at Crew & Ships Management Inc. (the "Site") and explains our information practices, data security practices, defines your privacy options and describes how your information is collected and used by CMI.

By using this Site, you agree to the collection and use of information in the manner described by this policy. We shall have the right at any time and without prior notice, at our sole discretion, to revise this policy. Such revisions and additions shall be effective immediately upon notice, which may be given by any means, including but not limited to posting the revised or additional terms and conditions on this Site. You are responsible for reviewing the Site periodically for any modification to this policy.

### **Personal Information we collect**

This policy applies to all information collected on this Site and any information you provide to us as a client of CMI. In addition, it applies to any applicants who provide resumes, references, applications for employment, or any other information when applying for positions with our clients.

You can generally visit the Site without revealing any personally identifiable information about yourself. We do not collect personal information from our Site visitors without the Site visitor providing us with this information as set forth in this Privacy Policy.

If you wish to receive company or product information or request an online demonstration of the Services, you can do so by completing Contact Us form on our Site that asks for your name, company name, email address, and phone number. You can also voluntarily provide comments to us when submitting the request form. We use the information from the request form to deliver the requested information and/or provide you an overview of our services.

In order to become a registered applicant or employer, we require you to create a user account. Information we collect to register a user account will include, but is not limited to, the following personally identifiable information: first and last name, user name, password, and email address. The personal information we collect on behalf of our clients from our clients' applicants will be dictated by our clients as they configure online employment applications.

### **Non-Personal Information we may collect**

In addition to the personal information you supply, we may collect certain information to evaluate how visitors use our Site. We collect data to make our service work better for you by improving the design of the Site, by providing personalization of the Site and to evaluate the performance of our marketing programs. The technologies we use to gather this non-personal information may include IP addresses, cookies, clear gifs, browser detection, and weblogs. We further use this information to provide a better experience on our website and to give us useful business information.

"IP" addresses define the Internet location of computers and help us better understand the geographic distribution of our members and manage the performance of the Site. "Cookies" are tiny files placed onto the hard drive of your computer when you visit the Site, so we can immediately recognize you when you return to the site and deliver content specific to your interests. You may modify your browser preferences to accept all cookies, be notified when a

cookie is set, or reject all cookies. Please consult your browser instructions for information on how to modify your choices about cookies.

We may detect the type of web browser you are using to optimize the performance of our website and to understand the mix of browsers used by our clients and visitors. To learn about how people use our site, we examine weblogs, which show the paths people take through our site and how long they spend in certain areas. We may also track and analyze non-identifying and aggregate usage and volume statistical information from our visitors and clients.

### **How we use Information**

Our primary goal in collecting your client information is to provide you with a personalized, relevant, and positive experience with the Site. We use the information that we collect to set up Services for individuals and their organizations. We may also use the information to contact clients to further discuss client interest in our company, the Services that we provide, and to send information regarding our company or partners, such as promotions and events.

CMI collects information under the direction of its clients, and has no direct relationship with the individuals whose personal data it processes. Client email addresses and any personal client information will not be distributed or shared with any third parties. We may email information regarding updates to the Service. Except as we explicitly state at the time we request information, or as provided for in the CMI Terms of Use, we do not disclose to any third-party the information provided.

### **Data Security**

The security of your personal information is important to us. We follow industry-standard technical and organizational measures to protect the security of our users' and applicants' personal information. Our software is hosted on secure, fire-walled servers in an SSAE-16 compliant data center. We use 256-bit SSL (Secure Socket Layer) encryption for all data transfers. All client data is backed up daily. Access to our clients' data is controlled by usernames and passwords, both of which are further encrypted by a complex hashing routine. Clients are responsible for maintaining the confidentiality and security of their usernames and passwords. Only authorized CMI employees have access to clients' data and we never share that data with other clients.

However, CMI cannot guarantee that unauthorized third parties will never be able to defeat these measures or use your personally identifiable information for improper purposes. Therefore, you should be aware that when you voluntarily display or distribute personally identifiable information, that information could be collected and used by others. CMI is not responsible for the unauthorized use by third parties of information you post or otherwise make available publicly.

### **Disclosure of Information**

We reserve the right to disclose your personally identifiable information: (a) if we are required to do so by law, regulation or other government authority or otherwise in cooperation with an investigation of a governmental authority, and/or comply with a judicial proceeding, court order or legal process (b) to enforce the CMI Terms of Use or Master Subscription Agreement or (c) to protect our rights and the safety of users of our Site and our Services. It is also possible that CMI would sell all or substantially all of its assets and business. In any transaction of this kind, client information, including your personally identifiable information, may be among the assets that are transferred. If we decide to do transfer your personally identifiable information, you will be notified by email.