



# Privacy Notice

## Introduction

Grieg Star Philippines, Inc. (“**We**”, “**GSP**”, or the “**Company**”) is a shared services company under the ownership of Grieg Maritime Group. We were established in 2015 with an objective to provide timely and accurate support and service solutions to the companies in the Grieg Maritime Group. We offer services in Accounting, Marine Competence Development, Business Controls, Project Management, Maritime Human Resources, Purchasing, Software System Support, Shore Human Resources & Office Administration.

As a company which relies on Personal Information as part of our business model, we value your trust and are committed to safeguarding your privacy. In this regard, GSP ensures strict compliance with Republic Act No. 10173, otherwise known as “*The Data Privacy Act of 2012*” (“**DPA**”), its Implementing Rules and Regulations (“**Rules**”), and the various issuances and policies of the National Privacy Commission (“**NPC**”) (collectively, the “**DPA and Rules**”).

In this Privacy Notice, you will know how we handle your Personal Information and how we protect them. We want you to know what data we have on you, how you can access your Personal Information, and when necessary, how you can correct or have the said data deleted. In case you have a complaint or concern regarding your privacy, we undertake to settle the same immediately.

## Scope and Application

We may collect your Personal Data, which can either be Personal Information and/or Sensitive Personal Information, when you avail of our services, contact us via our email and social media accounts, or when you submit to us your curriculum vitae, application letters, and other similar, related, or supporting documents relating to your employment or availment of GSP’s services.

By submitting your Personal Information to GSP through these means, or by availing of GSP’s services, you consent to the processing of your Personal Information as stated in this Privacy Notice. Under the DPA and the Rules, “*processing*” includes the collection, recording, organization, storage, updating, modification, retrieval, consultation, use, consolidation, blocking, erasure, or destruction of data.

If you do not agree with any provision of this Privacy Notice, please do not provide GSP with your Personal Information. However, GSP may not be able to provide you with the services that require the use of such Personal Information.

### **Personal Information that GSP Collects**

The DPA defines Personal Information as any information, whether or not recorded in a material form, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. This includes your name, mobile phone number, landline, residential address, email address, references, and medical/health related information, among others.

Other Personal Information that you will provide may be considered Sensitive Personal Information under the DPA. This includes your age, race, marital status, health, education, employment history, and social security number, among others. GSP will collect, use, or disclose your Sensitive Personal Information only in accordance with the DPA and the Rules, and only after it has obtained your prior written consent when necessary.

More specifically, the following are collected from hired GSP office employees: name; address; telephone number; email address; academic records; next-of-kin name, address, and contact number; names of dependents and beneficiaries; medical and health certificates; NBI clearance; TIN; SSS, Philhealth, PAG-IBIG membership numbers; biometric data; payroll and benefits information; payroll bank account number; and any other information that may be provided or required by public authorities.

### **How GSP Collects Personal Information**

The Personal Information we collect from office applicants are through submitted resumes and/or cover letters which may include name, address, contact number, email address, date and place of birth, gender, marital status, educational attainment, previous work experience, and other information/relevant documents.

If you send us an email, we may collect Personal Information such as your name, email address, as well as the information you submit to us in the email, which include any documents you may attach. The Personal Information may be collected both in accomplished forms to be filled in by the data subject, via courier or ordinary mail service, or electronically as email text or attachment, or through public authorities' web portal.

During job interviews, you may be asked personal information-related questions, e.g., former work experience, the answer of which might be recorded by the interviewer, as such, the applicant has the discretion to disclose information to the interviewer and any disclosure of information by the applicant to the interviewer will be interpreted as the applicant's consent for GSP to collect such disclosed information.

## How GSP May Use Your Personal Information

Personal Information collected and received by GSP shall be used and processed to provide you with employment, service support, and/or other related services, which may include:

- evaluation and processing of your job application;
- endorsement of your Personal Information to GSP's departments for purposes of providing you with employment;
- verification or vetting of your credentials and other Personal Information for responding to your inquiries or concerns;
- carry out our obligations arising from any contracts entered into by you and us, or by you and our clients, which includes disclosing or sharing with our accredited third-party partners, suppliers or relevant public authorities, both domestically and internationally;
- seeking your views or comments on the services we provide;
- notifying you of changes in your contract or our services;
- sending you communications which you have requested, or which are required or may be of interest for your employment;
- contacting allottee or next of kin of clients' seafarers for any inquiry or concern relating to your employment;
- scheduling of booking appointment; and
- for other purposes for which you have availed of GSP's services.

GSP may also use your Personal Information for future marketing, advertising, and promotional activities, provided that it first obtains your prior written consent for such purpose.

## How GSP May Disclose or Share Personal Information with Third Parties

GSP will only share your Personal Information to third parties who have proper interest thereto and only with your consent, unless permitted or required by law. GSP shall take reasonable steps to ensure that third parties are bound by written agreements to use your Personal Information solely for the stated purpose and in accordance with GSP's instructions, and to comply with the DPA and the Rules. GSP may share your Personal Information with third parties, such as:

- **Third-Party Service Providers working on our behalf:** We may pass your Personal Information to our primary third-party service providers, agents, subcontractors and other associated organizations, and to relevant public authorities, domestically or internationally, for the purposes of completing tasks and providing services to you on our behalf. This is done to ensure timely and proper processing of your employment, or any other service. When we use third-party service providers, we disclose only the Personal Information that are necessary to deliver the service.
- **Third-Party Product Providers we work in association with:** We work closely with various primary third-party service/product providers to bring you a range of quality and reliable services/products (e.g., Grieg Philippines, Bank of the Philippine Islands or any other bank, Sycip Gorres Velayo, partner Pre- and Post- Medical Clinics, partner Training and Assessment Centers, partner P&I Correspondents, and the Principal who further outsources/subcontracts other services to parties external to them, and who authorizes shipmasters to share Personal

Information further to their partner port agents and public authorities), both locally and abroad. When you inquire about or use these services, the relevant third-party provider will use your details to provide you with information and carry out their obligations arising from any contract you have entered into with us or them. In some cases, they will act as a data controller of your information and therefore we advise you to read their Privacy Notice. The third-party providers may share your information with us which we will use in accordance with this Privacy Notice.

We may transfer your personal information to a third party as part of the sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganization, or if we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation. We shall at all times take necessary steps with the aim of ensuring that your privacy rights continue to be protected and the transfer of your Personal Information will be to your benefit.

### **If You Choose Not to Provide Your Personal Information**

When you refuse to provide or decide to withdraw your Personal Information, GSP will be unable to provide you with employment, services support, and other related services.

### **Personal Information Security and Retention**

#### **A. Security**

GSP adopts appropriate organizational, physical, and technical measures to protect your Personal Information against any accidental or unlawful/unauthorized destruction, alteration and disclosure, fraudulent misuse, as well as against any other unlawful/unauthorized processing. GSP stores Personal Information in secure digital data storage and those contained in paper-based files are kept inside secure premises or locked filing areas. Among the other measures taken by GSP to ensure the protection of your Personal Information, are the following:

- 1) trainings and seminars for GSP's Officers and Employees are conducted to ensure that they know how to keep your Personal Information safe and secure at all times;
- 2) locks are installed, secure filing cabinets are provided for us, and security systems are in place in GSP's office premises;
- 3) computer passwords are in use to limit access to shared network drives;
- 4) passwords and other encryption methods are in use to protect files and electronic documents from unauthorized sharing/disclosure;
- 5) access to hard copies of documents containing Personal Information is limited to only specifically authorized staff;
- 6) data integrity audits are conducted;
- 7) firewalls and virus scanning tools are in use to prevent unauthorized access into the system; and
- 8) proper tracking of movement and transfer of custody of files containing Personal Information is being observed.

#### **B. Retention**

GSP will retain your Personal Information only for as long as is necessary for the stated purpose or for so long as may be permitted by the DPA and Rules, and other applicable laws. When no longer required or if you ask to be removed from GSP's systems, GSP will dispose or delete your

Personal Information in a secure manner that would prevent further processing, unauthorized access, and/or disclosure to any other party or to the public. Rest assured we review our retention periods for Personal Information on a regular basis.

### **Access, Updating, Correction, or Deletion of Your Personal Information**

You can view the information we have about you by contacting us through our website or by calling or emailing us. Please see our contact information below (under *How to Contact Us*). GSP may, however, deny your request for access on legal grounds, which will be promptly communicated to you.

Generally, you can view your information without a fee, but if you will request your information to be stored in a material form such as a CD or in a printed form, we may ask for a reasonable fee to cover the time we spent recording or printing your information and any photocopying or printing expense incurred by the Company. We will inform you of such fee before proceeding to process your request.

In case you find that your Personal Information with GSP is incorrect or inaccurate, you may inform us of the same, and after we verify your identity and determine that your request is reasonable, we will correct the information immediately and take the necessary steps to ensure that all records pertaining to your Personal Information are corrected and updated.

GSP will likewise undertake to suspend, withdraw, block, remove or destroy your Personal Information from GSP's personal information filing system upon your request, after we have sufficiently verified your identity and have determined the reasonableness of such request.

### **Profiling**

We may analyze your Personal Information to create a profile of your experience, competence, and preference so that we can tailor fit them for your requirements, whether for employment or other purposes, and share with you the relevant information. We may make use of additional information about you when it is available from external sources to help us do this effectively (e.g., assessment results).

### **Links to Other Websites**

Our webpage may contain links to other websites run by other organizations. This Privacy Notice applies only to our organization and its webpage, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy notices and practices of other sites even if you access them using links from our webpage.

In addition, if you linked to our webpage from a third-party site, we cannot be responsible for the privacy notices and practices of the owners and operators of that third-party site and recommend that you check the notice of that third-party site.

### **17 or Under**

We are particularly concerned about protecting the privacy of individuals aged 17 or under. If you are aged 17 or under, please get the permission of your parent/guardian before provide us your Personal Information.

## **Transfer of Your Personal Information Outside the Philippines**

As part of the services offered to you by the Company, the information which you provide to us may be transferred to countries outside of the Philippines (as Grieg Philippines/Manning Agent is a Filipino company) and outside of the European Union (EU) (as Grieg Star/Principal being the employer is a Norwegian company). By way of example, this may happen if any of the Principal's servers containing your Personal Information are from time to time located in a country outside of the EU. By submitting your Personal Information, you agree to their transfer, storage, and/or processing. If we transfer your information outside of the Philippines or the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Notice.

## **Your Rights in Relation to Your Personal Information**

Under certain circumstances and in accordance with European Union's General Data Protection Regulation (GDPR) and Philippines' DPA, you may have the right to require us to:

- provide you with further details on the use we make of your information;
- provide you with a copy of information that we hold about you;
- update any inaccuracies in the Personal Information we hold;
- delete any Personal Information that we no longer have a lawful ground to use;
- where processing is based on consent, withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interest grounds unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your information whilst a complaint is being investigated.

You may also ask us not to process your Personal Information for marketing purposes. We will inform you if we intend to disclose your information to any third-party service provider for this purpose.

We are also required to take reasonable steps to ensure that your Personal Information remains accurate. In order to assist us with this, please let us know of any changes to the Personal Information that you have provided to us by contacting us.

While it is our policy to respect the rights of individuals, please be aware that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime), our interests (e.g., the maintenance of legal privilege) and some of these rights may be limited (for example the right to withdraw consent) where we are required or permitted by law to continue processing your Personal Information to defend our legal rights or meet our legal and regulatory obligations.

If you contact us to exercise any of these rights, we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your Personal Information or our response to any exercise of these rights, you have the right to complain to the National Privacy Commission.

**How to Contact Us**

For all inquiries concerning the processing of your Personal Information, you may reach GSP through our Data Protection Officer.

**Data Protection Officer**

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**Changes to this Privacy Notice**

GSP may revise or update this Privacy Notice at any time upon posting a notice of such change or update in its website.

**Date last updated: July 2025**