

CLIENT CONTACTS

We process personal data about individuals who instruct us on behalf of organisations, individuals who work for such organisations, contractors and advisors of such organisations, and directors and shareholders of such organisations. We also process personal data about individuals who instruct us on their own behalf, but this is not the majority of our practice. This section includes information about both current and past clients.

What do we collect?

We may collect the following kinds of information about you where relevant.

Types of data	Sources
<p>Identity Data</p> <p>First name, last name, title, date of birth, gender, company name.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Other professional advisors.</p> <p>Other parties involved in a client matter.</p>
<p>Contact Information</p> <p>Home and work addresses as appropriate, telephone and fax numbers, email addresses and any other appropriate contact details in the circumstances in question.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Other professional advisors.</p> <p>Other parties involved in a client matter.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p>
<p>Employment Information</p> <p>Organisation name, position/title, employment history, professional specialism and qualifications.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Other professional advisors.</p> <p>Other parties involved in a client matter.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p>
<p>Service Data</p> <p>Details about services and products you have requested or we have provided to you or your organisation.</p>	<p>Directly from you.</p> <p>The organisation for which you work.</p>
<p>Marketing and Communications Data</p> <p>Preferences on receiving marketing from us and communication preferences.</p>	<p>Directly from you.</p>

<p>Interests and Engagement with the firm</p> <p>Professional and personal interests, requests made in the past, interaction and engagement with the firm eg. attendance at events.</p>	<p>Directly from you.</p> <p>The organisation for which you work.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p> <p>Other parties involved in a client matter.</p>
<p>Financial Data</p> <p>In some limited circumstances where an individual's financial information is used or where the company's details can be said to be 'personal data', bank details and transaction history.</p>	<p>Directly from you.</p> <p>The organisation for which you work.</p> <p>Our banks.</p>
<p>Other Information</p> <p>Information we receive during the course of the provision of shipbroking service to you or the organisation for which you work (this could be case matter-related or incidental to our business relationship with you).</p> <p>We do not receive or ask information about health, ethnic or racial origin or trade union membership, political opinions, religious or philosophical beliefs, sex life or sexual orientation, biometric or genetic data.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Other professional advisors.</p> <p>Other parties involved in a client matter.</p> <p>Public sources, such as information available from searching the internet or on business networking sites.</p>

How do we use your personal data and on what lawful bases?

We do not process 'special category' or criminal records data as a matter of course, but where we may receive such data we have included our lawful grounds for processing it.

Purpose	Type of data	Lawful basis for processing	Who we share it with
<p>To open a new client file or matter file, including conducting the checks required by applicable laws and regulators, or to refresh such checks.</p>	<p>(a) Identity. (b) Contact. (c) Employment (d) Service. (e) Other.</p>	<p>(a) Compliance with our legal obligations. (b) Necessary for our legitimate interests to provide shipbroking services or to shipbroking service on behalf of our clients.</p>	<p>The organisation for which you work.</p> <p>Where required as part of the conduct of the matter, or instructed by you, third parties and/or their professional advisors.</p>

<p>Communicating with you on client matters in order to fulfil our instructions, otherwise provide shipbroking service , or to discuss our services or fees.</p>	<ul style="list-style-type: none"> (a) Identity. (b) Contact. (c) Service. (d) Interests and Engagement. (e) Other. 	<p>Necessary for our legitimate interests:</p> <ul style="list-style-type: none"> (a) to provide shipbroking services or to conduct shipbroking services on behalf of our clients; (b) to develop business relationships in order for ITCM to conduct a business which provides shipbroking 	<p>The organisation for which you work.</p>

<p>To respond to any complaints or claims and to carry out customer satisfaction research.</p>	<p>(a) Contact. (b) Interests and Engagement. (c) Other.</p>	<p>Necessary for our legitimate interests: (a) to improve our services; (b) to develop business relationships.</p>	<p>The organisation for which you work.</p>
<p>To provide you with value added services such as shipbroking updates and relevant events.</p>	<p>(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and Communications. (e) Other.</p>	<p>Necessary for our legitimate interest to develop business relationships in order for ITCM to conduct a business which provides services. Necessary for our legitimate interest to provide value added services to clients and business contacts. Where we use emails for such communications and you are an individual for the purposes of the ePrivacy rules, we first obtain your consent.</p>	<p>The organisation for which you work. Events service providers (for example catering and security staff, and premises providers if the event is off-site). Events partners (usually other shipbroking firms or professional service providers).</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you.</p>	<p>(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and Communications. (e) Service. (f) Other.</p>	<p>Necessary for our legitimate interest to develop the business of ITCM and provide value added services to clients and business contacts. Where we use emails for such communications and you are an individual for the purposes of the Privacy rules, we obtain your consent.</p>	<p>The organisation for which you work.</p>
<p>To update our records and for audit purposes.</p>	<p>(a) Identity. (b) Contact. (c) Employment. (d) Marketing and</p>	<p>Necessary for our legitimate interests to conduct a business which provides shipbroking advice to our clients and to handle cases on behalf of our clients or on</p>	<p>The organisation for which you work. Our professional advisors. Government bodies</p>

our

	<p>Communications.</p> <p>(e) Interests and Engagement.</p> <p>(f) Financial.</p> <p>(g) Service.</p> <p>(h) Other.</p>	own behalf.	Greece regulatory and law enforcement bodies, where required of us under Greek law or regulation
To ensure that we receive payment.	<p>(a) Contact.</p> <p>(b) Financial.</p>	Necessary for our legitimate interests to conduct a business which provides shipbroking advice to our clients.	Our service providers such as credit check agencies, counsel, lawyers and debt collectors.
To enable third party service providers such as counsel or expert witnesses to carry out any of the purposes set out above on our behalf.	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Employment.</p> <p>(d) Marketing and Communications.</p> <p>(e) Interests and Engagement.</p> <p>(f) Financial.</p> <p>(g) Service.</p> <p>(h) Other.</p>	As above.	Service providers engaged on behalf of your organisation or on behalf of us.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Usage, Profile, Marketing and Communications and Service Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, and communications may be relevant to you.

You may receive marketing communications from us (usually shipbroking update bulletins or circulars or event invitations) if you have requested information from us, previously instructed us, expressed an interest in a particular topic, or if you know one or more of our employees and, in each case, if you have not opted out of receiving that marketing.

Third-party marketing: joint events

From time to time we run events with third parties. The event invitations will always make it clear who these partners are before you accept or reject an invitation. Whilst the attendance list may be available to them on the day of the event, we do not share your personal data with them otherwise.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at privacy@itcm.gr. Where you opt out of receiving these marketing messages, this will not affect our communications with you in the course of providing our services.