

VISITORS TO OUR WEBSITE

You do not have to give us any personal data to make use of our Website (itcm.gr). But you may decide to give us information about yourself when you contact us or when you sign up to receiving mailings or event invitations from us.

What personal data do we collect about Website visitors?

- Identity Data:** first name, last name, company name, your username and password, and, if you are contacting us to exercise your data protection rights, photographic and residential identification documents.
- Contact Data:** email addresses and telephone numbers.
- Technical and Usage Data:** your login data if you use ITCM's IT services, browser type and version, time zone setting and location (limited to your city), browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website, receipt and clicks on emails we send from our automated email system, and information about how you use our Website.
- Marketing and Communications Data:** preferences on receiving marketing from us and communication preferences.
- Interests and Engagement with the firm:** information on our past interactions with you, your interests, preferences and feedback.
- Service Data** includes details about services you have requested and/or purchased from us.
- Any Other Data you give us:** for example in a communication with us through our Website you may give us information about your current employment, or in an emergency situation. In such emergency situations it is possible that you may communicate 'special category' data such as information about health, political opinions, religious or philosophical beliefs or criminal records to us, whether about you or a third party. If you sign up to attend one of our events you may give other information such as your dietary requirements, or details of special assistance you may need.

We may also collect Aggregated Data such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature.

How do we collect information about you?

We collect data from and about you in a number of ways, including:

- **Direct interactions with you.** You may give us your Identity, Contact, Marketing and Communications, and Interests and Engagement Data by filling in the Website contact forms or by contacting us by email, telephone or post. This includes personal data you provide when you:
 - Register to receive our publications, such as bulletins and event invitations;
 - Contact us about our services;
 - Give us some feedback.

- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We also receive Technical and Usage Data when you receive emails sent from our client relationship management database, such as whether you have received, opened and clicked on links within such emails.

- **Third parties or publicly available sources.** We may receive Technical Data about you from analytics providers such as Google Analytics based outside the EU.

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

Purpose	Type of data	Lawful basis for processing	Who we share it with
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity. (b) Contact. (c) Technical and Usage.	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).	Third party website service providers. Google Analytics.
To respond to enquiries from you.	(a) Identity. (b) Contact. (c) Marketing and Communications. (d) Interests and Engagement. (e) Service Data (f) Any Other Data.	Necessary for our legitimate interests: (a) to provide shipbroking advice. (b) to develop business relationships in order for ITCM to conduct a business providing shipbroking services.	We do not share such personal data with external parties unless your query requires it.

To use data analytics to improve our Website, services, marketing, customer relationships and experiences.	(a) Technical and Usage.	Necessary for our legitimate interests (to keep our Website updated and relevant, to develop our business and to inform our marketing strategy).	Third party website service providers. Google Analytics.
To provide you with value added services such as shipbroking updates and relevant events.	(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and Communications.	Necessary for our legitimate interests (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.	Events service providers (eg. catering staff) Events partners (eg. Shipbroking firms)
To make suggestions and recommendations to you about services that may be of interest to you.	(a) Identity. (b) Contact. (c) Interests and Engagement. (d) Marketing and Communications. (e) Any Other Data you give us.	Necessary for our legitimate interests (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.	We do not share this personal data with third parties.

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 products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, previously instructed us, or if you know one 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 in the emails which we send you. Where you opt out of receiving these marketing messages, this will not affect our communications with you in the course of providing our services.