

## **BUSINESS CONTACTS**

We process certain personal data about individuals who are not our clients, but with whom we would like to develop our business relationship.

## What do we collect?

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

	Parties involved in one of our client matters.
Other Information	Directly from you.
We may from time to time receive other information from or about you, for example if you are due to join us at a sporting event but cannot because of an injury, or if you give us your dietary preferences for catering purposes. Some of this may be 'special category data', for example if it indicates your health or religion.	The organisation for which you work.

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

We do not process 'special category' data as a matter of course, but where your data may involve special category data we have included our lawful grounds for processing it.

Purpose	Type of data	Lawful basis for processing	Who we share it with
To provide you with value added services such as shipbroking updates and relevant events.	<ul> <li>(a) Identity.</li> <li>(b) Contact.</li> <li>(c) Interests and Engagement.</li> <li>(d) Marketing and Communications</li> <li>(e) Other.</li> </ul>	Necessary for our legitimate interest to develop business relationships in order for ITCM to conduct a business which provides shipbroking 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 Privacy rules, we first obtain your consent.	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 or professional service providers.
To make suggestions and recommendations to you about services that may be of interest to you.	<ul> <li>(a) Identity.</li> <li>(b) Contact.</li> <li>(c) Interests and Engagement.</li> <li>(d) Marketing and Communications.</li> <li>(e) Other.</li> </ul>	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.	The organisation for which you work.
To develop our business profile and	(a) Contact.	Necessary for our legitimate interest to develop our	

analyse our business trends and profiles.	<ul><li>(b) Interests and Engagement.</li><li>(c) Marketing and Communications.</li><li>(d) Other.</li></ul>	business which provides shipbroking services.	
To update our records, including to keep personal data up to date.	<ul> <li>(a) Identity.</li> <li>(b) Contact.</li> <li>(c) Employment.</li> <li>(d) Marketing and Communications.</li> <li>(e) Interests and Engagement.</li> <li>(f) Financial.</li> <li>(g) Service.</li> <li>(h) Other.</li> </ul>	Necessary for our legitimate interests to conduct a business which provides shipbroking advice to our clients.	Our professional advisors.
To respond to any complaints.	<ul><li>(a) Contact.</li><li>(b) Interests and Engagement.</li><li>(c) Other.</li></ul>	Necessary for our legitimate interests: (a) to improve our services and business development practices; (b) to develop business relationships in order for ITCM to conduct a business which provides shipbroking services.	The organisation for which you work. Greece regulatory and law enforcement bodies, where required of us under Greek law or regulation.

### 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 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.