

THIRD PARTIES INVOLVED IN CLIENT MATTERS

As part of the service our clients request, we process personal data about individuals who are involved directly or indirectly in client matters.

Types of data	Sources
<p>Identity Data</p> <p>First name, last name, title, date of birth, gender, company name (if applicable).</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Our client.</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>Our client.</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>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>Our client or 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>Our bank(s).</p> <p>The organisation for which you work.</p> <p>Our client or other parties involved in a client matter.</p>

<p>Other Information</p> <p>Information we receive during the course of the provision of shipbroking services to our clients.</p> <p>This will depend on the type of matter involved.</p> <p>This may include 'special category' data, such as information about health, ethnic or racial origin or trade union membership, political opinions, religious or philosophical beliefs, and in more unusual cases (for example where included in an email in a disclosure exercise) sex life or preferences. We are unlikely to receive biometric or genetic data. We may receive information about individuals' criminal records data if relevant to the interaction with the individual or the client matter.</p>	<p>The organisation for which you work.</p> <p>Directly from you.</p> <p>Our clients.</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>
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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>Communicating with you on our client's instructions in order to progress our client's matters.</p>	<p>(a) Identity. (b) Contact. (c) Any Other Data.</p>	<p>Necessary for our legitimate interests to communicate with third parties in order to enable us to provide shipbroking services.</p> <p>Special category data/criminal records data:</p> <p>Necessary for the purpose of or in connection with shipbroking or establishing/exercising or defending our rights.</p>	<p>The organisation for which you work.</p> <p>Our clients.</p> <p>Other professional advisors.</p> <p>Other parties involved in a client matter.</p> <p>Government bodies</p>
<p>Gather information relevant to our client's matters, or otherwise process your information to provide shipbroking services to our clients.</p>	<p>(a) Identity. (b) Contact. (c) Any Other Data.</p>	<p>Necessary for our legitimate interests to provide shipbroking advice to our clients and to handle cases on behalf of our clients or on our own behalf.</p>	<p>The organisation for which you work.</p> <p>Service providers engaged on the behalf of your organisation.</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>Government bodies</p> <p>GREECE regulatory and law enforcement bodies, where required of us under GREEK law or regulation</p>
To make or receive payments on our client's behalf.	<p>(a) Contact.</p> <p>(b) Financial.</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 our own behalf.	<p>Our bank(s).</p> <p>Service providers such as credit check agencies, counsel, lawyers and debt collectors.</p>
To update our records and for audit purposes.	<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) Any Other Data.</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 our own behalf.</p> <p>Special category data/criminal records data:</p> <p>Necessary for the purpose of or in connection with shipbroking advice.</p>	<p>The organisation for which you work.</p> <p>Our professional advisors.</p> <p>Government bodies.</p> <p>GREECE regulatory and law enforcement bodies, where required of us under GREEK law or regulation</p>
To comply with our legal and professional obligations, for example towards the Court, to comply with legislation on money laundering or terrorist financing, or to comply with privacy laws.	<p>(a) Identity.</p> <p>(b) Contact.</p> <p>(c) Employment.</p> <p>(d) Marketing and Communications.</p> <p>(e) Financial.</p> <p>(f) Service.</p> <p>(g) Any Other Data.</p>	<p>Necessary to comply with our legal obligations.</p> <p>Necessary for our legitimate interest to respond to relevant regulators and law enforcement authorities.</p> <p>Special category data/criminal records data:</p> <p>(a) Necessary for the purpose of or in connection with shipbroking</p>	<p>The organisation for which you work.</p> <p>Our professional advisors.</p> <p>Government bodies.</p> <p>GREECE regulatory and law enforcement bodies, where required of us under GREEK law or regulation</p>

<p>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>	<ul style="list-style-type: none"> (a) Identity. (b) Contact. (c) Employment. (d) Marketing and Communications. (e) Interests and Engagement. (f) Financial. (g) Service. (h) Any Other Data. 	<p>As above.</p>	<p>Service providers engaged on behalf of your organisation or on behalf of us.</p>
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