

## Glossary

In this document some concepts are repeatedly used and/or (slightly) abbreviated. Hereunder what these concepts mean in this context.

) Cuneus, “we”	The Cuneus group of companies for whom this privacy policy is in force.
) Data	Bits of information, both digital and hard-copy.
) Dataset	Data about an employee which together provide understanding of the employee.
) Employee	A person in the employ of one of the Cuneus group companies with the purpose to be hired-out to clients.
) Officer, Staff	A person working in one of the Cuneus offices.
) Third parties	Those who do not hold a contracted position with Cuneus. Under third parties also fall family members or relatives of employees.

## General

Worldwide privacy concerns have grown over the years, resulting in legislation in about every country in the world. Cuneus, as employment agency, handles privacy sensitive data from its employees. It is imperative that we handle that data with care and respect to our employees as well as according to the respective legislations where our companies are based. That is not always easy, as rules may vary from country to country.

Cuneus does not collect data without reason. We need to know some things about our employees to treat them correctly and to provide our clients with the personnel they require. Therefore, we need both personal and professional information about our employees. Furthermore, authorities require that we can show them some of our employees’ documents for reasons of processing or immigration etc.

This general privacy policy complies with all legislation as it stands now and provides Cuneus with the possibility to handle all required documents and/or data in a legally proper way. All Cuneus group companies and their officers and staff will comply with this policy.

Each Cuneus group company has an own privacy policy which conforms to this privacy policy and shall attach this privacy policy as addendum to its own privacy policy.

## Individual

Cuneus group companies also must comply individually with privacy legislation in the country they operate in. Therefore, they have privacy policies in place, particular to their legal situation. Such a privacy policy must also comply with this general privacy policy.

Each officer and staff-member employed within Cuneus will sign a privacy agreement in which he/she confirms this privacy policy and in turn his/her employer confirms that the dataset of the officer or staff-member him/herself is also covered by the privacy policy. This privacy agreement may be part of the employment contract of the officer

## The business of Cuneus

The business of Cuneus is to recruit and deploy its employees to its clients. Some Cuneus group companies are employers, others specialize in sales, recruitment, finance or logistics. Each company within Cuneus will assist the other where arrangement, requirement or necessity calls for.

There are several main tasks which require insight in different datasets. Hereunder a (non-limiting) summary of main tasks and the data and/or documents required.

### Recruitment

To decide whether an applicant is suitable to be interviewed the recruitment company requires the applicant to submit copies of documents to prove:

- Identity and nationality
- Vocational and/or professional licenses
- Professional training certificates
- Employment history
- References
- Contact information (address, telephone etc)
- Medical fitness certificate

During the interview personal characteristics and data are recorded and an assessment is made to decide whether the applicant is suitable for employment:

- Character and attitude
- Specific knowledge of the job at hand
- Language skills

If an applicant is deemed suitable for employment his data and documents are referred to the employment company for the final decision.

### Employment

Each employer needs to know several things of his employee to act as responsible employer. He must have data and documents to enrol his employee in social security, taxation and insurance schemes and to monitor the permits of the employee.

- Residence and marital status
- Next of kin, allottee and beneficiary
- Bank
- Social security and taxations documents and numbers of the country where he is to be employed (if any).
- Work- and residence permits, including application documents
- Sizes for working clothes

Above that the employer needs to know certain details to decide where this employee is best deployed to.

- Official inland shipping position and sailing days.
- (STCW) required diploma's, professional- and training certificates and endorsements
- Riverbook or seaman book
- Performance reports
- Praise and complaints from clients

The employer produces and retains many documents and data during the employment such as:

- Contract and addenda thereto
- Salary slips

- Promotion letters
- Warning letters
- Dismissal and resignation letters
- Registration documents
- Logistic details
- etc.

**Logistics**

Most employees reside in another country than where they are working. Some countries of residence require extensive documentation before the employee may depart. The recruitment company handles this processing and collects the required documents. These documents and/or data are stored.

- OEC documents
- PDOS certificate
- Certificates of local insurance, social security etc.

Some countries of employment require Visa and/or work- and residence permits for the employee. First applications and renewals are handled by either the recruiter or the employer. Data of these processes and submitted documents are stored.

- Visa application forms
- Copies of Visa
- Application forms for residence- and work permits
- Copies of the residence- and work permit
- Data of the process to obtain visa and permits

To arrange (air)travel the travel company or airline sometimes requires proof of legal entry in the country of destination.

- Passport
- Visa or residence permit

Port authorities and/or immigration authorities require sometimes more than the usual documentation. To avoid delay of the ship some documents must be shared with the client.

- Passport
- Visa or residence permit
- Professional (STCW) documentation
- Licenses and endorsements
- etc.

**Finance**

The employer provides his employees with salary slips on which all details of the salary are indicated. Where required taxation and social security are part of the salary slip. Taxation and social security are complicated calculations which are done by external specialists. They need specification of - among others - both the agreed salary and the official tax- and social security registration of the employee. The employer collects, stores and shares this data with the external specialist.

- Contract
- Passport
- Tax- and social security registration
- Working hours, overtime and additional data.

## Data collection and storage

Cuneus collects the necessary data and documents primarily from the employee himself. Other data is collected from the client where the employee is placed and the employer himself produces data during the employment. The employee is aware thereof and agrees that Cuneus uses this data in accordance with the privacy policy by signing the privacy agreement. This privacy policy is attached to that agreement.

Cuneus uses a dedicated cloud server in Singapore for shared use. This privacy policy is applicable to that server and its administrator.

This server is equipped with state-of-the-art defences against hacking and other cybercrime. Access to the server is granted through login name and password under the control of its administrator. Quality of both the login names and the passwords is guarded by the administrator. No “guests” are granted access.

## Data usage and sharing

Cuneus only uses the collected data of employees internally and only shares data of its employees with government officials and authorities when and insofar such is legally required by those governments or authorities.

Where necessary Cuneus shares data of its employees with contracted parties (such as accountants), for specific purposes (such as the calculation of salary slips) on the condition that such a contracted party has a privacy policy in place which conforms to the standards of this privacy policy.

Cuneus will never sell the data or dataset of an employee, officer or staff-member to any party and will not contract any party outside Cuneus for this purpose. Cuneus will never share the data or dataset of an employee, officer or staff-member with any party for commercial reasons.

Cuneus group companies which are jointly responsible for aspects of the employment (for instance recruitment and employment) share and use the dataset of that employee. A Cuneus group company not involved in the employment or other aspects of that employee cannot access the dataset of that employee.

Upon his request the employee will receive an excerpt of all privacy sensitive data stored by Cuneus. If he can prove that some data are false or irrelevant and he requests this data to be deleted, the Cuneus group company shall delete that specific document and/or data.

Cuneus will never disclose information of its employees to third parties unless

- ) A legal obligation thereto exists
- ) Upon the specific written request or instruction by the employee him/herself

## Data protection officers (DPO's)

Each Cuneus group company must appoint a data protection officer. The data protection officer must ensure that all information on the employees which is accessible within that Cuneus group company is stored in a safe place to which no access is given to anybody within this organisation and certainly not outside of this organisation unless he or she has specifically been appointed to have such access for reasons to enable Cuneus to carry out its business.

Data protection officers are responsible for the collection, storage and distribution (if so required) of data.

All employees must know the name of the DPO of his/her employer. Cuneus will have a simple procedure in place for the employees to put their questions or remarks about their privacy sensitive data to the DPO. The DPO is obliged to reply to those questions or remarks and to take the appropriate action in accordance with this privacy policy.

## Financial data

Data and documents pertaining to financial information such as salaries, benefits (either monetary or in kind) will not be disclosed to third parties. Employees will regularly be provided with salary remittance confirmation and salary slips. This information will not be forwarded or disclosed to third parties or clients.

Regularly inspections are carried out on salary payments to foreign workers. If authorities covering the workplace of employees require confirmation of salary payments, they are to obtain such information from either:

- The employee him/herself or
- The Cuneus group company office where the employee is employed

## Medical data

Employees are invariably insured against the costs for medical treatment, disability and death. Primary insurance is the social security system of the country where the employee is employed. Because of the failure of these systems to cover payments/costs made outside of the country of this system, including disability payments when the (ex-)employee is outside that country, Cuneus has insured its employees externally. This insurance companies have appointed Cuneus as collectors of medical information. They require:

- Medical fitness certificate to their own specification at the commencement of the employment.
- Medical treatment reports from the attending physician.
- Invoices or receipts for medical treatment for which the employer has paid or reimbursed the employee or the client.
- Unfit / Fit for duty statements by the attending physician.

Except for medical treatment reports Cuneus will store these data. Medical treatment reports will be sent to the insurer and destroyed after confirmation of receipt by the insurer is received.

## Retention period

Cuneus must be able to defend itself against possible (future) claims by (former) employees, their relatives, family members and others who claim to have an interest in the wellbeing, health, death or income of (former) employees.

Cuneus will retain employees' data for ten years after all regular formalities are fulfilled at the end of the employment or longer for as long as a legal obligation thereto exists or if a claim is not settled at the end of the retention period.

During the retention period the dataset will be stored in the cloud server and will only be accessible by the administrator of the server. In case of a claim the affected Cuneus group company will get access to the dataset.

The former employee has the right to be forgotten before the end of the retention period on the condition that he signs an agreement in which he denounces all rights to claim anything from Cuneus and declares that he and his heirs shall reimburse Cuneus for all costs that may arise out of the deletion of his dataset, including later claims of his relatives, family members or other parties, whether or not on his behalf, against which Cuneus cannot defend itself for lack of data, even if such a claim is awarded by a court of justice. This signed document will replace the dataset in the server and will not ever be deleted.

### **Pension, savings or provident fund**

Employees who enjoy a pension policy or provident savings are registered with the relevant fund. Cuneus thereto must share data pertaining to the identity and employment history of those employees.

The Cuneus group company acts as the agent of pension, savings or provident funds.

To respond to correspondence and claims the respective funds are to retain relevant information forever.

### **Automated decision making based on collected data**

Cuneus will not practise automated decision making. Before, during and after employment the dataset of an employee will always be reviewed by a human eye and decisions on employment will be made by an officer of Cuneus who has been appointed or authorised thereto.