



MEMECO RECRUITMENT PTE LTD.

Personal Data Protection Policy

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1. Memeco's Personal Data Protection Policy

Memeco is committed to the protection of your personal data. Memeco collects, uses, discloses and retains your personal data in accordance with the Personal Data Protection Act 2012 (PDPA) and our own employment procedures.

The purpose of this Data Protection policy is to regulate how Memeco collects, uses, discloses and retains your personal data relating to your employment on board sea-going vessels. We developed this Policy as part of our on-going commitment to the protection of your personal data.

For a summary of our privacy commitment to you, including the type of personal data we collect, how we collect it, how to access, correct or update your personal data, or what to do if you have a complaint about the treatment of your personal data, please refer to our [privacy statement](#) available on our website at www.memecocrew.com or by contacting us by sending an e-mail to ops@memecocrew.com.

2. Objectives

The objectives of this Policy are to:

- a. Provide a set of privacy and personal data protection standards that govern our procedures and protect the privacy of your personal data.
- b. Demonstrate our on-going commitment to protecting your privacy and addressing any privacy concerns that you might have.
- c. Describe the ways in which we collect, use, disclose and retain your personal data.
- d. Ensure that we comply with the PDPA.
- e. Facilitate our compliance with any further developments in the protection of personal data.

3. Personal Data Protection Act 2012 (PDPA)

Below, we provide guidance as to how to collect, use, disclose and retain your personal data in accordance with the PDPA and how we administer the Policy.

4. Consent Obligation (PDPA section 13 to 17)

4.1. Consent required

4.1.1. Memeco shall not collect, use, or disclose your personal data unless:

- a. You give, or are deemed to give, consent to the collection, use or disclosure of your personal data, in view of your employment with Memeco or
- b. The collection, use or disclosure of your personal data without your consent is required or authorized under the PDPA or other written law.

4.2. Provision of consent

4.2.1. Memeco shall not, as a condition of providing employment services on board seagoing vessels to you, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide the employment services to you.

4.2.2. Memeco shall not obtain or attempt to obtain your consent for collecting, using or disclosing personal data by providing false or misleading information with respect to the

collection, use or disclosure of your personal data or use deceptive or misleading practices.

4.3. Deemed consent

- 4.3.1. You are deemed to consent to the collection, use or disclosure of your personal data for a purpose if:
 - a. You voluntarily provide your personal data to Memeco for the purpose, albeit without actually expressly providing your consent; and
 - b. It is reasonable that you would voluntarily provide the data.
- 4.3.2. If you give, or deemed to give, consent to the disclosure of your personal data by Memeco to another organization, for a particular purpose, then you are deemed to consent to the collection, use or disclosure of your personal data for that particular purpose by such other organization.

4.4. Withdrawal of consent

- 4.4.1. On providing reasonable notice to Memeco, you may at any time withdraw any consent given or deemed to be given, in respect of Memeco's collection, use or disclosure of your personal data for any purpose.
- 4.4.2. You may submit the withdrawal of consent via e-mail to ops@memecocrew.com
- 4.4.3. On receipt of such notice, Memeco shall inform you of the consequences of withdrawing your consent.
- 4.4.4. If you withdraw your consent, then Memeco shall cease collecting, using or disclosing your personal data.

5. Purpose Limitation Obligation (PDPA section 18)

5.1. Limitation of purpose

- 5.5.1. Memeco may collect, use or disclose your personal data only for the following purposes:
 - all purposes relating to employment on board a seagoing vessel; and
 - where you have been informed in accordance with clause 4.2. of this policy, to the extent applicable.

5.2. Notification of purpose

- 5.2.1. Memeco shall provide you with the following information whenever we seek to obtain your consent to the collection, use or disclosure of your personal data, except under circumstances where your consent is deemed or is not required:
 - The purpose for the collection, use or disclosure of your personal data, on or before collecting your personal data;
 - Any other purpose for the use or disclosure of your personal data of which you have not been informed under clause 4.2.1. of this policy, before the use or disclosure of your personal data for that purpose; and
 - On request by you, the contact details of the Memeco Data Protection Officer (DPO) who can answer your questions about the collection, use or disclosure of your personal data.

6. Access and Correction obligation (PDPA section 21 and 22)

6.1. Access to your personal data

6.1.1. On your request, and subject to the restrictions set forth in the PDPA, Memeco shall as soon as reasonably possible, provide you with

- Your personal data that is in Memeco's possession or control; and
- Information about the ways in which your personal data has or may have been used or disclosed by Memeco within a year before the date of your request.

6.2. Correction of your personal data

6.2.1. You may request Memeco to correct an error or omission in your personal data that is under Memeco's control or possession. Memeco shall:

- Correct your personal data as soon as practicable; and
- Inform you that the data has been corrected accordingly.

7. Accuracy Obligation (PDPA section 23)

Memeco shall make reasonable efforts to accurately record your personal data as given by you and make reasonable efforts to ensure that your personal data is accurate and complete.

8. Protection Obligation (PDPA section 24)

Memeco shall protect personal data in its possession or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or any other similar risks.

9. Retention Limitation Obligation (PDPA section 25)

Memeco shall cease to retain documents containing your personal data, or remove the means by which your personal data can be associated with you, as soon as it is reasonable to assume that:

- The purpose for which your personal data was collected is no longer being served by retention of your personal data;
- Retention is no longer necessary for legal or business purposes.

10. Transfer Limitation Obligation (PDPA section 26)

Memeco shall not transfer your personal data outside of Singapore except in accordance with the requirements of the PDPA.

11. Openness Obligation (PDPA section 11 and 12)

Memeco is transparent about how it uses personal data. The purpose for the collection, use or disclosure of your personal data, on or before collecting your personal data is solely for the purpose of your employment on board seagoing vessels.

12. Do Not Call Provisions

Memeco shall not send any marketing messages and other product information messages.

13. Complaints handling procedure

13.1. Should you be unsatisfied with our treatment of your personal data or you believe there has been a breach of this policy, please contact Memeco's Data Protection Officer (details in clause 16 below) and clearly set out the nature of your concern in writing only.

13.2. Your complaint will be reviewed and you will be provided with a written response within one month.

14. Compliance with this Policy

14.1. Memeco implements this policy through the use of proper procedures and staff training to ensure compliance with this policy.

14.2. We ensure that all employees and any representatives who deal with personal data are aware of the standards of this policy.

14.3. Memeco requires that all employees and any representatives with access to personal data maintain confidentiality concerning that personal data.

14.4. Our procedures for handling personal data are developed to implement the standards of this policy. Memeco trains its employees in the proper conduct of those procedures.

15. Review of Memeco's data protection policy

Memeco ensures that this policy remains current and continues to fulfill its objectives, so it will be reviewed periodically.

16. Data Protection Officer (DPO)

For further information about this policy or if you would like to contact Memeco's Data Protection officer regarding a concern you might have please send an e-mail to:

ops@memecocrew.com attn.: Memeco Data Protection Officer.