

# PRIVACY POLICY

Responsible party pursuant to data protection laws, in particular the EU General Data Protection Regulation (GDPR), is

Thomas Schulte Ship Management GmbH & Co. KG

Zürich Haus

Domstr. 17

20095 Hamburg

## Your rights as the data subject

You can exercise the following rights at any time using the contact details of our data protection officer:

Information of your data stored by us and the processing thereof (Art. 15 GDPR),

Rectification of inaccurate personal data (Art. 16 GDPR),

Deletion of your data stored by us (Art. 17 GDPR),

Restriction of the data processing, provided that we may not delete your data due to legal obligations (Art. 18 GDPR),

Objection to the processing of your data with us (Art. 21 GDPR), and

Data portability, provide that you have consented to the data processing or have entered into a contract with us (Art. 20 GDPR).

If you have given us consent, you may withdraw it at any time, which will remain in effect in the future.

You can contact a supervisory authority with a complaint at any time, e.g. the supervisory authority of the state of your residence or the authority that oversees us as the responsible party.

You'll find a list of supervisory authorities (for the non-public area) with their respective addresses at: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html) (only available in German language).

## Cookies

### Type and purpose of the processing

Like many other websites, we use so-called 'cookies'. Cookies are small text files that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our website.

With cookies, we receive certain information such as IP address, type of browser and operating system used.

Cookies cannot be used to start programs or to transmit viruses to a computer. Based on the information contained in cookies, we can facilitate your navigation of our site and properly display our webpages for you.

The data collected by us will not be shared with third parties under any circumstances nor will a link to personal data be created without your consent.

Of course, you can view our website without cookies. Internet browser are regularly configured to accept cookies. In general, you can disable the use of cookies via your browser settings at any time. Please use your Internet browser's help function to learn how to change these settings, and keep in mind that individual features of our website may not work if you have disabled the use of cookies.

### Retention period and cookies used

If you allow us to use cookies, via your browser settings or consent, the following cookies may be utilised on our web pages:

\_\_cfduid (1 year)

\_\_qca (1 year)

iutk (10 years)

d (3 month)

mc (13 month)

cookieconsent\_status (12 month)

PHPSESSID (Session end)

autologin\_id (30 days)

In the following sections, we provide you with information concerning how these cookies can (also) pertain to personal data.

In your browser settings, you can delete individual cookies or the entire set of cookies. You will also find information and instructions on how to delete these cookies or prevent them from being saved in advance. The following links provide the information you'll need for the respective browser providers:

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Google Chrome: <https://support.google.com/accounts/answer/61416?hl=en>

Opera: <https://www.opera.com/o/ie-simple>

Safari: [https://support.apple.com/kb/PH17191?locale=de\\_DE&viewlocale=en\\_US](https://support.apple.com/kb/PH17191?locale=de_DE&viewlocale=en_US)

## Registration on our website

### Type and purpose of the processing

With the registration to use our personalised services, some personal data such as name, address, contact and communication information (e.g. phone number and e-mail address) are collected. If you are registered with us, you can access content and services that we only offer to registered users. Registered users also have the ability to change or delete the data entered during registration at any time. At any time, we will also provide you with information on the personal data about you that we have saved.

### Legal basis

The data entered during registration are processed on the basis of the user's consent (Art. 6 Para. 1 (a) GDPR).

If the registration fulfils the obligations of a contract, whose contractual party is the data subject, or serves to implement pre-contractual measures, the additional legal basis for the data processing is Art. 6 Para. 1 (b) GDPR.

### Recipients

Recipients of the data may be technical service providers, who work on the operation and maintenance of our website as the processor.

### Retention period

Data are only processed in this context provided that the corresponding consent has been given. The data will be deleted thereafter, provided that no statutory retention obligations prohibit the deletion. To contact us in this regard, please use the contact information provided at the end of this privacy policy.

### Mandatory or required provision

The provision of your personal data is voluntary, based solely on your consent. Without the provision of your personal data, we cannot give you access to our content and services.

## Contact form

### Type and purpose of the processing

The data you enter are used for individual communication with you. A valid e-mail address and your name are required for this communication, which serves to organize your inquiry and the respective subsequent reply. Providing additional information is optional.

### Legal basis

The processing of the data entered in the contact form occurs on the basis of a legitimate interest (Art. 6 Para. 1 (f) GDPR).

By providing the contact form, our aim is to facilitate an uncomplicated means for you to contact us. The information you enter will be used to process the inquiry and saved for possible follow-up questions.

If you contact us to request an offer, the processing of the information provided in the contact form will occur in order to implement pre-contractual measures (Art. 6 Para. 1 (b) GDPR).

### Recipients

Recipients of the data may be processors.

### Retention period

The data will be deleted no later than 6 months after processing the inquiry.

Provided that we enter into a contract together, we will use the statutory retention periods in the German Commercial Code (Handelsgesetzbuch) and delete your data according to the respective stipulated deadlines.

### Mandatory or required provision

The provision of your personal data is voluntary. However, we can only process your inquiry if you provide us with your name, e-mail address and the reason for your inquiry.



## Using Google Analytics

### Type and purpose of the processing

This website uses Google Analytics, a web analytics service of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043 USA (hereinafter: 'Google'). Google Analytics uses so-called 'cookies', i.e. text files that are stored on your computer and allow an analysis of your use of the website. The information generated by the cookie about your use of this website is typically transmitted to a Google server in the U.S. and stored there. However, due to the activation of IP anonymisation on these websites, your IP address will be truncated beforehand by Google within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the U.S. and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, summarise reports on website activities and provide other services related to website and Internet usage to the website operator. The IP address transferred from your browser as part of Google Analytics will not be combined with other data from Google.

The data processing purposes are the website-use analysis and the summary of reports on activities on the website. Based on the use of the website and the Internet, other related services will be provided.

### Legal basis

The processing of the data occurs on the basis of the user's consent (Art. 6 Para. 1 (a) GDPR).

### Recipients

The recipient of the data is Google as the processor. For this, we have entered into the corresponding data-processing contract with Google.

### Retention period

The deletion of the data occurs as soon as they are no longer necessary for our recording-keeping purposes.

### Third country transfers

Google processes your data in the United States of America and is subject to the EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

### Mandatory or required provision

The provision of your personal data is voluntary, based solely on your consent. If you prevent access, this can lead to functional limitations on the website.

### Revocation of consent

You can prevent the storage of cookies by a corresponding setting in your browser software; however, please note that in this case you may not be able to use all the functions of this website in their entirety. Furthermore, you can prevent the collected data generated by the cookie and the data related to your use of the website (including your IP address) being transmitted to Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in available at the following link: [browser add-on to deactivate Google Analytics](#).

In addition, or as an alternative to the browser add-on, you can prevent tracking by Google Analytics on our web pages by clicking this link, which will install an opt-out cookie on your device. This will prevent data collection by Google Analytics for this website and for this browser in the future, as long as the cookie remains installed in your browser.

### Profiling

With the assistance of the tracking tool Google Analytics, the browsing behaviour of the website visitors can be evaluated and their respective interests can be analysed. For this analysis, we create a pseudonymous user profile.

## Using script libraries (Google Webfonts)

### Type and purpose of the processing

In order to present our content correctly and graphically appealing across all browsers, we use 'Google Webfonts' from Google LLC (1600 Amphitheater Parkway, Mountain View, CA 94043, USA, hereinafter 'Google') to display fonts on this website.

You'll find the data protection guidelines of the library operator Google here:  
<https://www.google.com/policies/privacy/>

### Legal basis

Your consent is the legal basis for the integration of Google Webfonts and the associated data transfer to Google (Art. 6 Para. 1 (a) GDPR).

### Recipients

The use of script libraries or font libraries automatically triggers a connection to the operator of the library. It is theoretically possible – but currently also unclear whether and to what end – that the operator, in this case Google, will collect data.

### Retention period

We do not collect any personal data via the integration of Google Webfonts.

You'll find additional information on Google Webfonts at <https://developers.google.com/fonts/faq> and in Google's privacy policy: <https://www.google.com/policies/privacy/>.

### Third country transfers

Google processes your data in the United States of America and is subject to the EU-US Privacy Shield <https://www.privacyshield.gov/EU-US-Framework>.

### Mandatory or required provision

The provision of your personal data is neither legally nor contractually required. However, the correct presentation of standard-fonts content is not possible without this provision.

### Revocation of consent

The programming language JavaScript is regularly used to display content. Thus, you can opt out of the data processing by disabling JavaScript execution in your browser or by installing a JavaScript blocker. Please note that this may result in functional limitations on the website.

## Using Adobe Typekit

### Type and purpose of the processing

We use Adobe Typekit for the visual design of our website. Typekit is a service of Adobe Systems Software Ireland Companies (4-6 Riverwalk, Citywest Business Campus, Dublin 24, Republic of Ireland; hereinafter 'Adobe'), which grants us access to a font library. To incorporate the fonts we use, your browser must connect to an Adobe server in the U.S. and download the fonts we require for our website. Thereby, Adobe receives the information that our website retrieved from your IP address. For more information about Adobe Typekit, see the Adobe privacy policy available at: <https://www.adobe.com/uk/privacy/policy.html>

### Legal basis

Your consent is the legal basis for the integration of Adobe Typekit and the associated data transfer to Adobe (Art. 6 Para. 1 (a) GDPR).

### Recipients

The use of script libraries or font libraries automatically triggers a connection to the operator of the library. You'll find information on the use of your data by Adobe Typekit Web Fonts at <https://typekit.com/> and in the privacy policy of Adobe Typekit: <https://www.adobe.com/uk/privacy/policies/typekit.html>.

### Retention period

We do not collect any personal data via the integration of Adobe Typekit Web Fonts.

### Third country transfers

Adobe is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt0000000TNo9AAG&status=Active>).

### Mandatory or required provision

The provision of your personal data is neither legally nor contractually required. However, the correct presentation of standard-fonts content is not possible without this provision.

### SSL encryption

To protect the security of your data during transmission, we use state-of-the-art encryption methods (such as SSL) via HTTPS.

## Appointed processors

The following organisations, companies or people were commissioned with data processing by the operator of this website:

## Questions for the data protection officer

If you have any questions pertaining to data protection, please send us an e-mail or contact the person responsible for data protection in our organization

Arne Maskus

Zürich Haus

Domstr. 17

20095 Hamburg

Telefon: +49.40.81 99 43 10

E-Mail: [dataprotection@tsm-shipmanagement.com](mailto:dataprotection@tsm-shipmanagement.com)

## Revision of our privacy policy

We reserve the right to amend this privacy policy so that it always complies with current legal requirements or to implement changes to our services in the privacy policy, e.g. when introducing new services. Your next visit will be subject to the new privacy policy.

The privacy policy was created via the activeMind AG Privacy Policy Generator (Version: 2018-09-24).