

This is a Privacy Policy of KT Ship LLC registered in Estonia at Kadaka tee 72A – 217, Tallinn 12618. This Privacy Policy is a public document available in an open access both on the web page and in the office of KT Ship LLC.

KT Ship LLC is committed to ensure that your privacy is protected in compliance with The General Data Protection Regulation (GDPR) (EU) 2016/679 and this Privacy Policy refers to personal data received via e-mail, electronic storage device, from the maritime web resources where seafarers publish their application forms or provided personally, collected, processed and used for possible job offers and possible further employment.

We are under an obligation, in conformity with Data Protection Legislation, to inform you the reasons for keeping and processing the Personal Data of applicants and obtain your consent for keeping and processing this data.

By providing KT Ship LLC your personal data, you agree on the collection, the use and the disclosure of your personal data in accordance with this policy.

If you do not consent to the collection, use and disclosure of your personal data as set forth in this Privacy Policy, please refrain from providing your personal data.

What kind of personal data we collect

We collect:

Data register					
Personal data	Responsible group	Purpose of processing	Data subjects	Third party	Storing data
Application form which contains: Name, Surname <ul style="list-style-type: none"> • Title • Year of birth, • Address, telephone • Work experience and working references • Education • Data of the working documents 	Crewing department	Proposing any possible employment	Crew members	Ship owners / Managers	Server
Next of Kin details – address, phone, copies of personal documents	Crewing department	Contact in case of emergency	Crew members	Ship owners / Managers	Server
Bank details	Crewing department	to ensure smooth payment of salaries	Crew members	Ship owners / Managers	Server

Biometric data (sizes of clothes, height, weight, fingerprints)	Crewing department	to supply you with working clothes prior joining, etc.	Crew members	Ship owners / Managers	Server
Medical data	Crewing department	to ensure you are fit for duty and fulfill your responsibilities	Crew members	Ship owners / Managers	Server
Copies of your personal documents – passport, id, civil passport, residence registration	Crewing department	to process your travel arrangements, to ensure all documents are valid and in good order	Crew members	Ship owners / Managers, Travel agents, Agents of the vessels	Server
Copies of your working documents	Crewing department	to ensure all your working documents are valid and in good order; to arrange flag sate documents	Crew members	Ship owners / Managers, Flag Administration	Server
Personal details which are required for visa application (details of parents, kids, spouses, registration of marriage, education, army service, etc.)	Crewing department	to arrange any visas needed for joining and sailing on board of the vessel	Crew members	Ship owners / Managers, Agents of the vessels	Server
Visa copies and immigrating stamps	Crewing department	to ensure you can travel safe and all immigration formalities are fulfilled	Crew members	Ship owners / Managers, Agents of the vessels	Server
Expenses	Crewing department	to ensure that your pre – joining expenses are to be reimbursed by the employer	Crew members	Ship owners / Managers	Server
Criminal background	Crewing department	to fulfill requirements of security vetting on tanker fleet	Crew members	Ship owners / Managers	Server

Usage and disclosure of collected personal data

We use your personal data as follows:

- to provide you with data, products or services that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes
- to process your requests and inquiries

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- to process your job application and propose to the owners/managers in accordance with the open positions lists
 - to process your further employment
 - to arrange your contracts of employment
 - to apply for any visas needed for your employment
 - to apply for flag state documents needed to join the vessel
 - to keep contact with your relatives in case of emergency or any related matter
 - to ensure smooth payment of salaries
 - to supply you with working clothes prior joining
 - to prepare all needed formalities and documentation for your travel

All the info about data gathered and processed can be found in the data register of this Privacy Policy.

Data gathered is used for the purpose of processing an application. KT Ship LLC takes appropriate measures to request only the personal data that is adequate, relevant and not excessive for the intended purposes.

We may disclose your personal data to ship owners/managers, travel and vessel's agents, flag administrations and any other parties involved into employment and your travel process. These are required to treat the data only for the purpose for which is provided and in accordance with this Privacy Policy.

KT Ship LLC makes everything possible to ensure that all the partners outside of the EU are well informed about The General Data Protection Regulation (GDPR) (EU) 2016/679 and act in accordance with same regulation.

We may also disclose your data to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support any criminal or legal investigation or proceeding.

All data is collected with the legitimate interest and to provide you further employment on board of the vessel. In case any failure from your side to provide any data requested by KT Ship LLC for above named purposes may lead to termination of our cooperation.

Data provided when applying for a job position must be true and accurate. False declarations will lead to an immediate termination of the employment relationship irrespective of the status.

Storage of collected personal data

All personal data handled by KT Ship LLC is stored offline. The storage is located on a server in a dedicated Local Area Network (LAN) environment.

The server hardware is physically disconnected from the Internet. There is no direct connection to the KT SHIP file server from the Internet via TCP/IP.

The server is protected by a two way authentication system with dedicated per user account and password logon and time limited sessions. Only KT Ship LLC employees involved into crewing process have the access to the data stored on the server.

Potential malware and data theft through Virtual Private Network (VPN) connections are being handled by Firewall software installed and enabled both on Personal Computers (PC) and File Server as well.

All paper applications collected during previous years are stored in our office. Our office is closed and no one else except KT Ship LLC employees has no access to these files.

The data will be collected and stored in good faith, in a proportionate manner, for the purposes above indicated and with the appropriate technical and organizational measures.

Right of access, correction and deletion of personal data

You may at any time request that we:

- inform you of the personal data we hold concerning you;
- correct such personal data if it is inaccurate;
- transfer your personal data;
- delete from our records any personal data we may hold on you. However, it refers to the applicant who has applied with his application form only and who hasn't been yet employed through our company. Data of seafarers who has already been employed through our company will be kept and archived in accordance with company's ISO 9001:2015 manual SOP No. 1 Control of documented Information and form F – 3 Appendix 3 of SOP No. 1 Control of Documented Information.

If you wish to request access to, or correction or deletion of your personal data, or have any queries or concerns regarding this policy or its application, you may contact us by email at ktship@ktship.ee, and we will respond within a reasonable time.

Agreement with this Privacy Policy

By sending us your application, copies of personal and working documents and etc you confirm that:

- You have read and understood the contents of this document and hereby give freely your consent for the processing of your personal data, for the purposes indicated above.
- You agree that all subsidiary or associated companies may have access and the right to process your personal data for recruitment purposes.
- You agree that sensitive personal data we have collected will be processed for the purposes stated in the present document.

Settlement of Disputes

All the inquiries arising due to possible failure of this Privacy Policy would be processed in accordance with The General Data Protection Regulation (GDPR) (EU) 2016/679 and DPA office is Andmekaitse Inspektsioon situated in Estonia, Tallinn.

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