

## PRIVACY NOTICE

### Privacy Commitment

We, at Blue Antarctic Licensing and Crew Documentation Services Inc. (Blue Antarctic for brevity), are committed to protecting privacy and staying transparent with the way we handle personal information in accordance with Data Privacy Act of 2012 under Republic Act 10173 and other applicable local & international data privacy regulations.

In this respect, Blue Antarctic have designed a privacy notice and privacy policy that shall govern the collection, usage, disclosure, protection, retention and disposal of personal data entrusted to us by our clients, suppliers, employees, flag states and other stakeholders.

### Who we are

Blue Antarctic is a filing agent for processing and securing of seafarer's flag state documentation. It is a business enterprise incorporated and registered with the Securities and Exchange Commission and with the local government of the City of Makati.

### The information we collect

We collect and process personal data from our clients only as far as necessary to facilitate application and securing of required seafarer's flag state documents. We also collect and process personal data of Blue Antarctic applicants to assess their eligibility through the different stages of the recruitment process, of Blue Antarctic employees for human resource management, and of external suppliers for purchasing requirements.

The information we collect from clients may include name, contact number, email address, business/residential address and identification document. For seafarers whose applications we process, the information may include but is not limited to seafarers' name, contact numbers, identification documents, educational records, training records, sea service records, competency records, employment, and references; name and address of next of kin. In the Blue Antarctic website, we collect name and email address information. For guests who enter Blue Antarctic's office, name of guest and may include his/her image when captured in the CCTV. For Blue Antarctic applicants and employees, the information may include but is not limited to name, email address, telephone number, CV's, identification documents, educational records, work history, employment and references. For external suppliers, we collect name, contact information, address and identification documents.

In general, we do not ask about sensitive personal data but there may be times that it is necessary for information to be disclosed especially if required by a flag state when applying for flag state documents.

### Reasons we can collect and use personal information

We intend to rely on the following lawful bases to collect and use your personal or sensitive personal data:

- (a) Your consent
- (b) Contractual obligations
- (c) Legal Obligations
- (d) Public task
- (e) Legitimate interests

## How we use personal information

To be able to deliver our services, it is important that we collect, use, process and analyse personal information when it is reasonable and necessary.

In particular, we use personal information for the following purposes, as applicable:

- Processing of seafarer's mandatory flag state documents by reviewing and ensuring completeness of application requirements prior to submission to Flag State Administration;
- Monitoring of seafarer's application status to ensure timely and efficient provision of service;
- Conducting analysis for research and marketing initiatives, including the generation of non-personally identifiable data to show statistics and other information that may be relevant for marketing purposes;
- For documentation and processing of inquiries within Blue Antarctic;
- Reference for maintaining the Quality of services supplied to clients;
- To create and nurture Blue Antarctic's business relationship with its stakeholders so that trust, mutual respect and long term association can be developed and established;
- Processing and maintenance of employees' mandatory benefits and contributions to appropriate Philippine Government Agencies such as but not limited to Social Security, PhilHealth, Pag-Ibig (HDMF) and BIR;
- Processing of remittances, payroll, and other benefits as may be applicable for employees;
- Processing and maintenance of insurance benefits with insurance providers;
- Perform such other processing or disclosure that may be required under law or regulations.

## Sources of Information

### I. Information voluntarily and personally given to Blue Antarctic.

- From Flag State application forms and other flag state required forms which the stakeholder personally accomplish or Blue Antarctic accomplishes for and in behalf of the client;
- From documents provided by clients in compliance to flag state requirements;
- From documents accomplished and provided during job application;
- From the data given during the accreditation process of Suppliers;
- From data given during signing of service contracts or similar documents;
- From the regular mail, electronic mail, phone correspondences and social media account used in communicating with Blue Antarctic;
- From Blue Antarctic's official website <https://blueantarctic.com>;
- From the information provided to Blue Antarctic during security log-in or registration when visiting or reporting to Blue Antarctic office;
- From the CCTV installed inside Blue Antarctic's office;
- From the Medical Clinics during the completion of employee's PEME and APE.

### II. Information collected during business relations and employment relations.

- From the data updates required during the course of Blue Antarctic's business relations;
- From personal documents and updates submitted during employment with Blue Antarctic;

### III. Other sources

We also collect information from commercially or publicly available sources like published directories and public documents. We may also obtain personal information from third parties and from other sources which have been given consent for the disclosure of such information and where otherwise lawfully permitted.

## Disclosure of Personal Information

Personal data shall as much as possible be kept confidential except in cases expressly permitted for by applicable data privacy regulations (e.g. Data Privacy Act of 2012 under R.A. 10173) and where such disclosure is allowed to satisfy the following requirements:

- Government mandatory reportorial requirements;
- Flag State requirements for the processing and release of mandatory seafarer's flag state document/s;
- Insurance requirements in cases of illness, injuries, death and disability;
- During natural calamities and disasters as maybe needed;
- Port Agent requirements to facilitate clearances for allowing seafarers or office representatives to join/disembark vessel in specific port/s;
- Bank requirements to facilitate proper remittance of payroll and related monetary benefits for employees;
- Third party suppliers' requirements to generate required HR service in terms of HR service providers, and medical results in terms of medical clinics;
- Training centers' requirements for generation of registration and training certificate/s.

**Nota Bene:** *Blue Antarctic will never sell, pass or rent any personal information to any outside parties which is outside the scope of its services and agreed terms and conditions of individual's engagement or business relations with the company.*

## Retention and Disposal

Blue Antarctic keeps personal data only for as long as necessary and as may be required by the following measures:

- For the fulfillment of the declared, specified and legitimate purpose/s provided above or when the processing thereof shall be relevant to the requirement and purpose by which it has been completed or terminated;
- For the establishment, exercise or defense of legal claims;
- For other business purpose/s that are consistent with applicable laws or with standards established or approved by regulatory agencies governing Blue Antarctic.

Thereafter, personal data shall be disposed or discarded in a secure manner that would prevent further processing, unauthorized access or disclosure to any other party or the general public.

## Marketing

If you are an existing client of Blue Antarctic or we are holding documents for you, we may rely on legitimate interests as the reason for contacting you in future. We will only do this where we feel it would be of benefit to you or where we need to update you in relation to our terms and conditions. We will ensure we have confidentiality agreements in place and will never disclose your information to third parties for them to use for their own marketing purposes.

## Your rights

Under RA10173, people whose personal information is collected, stored, and processed are called data subjects. Organizations who deal with personal details, whereabouts, and preferences are duty bound to observe and respect your data privacy rights. Further information about these rights can be found on the National Privacy Commission website, [www.privacy.gov.ph/know-your-rights/](http://www.privacy.gov.ph/know-your-rights/).

If you would like to exercise any of these rights, please:

- email, call or write to our Data Protection Officer
- let us have enough information to identify you
- let us have proof of your identity and address, and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

### **Protection and Security of Personal Information**

Blue Antarctic strictly enforces the privacy policy within the company and has implemented technological, organizational and physical security measures that are designed to protect personal information from unauthorized access, use, alteration and disclosure. Blue Antarctic has put in effect the following measures and safeguards:

- Blue Antarctic database utilizes a secured server behind a well-kept firewall, encryption, protection protocols and other security measures and controls;
- Observance of proper record keeping, its retention and proper disposal in accordance with the Company established and certified Quality Management System;
- Restriction of access to information to chosen, qualified and authorized company personnel;
- Conduct of regular privacy impact assessment within the organization;
- Proper physical set up of Company working spaces to ensure security of files, documents and records including use and proper safekeeping of secured and designated File Storage areas and rooms;
- Periodic privacy audit;
- Prompt notification to concerned person/s, the National Privacy Commission (NPC), and other concerned agencies for any security data breach where personal and sensitive information may be deemed compromised.

### **Data Privacy Concerns/ Complaints**

If you have data privacy related concerns or complaints then we ask that in the first instance you set this out in writing and send this to:

Blue Antarctic Data Protection Officer  
Blue Antarctic Licensing and Crew Documentation Services Inc.  
Unit 29C 114 Chatham House Condominium, Valero St., Cor. Rufino St.  
Salcedo Village Bel-Air, Makati City 1227, Philippines  
Tel. No. +632-5310-4857  
E-Mail : [dpo@blueantarctic.com.ph](mailto:dpo@blueantarctic.com.ph)

### **Amendments to Privacy Notice**

Blue Antarctic reserves the right to amend, add, change update or modify this Privacy Notice to comply with government and regulatory requirements; to adapt to new technologies and protocols; to align with industry practices; or for other legitimate purposes. Changes to our Privacy Notice will be displayed on our website. Stakeholders will always be provided notice if these changes are material and, if required by law, Blue Antarctic shall also obtain their consent.