

PRIVACY POLICY

HOW BOXX GLOBAL LTD USES AND PROTECTS PERSONAL INFORMATION

Document	IG-POL-01	Review	Annual, or following significant change
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1. ABOUT THIS POLICY

Boxx Global Ltd ("Boxx Global", "we", "us" or "our") respects your privacy and is committed to handling personal information lawfully, fairly, transparently and securely. This policy explains how we collect, use, share, retain and protect personal information when delivering vessel solutions, ship management, marine assurance, vessel inspection, offshore support, operational risk management and related consultancy services, and when you use www.bbox-global.com.

For the purposes of applicable data protection law, Boxx Global Ltd is the controller of the personal information described in this policy unless we expressly state that we are acting as a processor on a client's documented instructions. This policy is intended to meet the transparency requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable UK data protection legislation.

2. WHO THIS POLICY APPLIES TO

This policy applies to individuals whose information we handle in connection with our business, including:

- clients and prospective clients, including their directors, employees and authorised representatives;
- seafarers, offshore personnel, vessel crews, candidates, consultants and contractors;
- owners, operators, charterers, brokers, agents, port representatives, professional advisers and other business partners;
- suppliers and personnel working for external service providers;
- referees, emergency contacts and other people whose details are provided to us;
- visitors to our website, premises, vessels or events, and people who contact or subscribe to communications from us.

3. THE INFORMATION WE COLLECT

Category	Examples
Identity and contact	Name, title, date of birth where necessary, postal and email addresses, telephone numbers, nationality, identification documents and photographs.
Professional and operational	Employer, role, CV, employment and sea-service history, qualifications, certificates, licences, competencies, availability, references, performance and deployment information.
Vetting and assurance	Right-to-work or identity checks, sanctions and due-diligence results, security clearance status, background-check outcomes, incident information and evidence needed for client or regulatory assurance.
Financial and commercial	Bank details, invoicing and payment records, tax information, expenses, rates, contract details and correspondence.
Health and safety	Fitness-to-work information, medical restrictions, accessibility needs, emergency information, accident or incident details and occupational health information, where necessary and lawful.
Technical and digital	IP address, device and browser information, website usage, cookies, system logs, access records and cybersecurity monitoring data.
Communications	Emails, telephone notes, meeting records, enquiries, feedback, complaints, survey responses and preferences.

4. HOW WE OBTAIN INFORMATION

We collect information directly from you, from a client or organisation you represent, and from people authorised to act on your behalf. We may also obtain information from public professional sources, referees, screening and vetting providers, regulators, maritime databases, vessel owners or operators, agents, business partners and other lawful sources. If you give us information about another person, you should tell them that you have done so and direct them to this policy where appropriate.

5. WHY WE USE INFORMATION AND OUR LAWFUL BASES

We identify and document a lawful basis before using personal information. The basis will depend on the purpose and circumstances. We do not treat consent as the default basis where another basis is more appropriate.

Purpose	Typical lawful basis
Responding to enquiries, developing opportunities and managing client or supplier relationships.	Legitimate interests in operating and developing our business; steps requested before a contract; performance of a contract.
Planning and delivering maritime, vessel, assurance, offshore and consultancy services.	Performance of a contract; legitimate interests in effective and safe service delivery; compliance with legal obligations.
Identifying, assessing, engaging and deploying suitable employees, seafarers, contractors or consultants.	Steps before or performance of a contract; legitimate interests; legal obligation; consent only where it is genuinely optional and appropriate.

Purpose	Typical lawful basis
Verifying identity, competence, right to work, qualifications, vetting, sanctions and suitability.	Legal obligation; legitimate interests in due diligence, security, safety and fraud prevention; substantial public interest or explicit consent where required for protected data.
Managing safety, security, incidents, claims, complaints and business continuity.	Legal obligation; vital interests where applicable; legitimate interests in protecting people, assets, operations and legal rights.
Administering contracts, payments, accounts, insurance and legal claims.	Performance of a contract; legal obligation; legitimate interests in financial administration and establishing, exercising or defending legal claims.
Protecting systems, information, premises and services.	Legitimate interests in cybersecurity, fraud prevention and operational resilience; legal obligation.
Service updates and proportionate business-to-business marketing.	Consent where required; otherwise legitimate interests, subject to electronic marketing rules and the right to object.

6. SPECIAL CATEGORY AND CRIMINAL OFFENCE INFORMATION

Some operational, recruitment, assurance or safety activities may require information about health, biometric identifiers, racial or ethnic origin, religious beliefs, trade union membership, sex life or sexual orientation, or criminal allegations and convictions. We collect such information only where it is necessary, proportionate and lawful. In addition to an Article 6 lawful basis, we identify an Article 9 condition for special category information and the required UK legal condition for criminal offence information. Where required, we maintain an appropriate policy document and complete a data protection impact assessment.

We may use health information to assess fitness, restrictions, reasonable adjustments, emergency response or legal claims. Vetting information may be used where a role, client, jurisdiction or security requirement makes checks necessary. We limit access and share only the minimum information required.

7. SHARING PERSONAL INFORMATION

We do not sell personal information. We share it only where necessary for a stated purpose, where we have a lawful basis and where appropriate safeguards are in place. Recipients may include:

- clients, vessel owners, operators, charterers and project partners involved in evaluating or delivering an assignment;
- authorised employees, consultants and contractors who need the information for their role;
- professional advisers, insurers, auditors, certification bodies and financial service providers;
- IT, hosting, communications, document management, screening, travel, logistics and other service providers acting under contract;
- government departments, regulators, port or maritime authorities, law enforcement, courts and other bodies where disclosure is required or lawful;
- a purchaser, investor or adviser involved in a genuine corporate transaction, subject to confidentiality and data protection controls.

Where we use a processor, our contract requires it to act only on documented instructions, keep information secure, support individual rights and delete or return information when the service ends. We may provide aggregated or anonymised information where identification is unnecessary.

8. INTERNATIONAL TRANSFERS

Our work is global and may require personal information to be accessed or shared outside the United Kingdom. Where the destination is not covered by UK adequacy regulations, we use an approved safeguard, such as the UK International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses, together

with a transfer risk assessment and additional technical or organisational measures where needed. We may rely on a specific legal exception only where its requirements are met.

9. RETENTION AND DELETION

We keep personal information only for as long as necessary for the purpose for which it was collected, including legal, contractual, tax, insurance, safety, regulatory, audit and dispute requirements. Retention periods are set by category and take account of the sensitivity, volume, risk and operational need. When information is no longer required, we securely delete or anonymise it. A legal hold, investigation or claim may require relevant information to be retained for longer.

10. SECURITY AND DATA BREACHES

We use proportionate technical and organisational controls to protect personal information against accidental or unlawful loss, alteration, disclosure, access or destruction. Controls include access restriction, authentication, secure configuration, encryption where appropriate, backups, supplier assurance, staff awareness, incident management and review. Access is limited to people with a business need and subject to confidentiality duties. Suspected personal data breaches are investigated promptly. Where a breach is likely to risk people's rights and freedoms, we will notify the Information Commissioner's Office without undue delay and, where required, within 72 hours of becoming aware of it. We will inform affected people where the law requires this.

11. YOUR DATA PROTECTION RIGHTS

Subject to legal conditions and exemptions, you may have the following rights:

Right	What it means
Be informed	Receive clear information about how we use your personal information.
Access	Ask whether we use your information and receive a copy and related information.
Rectification	Ask us to correct inaccurate or complete incomplete information.
Erasure	Ask us to delete information where there is no lawful reason to continue using it.
Restriction	Ask us to limit use of information in specified circumstances.
Portability	Receive information you provided in a structured, commonly used, machine-readable format where the right applies.
Object	Object to processing based on legitimate interests and object at any time to direct marketing.
Withdraw consent	Withdraw consent at any time where consent is the basis, without affecting earlier lawful processing.
Automated decisions	Receive safeguards in relation to solely automated decisions that have legal or similarly significant effects.
Complain	Raise a concern with us and complain to the Information Commissioner's Office.

To exercise a right, email info@boxx-global.com. We may ask for information reasonably needed to confirm identity and locate records. We will respond without undue delay and normally within one month. The period may be extended where the law permits, and we will explain any extension, refusal or applicable exemption.

12. MARKETING, WEBSITE ANALYTICS AND COOKIES

We may send relevant business communications where permitted by law. You can opt out at any time by using an unsubscribe facility or contacting us. Opting out of marketing does not prevent necessary service, contractual or legal communications.

Our website may use essential cookies and, with consent where required, analytics or other optional technologies. Cookies are small files stored on a device that support functionality, security and usage analysis. You can manage non-essential choices through available cookie controls and browser settings. Blocking cookies may affect website functionality. Links to third-party websites are governed by those organisations' own privacy notices.

13. CHILDREN

Our services are not directed at children. We do not knowingly collect children's information through the website. If information about a person under 18 is necessary for a lawful operational purpose, we apply enhanced care, collect only what is required and involve a parent, guardian or other authorised person where appropriate.

14. COMPLAINTS AND CONTACT DETAILS

Questions, requests or concerns about this policy or our use of personal information should be sent to:

Boxx Global Ltd
Email: info@boxx-global.com
Website: www.boxx-global.com

We will investigate concerns and aim to resolve them promptly. You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority, at www.ico.org.uk. We would welcome the opportunity to address your concern before you contact the ICO.

15. REVIEW AND CHANGES

We review this policy at least annually and whenever our services, processing activities or legal obligations change. The current version will be published on our website. Material changes will be communicated where appropriate. This version takes effect from the date approved below.

APPROVAL

Approved by	Director, Boxx Global Ltd	Effective	02/09/2026
Signature	<i>J Rogerson</i>	Next review	12 months from approval