WÄRTSILÄ VOYAGE LIMITED’S PRIVACY NOTICE

Introduction

Welcome to Wärtsilä Voyage Limited’s (“Wärtsilä Voyage”) Privacy Notice.

This Privacy Notice applies to the following individuals:

- our customers, vendors, distributors, agents, service providers and other business partners (or their staff as applicable) who enter into contracts with the Wärtsilä Voyage entities established within the European Union (“EU”) and the European Economic Area (“EEA”);
- our EU or EEA based customers (or their staff as applicable) who enter into contracts with any of the Wärtsilä Voyage entities established outside the EU and EEA; and
- our website users who access and use our websites.

To be clear, if you are a candidate (applying for a role with one of our entities established in the EU or EEA) you should refer to the Wärtsilä Candidate Notice on the Wärtsilä website or, if you are a member of Wärtsilä staff (employed or contracted by one of our entities established in the EU or EEA), you should refer to the Wärtsilä Workforce Privacy Notice which is available on Compass.

Wärtsilä Voyage respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you (i) visit our websites (regardless of where you visit them from) and (ii) do business with Wärtsilä Voyage. It will also tell you about your privacy rights and how the law protects you.
This Privacy Notice contains the following information:

1. Important information and who we are.
2. The data we collect about you.
3. How your personal data is collected.
4. How we use your personal data.
5. Disclosures of your personal data.
7. Data security.
8. Data retention.

Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Notice.

1. **Important information and who we are**

**Purpose of this Privacy Notice**

This Privacy Notice aims to give you information on how Wärtsilä Voyage collects and processes your personal data through your use of our websites (including any data you may provide through our websites when you sign up to a newsletter) and/or when you do business with Wärtsilä Voyage.

**Controller**

**Customers, Suppliers, Distributors, Agents, Service Providers and Other Business Partners:** This Privacy Notice is issued on behalf of Wärtsilä Voyage and its subsidiaries so when we mention "Wärtsilä Voyage", "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company in the Wärtsilä Voyage Group responsible for processing your data. We will let you know which entity will be the controller for your data when you do business with us (this will usually be set out in the contract).

**Website Users:** Wärtsilä Voyage Limited is the controller responsible for our websites.

We have appointed a data protection team (within Legal) which is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice,
including any requests to exercise your legal rights, please contact the data protection team using the
details set out below.

Contact details

Our full details are:

Full name of legal entity: Wärtsilä Voyage Limited

Postal address: Data Protection Team (Legal Department), Wärtsilä Voyage, 2000 Lakeside North
Harbour, Western Road, Portsmouth, Hampshire, PO6 3FP UK.

Changes to the Privacy Notice and your duty to inform us of changes

This version was last updated on the date set out below and historic versions can be obtained by
contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us
informed if your personal data changes during your relationship with us.

Third-party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those
links or enabling those connections may allow third parties to collect or share data about you. We do
not control these third-party websites and are not responsible for their privacy statements. When you
leave our websites, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that
person can be identified. It does not include data where the identity has been removed (anonymous
data).

We may collect, use, store and transfer different kinds of personal data about you which we have
grouped together as follows:

- **Identity Data** includes first name and last name. We will, however, need more specific identity
data (for example, date of birth, nationality etc) if you are registering for any of our training
solutions and/or services and this will be communicated to you on registration.

- **Contact Data** includes delivery address, email address and telephone numbers.

- **Financial Data** personal payment details (solely where we contract with you as a consumer).

- **Technical Data** includes internet protocol (IP) address, your login data for our solutions and/or
services (i.e. login/username), browser type and version, time zone setting and location, browser
plug-in types and versions, operating system and platform and other technology on the devices
you use to access our websites and/or our solutions and/or services.
- **Profile Data** includes your username and password, purchases or orders made by you, your feedback and survey responses to any of our solutions and/or services.

- **Usage Data** includes information about how you use our websites, solutions and/or services.

- **Marketing Data** includes your preferences in receiving marketing from us (i.e. whether you have requested to opt out or unsubscribe from receiving any marketing from us).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**If you fail to provide personal data**

Depending on the type of personal data in question and the grounds on which we may be processing it should you decline to provide us with such data we may not be able to fulfil our contractual requirements or continue with our relationship.

For details of the legal bases that we rely on to be able to use and process your personal data please see section 4 below.

3. **How your personal data is collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and/or Financial Data (if applicable) by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply (and contract) for our solutions and/or services;
  - create an account for our solutions and/or services;
  - subscribe to our solutions, services or publications;
  - request service support for our solutions and/or services;
  - request marketing to be sent to you;
  - give us some feedback;
  - work as a business partner of ours; or
  - supply services to us.
• **Automated technologies or interactions.** As you interact with our websites and certain Wärtsilä Voyage solutions and services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. You will find additional information on this subject in the Cookies section of this Privacy Notice.

• **Third parties.** We may receive personal data about you from various third parties as set out below:
  - Technical Data & Usage Data from analytics providers such as Google based outside of the EU;
  - Profile Data in respect of surveys carried out by our marketing automation service providers;
  - Identity Data and Contact Data from third party market research companies or from delegate lists at relevant events provided such third parties obtained your prior consent;
  - Identity Data and Contact Data from your employer in respect of our training solutions or services (if and where applicable).

4. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

• Where we need to perform the contract we are about to enter into or have entered into with you (where you are a consumer).

• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

• Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in specific circumstances, including but not limited to, our use of cookies, sending direct marketing communications to you (if you are a consumer) via email or text message or where we have notified you that your consent is required. You have the right to withdraw consent at any time through our various unsubscribe links, “opt out” processes or by contacting our Data Protection Team at: Legal Department, Wärtsilä Voyage, 2000 Lakeside North Harbour, Western Road, Portsmouth, Hampshire, PO6 3FP UK.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the
specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<table>
<thead>
<tr>
<th>Purpose/Activity</th>
<th>Type of data</th>
<th>Lawful basis for processing including basis of legitimate interest</th>
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<tbody>
<tr>
<td><strong>WEBSITE USERS:</strong></td>
<td></td>
<td></td>
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<tr>
<td>To reply to enquiries</td>
<td>Identity, Contact</td>
<td>Necessary for our legitimate interests (to grow our business).</td>
</tr>
<tr>
<td>To ensure an efficient and secure use of our websites</td>
<td>Technical</td>
<td>Necessary for our legitimate interests (for network security and to prevent fraud).</td>
</tr>
<tr>
<td>To improve our websites and website user experience.</td>
<td>Technical, Usage</td>
<td>Necessary for our legitimate interests (to keep our websites updated and relevant). Consent in respect of our use of cookies and our collection, sharing and use of your data with Google Analytics.</td>
</tr>
<tr>
<td><strong>CUSTOMERS:</strong></td>
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<tr>
<td>To register new customers/ set up a subscription.</td>
<td>Identity, Contact, Profile</td>
<td>Performance of a contract with you (if you are a consumer). Necessary for our legitimate interests (to perform a contract – if you work for company).</td>
</tr>
<tr>
<td>To process and deliver orders including (but without limitation):</td>
<td>Identity, Contact, Financial (solely in respect of consumers)</td>
<td>Performance of a contract with you (if you are a consumer). Necessary for our legitimate interests (to perform a contract – if you work for company). Necessary for our legitimate interests (to recover debts due to us).</td>
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<tr>
<td>Providing the solutions and/or services in accordance with the contract;</td>
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<td>Managing payments, fees and charges; and</td>
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<td>Collecting and recovering money owed to us.</td>
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To manage our customer relationships which will include:
- Providing any support related services; and
- Notifying you about changes to our terms or Privacy Notice.

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<th>Usage</th>
<th>Technical</th>
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<td>Performance of a contract with you (if you are a consumer). Necessary for our legitimate interests (to perform a contract – if you work for a company and to perform due diligence). Necessary to comply with a legal obligation.</td>
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To provide marketing information via targeted emails or text messages (and occasionally post) to make suggestions and recommendations about solutions or services that may be of interest.

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To manage our customer relationships which will include asking you to leave a review or to take a survey.

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To use data analytics to improve our solutions and services and customer experience.

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**OTHER BUSINESS PARTNERS AND SUPPLIERS:**

To register new business partners/suppliers.

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<th>Identity</th>
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To perform and manage our contract.

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**Marketing & Opting Out**

You will receive marketing communications from us if you have requested information from us or purchased solutions or services from us or if you provided us with your details directly (at a trade show for example) and, in each case, you have not opted out (or unsubscribed) of receiving that
marketing. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a solution or service purchase, warranty registration, solution or service experience or other transactions.

We use third-party service providers to display advertisements on behalf of us across the internet. These service providers may use cookies to collect information about your visits to our websites in order to display ads while you are visiting other websites; this information cannot be used to identify you individually. Such information is anonymous; however, your IP address may be collected.

**Cookies**

Our websites use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our sites. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies on our websites:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our websites.

- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our websites when they are using them. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our websites.

- **Targeting cookies.** These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the content displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

When you use certain Wärtsilä Voyage solutions and/or services, cookies that contain information used to track your usage of such solutions/services are stored on your device. This enables our solutions/services to recognise your browser (user identification) and tell us how, when and what you used and it also enables us to recognise a return user as a unique user. By using such Wärtsilä Voyage solutions and services, you are agreeing to our use of cookies in this regard.

**How do you disable cookies?**

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our websites (or our solutions/services).

**Analytics Services**
Wärtsilä Voyage uses the services of Google Analytics, a web analytics service provided by Google Inc. Data collected by cookies about your use of the websites, solutions and/or services (including your IP address) will be transmitted to and stored by Google on behalf of Wärtsilä Voyage. Wärtsilä Voyage uses such analytics services for the purpose of evaluating usage, and providing other services relating to website activities and internet usage.

### Other third-party services

Our websites may contain links to other websites and “share” buttons (such as Twitter or Facebook) that are not operating on Wärtsilä Voyage’s behalf. Such websites, service or application providers may place their own third-party cookies on users’ computers, collect data, or solicit personal information.

Issuers of such third-party cookies have their own privacy policies. You should refer to any privacy policies from such websites, service or application providers to better understand how your information may be collected and used.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own
purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. **International transfers**

We may need to share your personal data with our Internal Third Parties and External Third Parties. This may involve transferring your personal data outside the EEA.

If your personal data is transferred outside the EEA, Wärtsilä Voyage ensures that sufficient level of data protection is maintained through appropriate safety measures, e.g. EU commission's model clauses.

7. **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we authorise access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. **Data retention**

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes or as otherwise permitted by applicable laws and regulation. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. **Your legal rights**

Under certain circumstances, you have the following rights:

- the right to be told how we use your information and obtain access to your information (commonly known as “subject access requests”);
- the right to have your information rectified or erased or place restrictions on processing your information;
- the right to object to the processing of your information e.g. for direct marketing purposes – please note that if your objection relates to us processing your personal data because we deem it necessary for our legitimate interests, we must act on your objection by ceasing such activity in question unless we can (i) show that we have compelling legitimate grounds for processing which overrides your interests or (ii) we are processing your data for the establishment, exercise or defence of a legal claim;
• the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”);
• where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
• the right to object to any decisions based on the automated processing of your personal data, including profiling; and
• the right to lodge a complaint with the supervisory authority responsible for data protection matters. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk), which we have nominated as our lead supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information
about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data (where you a consumer) where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**THIRD PARTIES**

**Internal Third Parties** means other legal entities in the Wärtsilä Voyage Group.

**External Third Parties** means other legal entities outside the Wärtsilä Voyage Group including but not limited to:

- Service providers, acting as processors, who provide operational support services (including, for example, customer support, engineering and technical services), providers of web analytics services, providers of marketing automation services, providers of outsourced IT and document storage providers where we have appropriate processing agreements in place.

- Professional advisers, acting as processors, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal and accounting services.

- Tax authorities and other regulators, acting as processors, who require reporting of processing activities in certain circumstances.