



Privacy Policy

Prepared: [July 2017]



This Privacy Policy is set out by BLUESTER GMBH, Hagener Allee 70c, 22926 Ahrensburg, Germany. It applies to all the services provided by BLUESTER GMBH its affiliates and partners and sets out how information may be collected, used and disclosed in relation to users of the [bluester] online website and/ or platform available under bluester.net its affiliated web- or microsites and is applicable also if the [bluester] website and/ or online platform its affiliated web- or microsites is/ are being used via a mobile device either through mobile applications or mobile optimized websites ('the sites').

Any changes to this Privacy Policy will be communicated by posting an amended and restated Privacy Policy on the [bluester] online platform. Once posted on the [bluester] online platform the new Privacy Policy will be effective immediately. Users agree that any information BLUESTER GMBH its affiliates and partners hold about them (as described in this Privacy Policy and whether or not collected prior to or after the new Privacy Policy became effective) will be governed by the latest version of this Privacy Policy.

BLUESTER GMBH, its affiliates and partners very strongly believe in the importance of data privacy and confidentiality. For all users of the [bluester] online platform it is important to note that servers from which the [bluester] online platform is being operated are located in Germany. As described in the BLUESTER GMBH Terms of Use the [bluester] online platform is for the use of business entities; personal user information is usually not collected in conjunction with its use. Generally it is BLUESTER GMBHs', its affiliates' and partners' aim to only collect as much information from the [bluester] online platform users as it is necessary to provide the services and to protect user's accounts.

Specifically BLUESTER GMBH does not collect any data in order to determine trading routes or patterns or to conclude any other kind of identifiable business patterns. If any kind of statistical research on logged data will be conducted, for example to offer market reports to [bluester] customers, it will be conducted strictly in anonymized and non-identifiable form.

1. Information collected and used

1.1 Information including, but not limited to, user name, business entity name and address, billing address, phone number, fax number, email address, VAT number ("registration information") may be collected at the time of user's registration on the [bluester] online platform.

1.2 In conjunction with the provision of other service features or functions on the [bluester] online platform, data including but not limited to basic buyer or supplier company information (number of employees, years in business, number of vessels, etc.), vessel specific information (IMO number, LOA, BOA, etc.), vessel equipment specific information (for example type and items of safety equipment or other including class certificate information and documentation) and service supplier specific information (service capabilities and accreditations, etc.) may be collected ('account information').

1.3 In connection with payment of the services information, including but not limited to, bank account numbers, billing information, credit/ debit card numbers and expiration dates ('payment information') may be collected to, among other things, facilitate future payments.



1.4 User's activities on the [bluester] online platform may be recorded and retained; such may be but not limited to RFQs or offers filed/ posted as well as detailed information contained therein (for example: ports, equipment types concerned, service prices, etc.) ('activity information'). This information is retained in order to facilitate future use of the services (for example by providing data already entered during a new RFQ so that the new RFQ process is being facilitated and accelerated for user's convenience). Further this type of information may also be used to offer additional services to users of the [bluester] online platform, such as for example safety regime management/ optimization aides.

1.5 With the aim to enhance services BLUESTER GMBH, its affiliates and partners may carry out questionnaires among its users. In conjunction with these, as well as during trade shows, industry events and other personal information will be requested, collected and retained. The information that may be collected at these occasions may include, but is not limited to, user name, address, phone number, fax number and email address ('questionnaire/ event information').

1.6 Registration information, account information, payment information, activity information, questionnaire/ event information and browsing information generally relate to business entities and are together referred to as 'business data'. Insofar and only insofar as they constitute personally identifiable data of living individuals, such information are together referred to as 'personal data' hereafter. For users of the [bluester] online platform it is mandatory to provide certain categories of business data and personal data (as specified at the time of collection). In the event that users do not provide any or sufficient business data and/ or personal data marked as mandatory on the [bluester] online platform, registration process or provision of the services or part thereof may not be possible.

2. Use of business and personal data

Users of the [bluester] online platform acknowledge and expressly agree that business and personal data provided may be used for the following purposes:

- verifying of user's identity;
- verifying user's eligibility to register as a user of the sites;
- processing user's registration as a user, providing user with a log-in ID for the [bluester] online platform and maintaining and managing user's registration;
- providing users with customer service and responding to user's queries, feedback, claims or disputes;
- to facilitate communication between buyers and suppliers on the [bluester] online platform;
- performing research or statistical analysis for marketing and promotional purposes or in order to improve the content and layout of the [bluester] online platform or to improve the services;
- subject to obtaining user's consent in such form as may be required under the applicable law, user's name, phone number, residential address, email address and fax number may be used to provide notices, surveys, product alerts, communications and other marketing materials to users relating to the services.
- if users voluntarily submit any information for display on the [bluester] online platform, including but not limited to, company profile, service catalog and licenses or other users



are deemed to have given consent to the display of such information on the [bluester] online platform ('voluntary information'); and

- making such disclosures as may be required for any of the above purposes or as required by law or in respect of any claims or

3. Disclosure of business and personal data

3.1 Users acknowledge and agree that BLUESTER GMBH its affiliates and partners may disclose and transfer user's business or personal data to service providers engaged by BLUESTER GMBH its affiliates or partners to assist BLUESTER GMBH its affiliates or partners with providing users with the services (including but not limited to data entry, database management, promotions, products and services alerts, delivery services, payment extension services, and membership authentication and verification services) ('service providers'). These service providers are under a duty of confidentiality to BLUESTER GMBH its affiliates and partners and are only permitted to use user's business or personal data in connection with the purposes specified above, and not for their own purposes (including direct marketing).

3.2 When necessary BLUESTER GMBH its affiliates or partners may also disclose and transfer user's business or personal data to professional advisers, law enforcement agencies, insurers, government and regulatory and other organizations if circumstances arise or claims are being brought forward to BLUESTER GMBH which deem such action necessary.

3.3 Any business or personal data supplied by users will be retained by BLUESTER GMBH its affiliates or partners and is accessible by BLUESTER GMBHs its affiliates or partners employees, any of their service providers and third parties referred to above, for or in relation to any of the purposes stated above.

3.4 All voluntary information may be made publicly available on the [bluester] online platform and therefore accessible by any of its users. Any voluntary information becomes public information and users relinquish any proprietary rights (including but not limited to the rights of confidentiality and copyright) in such information. Users should therefore exercise caution when providing voluntary information.

3.5 Account information may be disclosed to banks in order to enable financial transactions. It also may be used to determine a user's credit-worthiness and in the process of such determination may be disclosed to banks or credit agencies as well. Despite the use of up-to-date technology and internal procedures to keep user's account information and other business or personal data secure from intruders, the risk of theft, loss or misuse of these data cannot fully be eliminated.

3.6 Statistical information eventually will be made available to third parties, however personally identifying information not without user's permission.

3.7 On the [bluester] online platform access to other parties and their websites may be offered either through the use of hyperlinks to these sites or through offering 'co-branded' sites in which both BLUESTER GMBH, its affiliates and partners and other parties share the same uniform resource locator, domain name or pages within a domain name on the internet. In order to use



these third party's or co-branded offerings or websites users may be required to submit personal information to register or apply for products or services. This Privacy Policy does not apply to these third party sites or co-branded sites. The privacy policies of those other parties may differ and BLUESTER GMBH, its affiliates and partners do not have control over the information submitted to those third parties. Users should read the relevant privacy policy for those third party sites and co-branded sites before responding to any offers, products or services advertised by those parties on the [bluester] online platform.

4. Right to access/ correct business and personal data

Users have the right of access to business and personal information held by BLUESTER GMBH, its affiliates and partners and to request correction of the information under the applicable laws.

Questions regarding this Privacy Policy shall be addressed to legal@bluester.net or sent by courier to BLUESTER GMBH, Hagener Allee 70c, 22926 Ahrensburg, Germany.

Requests in regards to the access or change of business or personal data shall be directed to support@bluester.net. In accordance with the applicable laws, BLUESTER GMBH, its affiliates and partners reserves the right to charge reasonable fees for the processing of any data access or correction request.

5. Use of cookies

How Bluester GmbH uses and manages the use of cookies is described within its Cookie Policy which in its updated version is to be found on bluester.net or by following this link:

6. Minors

The Sites and their contents are not targeted to minors (those under legal age). If a minor has provided BLUESTER GMBH its affiliates and partners with personal information without parental or guardian consent, the parent or guardian should contact legal@bluester.net or BLUESTER GMBH, Hagener Allee 70c, 22926 Ahrensburg, Germany to request removal of the information.

7. Security Measures

BLUESTER GMBH its affiliates and partners employ commercially reasonable security methods to prevent unauthorized access to the services, to maintain data accuracy and to ensure the correct use of the information held.

Registration information and account information (if any) can be viewed and edited through the account, which is protected by a password. It is strongly recommend to not divulge a password to anyone. BLUESTER GMBH its affiliates and partners staff will never ask a user for his/ her password in an unsolicited phone call or in an unsolicited email. If a shared computer is being used, log-in information (e.g., user ID and password) should not be saved on that shared computer. It should always be remembered to sign out of a user account and to close the browser window used when having finished a session. Also access data must be amended regularly.



No data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. BLUESTER GMBH its affiliates and partners try to protect the information given by users, but cannot guarantee the security of any information transmitted despite all security measures employed. Therefore users should be aware that any information is being provided at own risk.

Prepared and published by:

BLUESTER GMBH
Hagener Allee 70c
22926 Ahrensburg
Germany

+ 49 4102 607 69 22
legal@bluester.net

Registration Court:
District Court Lübeck (Germany) . HRB 16376 HL
Managing Directors: Christoph Oliver Kiese, Sebastian Peter Fischer
VAT Identification Number: DE309945670