



RECRUITMENT PRIVACY NOTICE

STARBULK S.A., with an established Law 89 office at 40, Agiou Konstantinou street, 15124 (“**We**”, “**Us**”, “**Our**”, “the **Company**”) is committed to protecting and respecting your privacy. This Recruitment Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our resourcing and recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“**GDPR**”) the Data Controller is the Company. You may contact the Company by sending an e-mail at hr@starbulk.com

Your Personal Information **Information We collect from You**

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, date of birth, qualifications, experience, information relating to your employment history, skills and experience, marital status, identification details, certifications, medical information, that you provide to Us.
- If you contact Us, We may keep a record of that correspondence.

We obtain personal data from third party sources or partners such as:

- References from your named referees;
- Information from your referrer (where applicable);
- Verification of information provided during the recruitment process by contacting relevant third parties (for example, previous employers, education and qualification providers) or using publicly available sources (for example, to verify your experience, education and qualifications); and
- Information from Our recruitment/ resourcing agents.

You will be told in advance by the Company performing the Pre-Employment Checks that examine which aspects of your application data will be verified and how.

The Company will only process your application data where We have a legal basis for doing so, as referred in next section below.



How We Use Your Information

Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

Other bases of processing could be “contract performance” where the information is strictly necessary for Us to perform the contract with you, or your prior consent where appropriate. We process your data related to participation in voluntary corporate activities or to the provision of benefits only upon your prior consent. Such consent is subject to withdrawal at any time. Sometimes, We process information due to the fact that such processing is necessary to comply with a legal obligation (e.g. transfer of data to supervisory authorities), or to enable Us to pursue Our legitimate business interests, e.g. so We can deliver an effective recruitment service.

Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied;
- To consider your application in respect of other roles;
- To communicate with you in respect of the recruitment process;
- To enhance any information that We receive from you with information obtained from third party data providers;
- To find appropriate candidates to fill Our job openings;
- To keep records in relation to recruiting and hiring;
- To ensure compliance with potential legal requirements.

Automated decision making/profiling

We do not perform any processing activity, which includes automated individual decision making. Once the Company initiates such processing, it will update this Recruitment Privacy Notice accordingly.

Transfers – Disclosures

The Company does not sell or trade applicants’ data to any third party. The Company may be obliged to disclose certain applicants’ data to third parties, such as government authorities, in accordance with applicable laws. It may also be necessary for the Company to disclose applicants’ data to protect the legal rights of the Company, again in accordance with applicable laws. Apart from the above, the Company will not transfer any personal data referred under the present Recruitment Privacy Notice to third parties (including such parties’ subsidiaries, or affiliated companies) without you first be notified, and in certain cases only upon your prior consent.

This information will not be transferred to a country outside European Union/ European Economic Area (EU/EEA) where there is no adequate level of protection. Should We transfer your personal data or share them with others beyond the EU/EEA, you will be promptly and specifically informed via any appropriate means. In addition, We will have ensured that We and these persons or companies to which the data are transferred undertake to protect the data from any inappropriate use or disclosure in accordance with the applicable European or national legislation



on data protection, using standard clauses or other appropriate mechanisms to safeguard the protection of your personal information.

How We Secure Your Personal Data

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach.

We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Where We Store your Personal Data

Your personal data is stored on Our secure systems and servers within Greece.

How long We Keep your Personal Data

In the event your application is not considered in respect of a role for which you have applied, We will keep all your application data for a period of two (2) years in case that another suitable vacancy becomes available by the Company, unless you do not provide your consent.

Subject to the above deadlines, or upon their lapse, your information will be destroyed upon your request unless applicable law requires destruction after the expiration of an applicable retention period. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your information given the level of sensitivity, value and criticality to Us.

Your rights

Under the applicable legislation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Recruitment Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to Our continued processing of your personal data
- otherwise restrict Our processing of your personal data in certain circumstances
- claim compensation for damages caused by Our breach of any data protection laws.



For further information on each of those rights, including the circumstances in which they apply, please contact the Data Protection Officer of the Company or the Greek Supervisory Authority for the protection of personal data.

Also, if you would like to exercise any of those rights, please:

1. contact us using the details in the **Contact Us** section below,
2. let Us have enough information to identify you,
3. let Us have proof of your identity and address, and
4. let Us know the information to which your request relates.

Contact Us

All questions, comments and requests regarding this Recruitment Privacy Notice should be addressed to Data Protection Officer at the Company, who may be contacted via email at: DPO@maritimedpo.com.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information. The applicable legislation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Greece is the Hellenic Data Protection Authority, which may be contacted at e-mail: contact@dpa.gr or telephone: +30 210 6475600.

Changes in this Recruitment Privacy Notice

We may update this Recruitment Privacy Notice from time to time in response to changing legal, technical or business developments. When We update Our Recruitment Privacy Notice, We will take appropriate measures to inform you, consistent with the significance of the changes We make. We will obtain your consent to any material Recruitment Privacy Notice changes if and where this is required by applicable data protection law.