WORK SHIPPING COMPANY

PRIVACY POLICY
(POLICY ON PERSONAL DATA PROCESSING)

Version dated 4 September 2026

Controller	Limited Liability Company “Work Shipping Company” (ООО «Ворк Шиппинг Компани»)
Short name	Work Shipping Company LLC
ОГРН	1203900004021
INN / KPP	3912015708 / 780501001
Registered address	198095, Russian Federation, Saint Petersburg, Narvsky Municipal District, 29 Ivana Chernykh Street, Litera A, floor/premises/part of premises 4/23-N/6 (official Russian address: 198095, г. Санкт-Петербург, вн. тер. г. муниципальный округ Нарвский округ, ул. Ивана Черных, д. 29, литера А, этаж/помещ./часть помещ. 4/23-Н/6)
Email	info@workshipping.com
Website	https://workshipping.com

This Policy is a publicly available document and applies together with separate consents given by personal data subjects.

1. General provisions

1.1. This Privacy Policy (Policy on Personal Data Processing) (the “Policy”) sets out the principles, purposes, legal grounds, procedures and conditions for processing personal data and the measures used to protect such data by Work Shipping Company LLC (the “Controller”).

1.2. The Policy is prepared in accordance with the Constitution of the Russian Federation, Federal Law No. 152-FZ dated 27 July 2006 “On Personal Data”, Federal Law No. 149-FZ dated 27 July 2006 “On Information, Information Technologies and Information Protection”, the Labour Code of the Russian Federation and other applicable laws.

1.3. The Policy applies to personal data obtained through https://workshipping.com, email, telephone, messengers, paper and electronic application forms, and during interaction with candidates, seafarers, clients and partners.

1.4. The Policy applies to website visitors, candidates, seafarers and applicants, persons sending enquiries, representatives of clients, shipowners and partners, and other individuals whose personal data are lawfully obtained by the Controller.

1.5. The Policy does not apply to third-party websites or services accessible through external links. Such third parties independently determine the purposes and conditions of processing on their resources.

1.6. In the event of any discrepancy between the Russian and English versions, the Russian version prevails.

1.7. This Policy is not a consent to personal data processing. Where consent is required by law, it is requested separately from other documents and information.

2. Key terms

2.1. Personal data means any information relating directly or indirectly to an identified or identifiable individual.

2.2. Processing means any operation or set of operations performed on personal data, including collection, recording, organisation, accumulation, storage, amendment, retrieval, use, transfer, anonymisation, blocking, deletion and destruction.

2.3. Automated processing means processing using computing equipment.

2.4. Disclosure to a recipient means disclosure of personal data to a specific person or a defined group of persons.

2.5. Dissemination means disclosure of personal data to an indefinite group of persons.

2.6. Cross-border transfer means transfer of personal data to the territory of a foreign state, to a foreign public authority, individual or legal entity.

2.7. Anonymisation means actions making it impossible to identify the data subject without additional information.

2.8. Destruction means actions after which the content of personal data cannot be restored.

2.9. Website means the materials, software and databases available at https://workshipping.com.

3. Processing principles

3.1. The Controller processes personal data lawfully and fairly and only for specific, predetermined and legitimate purposes.

3.2. Processing incompatible with the collection purposes, combining databases with incompatible purposes, processing excessive data and retaining data longer than necessary are not permitted.

3.3. The Controller ensures accuracy, sufficiency and relevance of data, confidentiality and appropriate protection against unlawful or accidental access.

3.4. Dissemination to an indefinite group of persons is permitted only where a separate lawful ground exists and, where required, separate consent has been obtained.

3.5. The Controller does not make decisions producing legal effects for the data subject or otherwise significantly affecting the subject's rights and legitimate interests solely on the basis of automated processing, unless permitted by law or separate consent.

4. Categories of data subjects and personal data

4.1. Website visitors

IP address, cookie and session identifiers, browser, operating system and device information, access date and time, pages visited, referral source, technical logs, consent preference records and information security events.

4.2. Persons making enquiries and representatives of clients and partners

Full name; organisation and position; telephone number; email address; messenger identifier; the content of enquiries and correspondence; and other information voluntarily provided by the individual.

4.3. Candidates, seafarers and applicants

- full name, photograph, date and place of birth, age and citizenship;
- contact details and residential or registered address;
- desired position, availability to join a vessel and expectations regarding working conditions;
- passport details, seaman's book details and other identification document details;
- education, qualifications, specialty, certificates, endorsements, training and language skills;
- sea service history, vessels, ranks, employers, reasons for leaving previous contracts, previous remuneration and professional references;
- marital status, children, next of kin or emergency contact details only to the extent necessary at the relevant onboarding stage;
- height, shoe and clothing sizes only where objectively necessary for work arrangements and personal protective equipment;
- information contained in the application form, CV, attachments and correspondence;
- technical data relating to the submission and consent: date and time, IP address, browser and device information, and the version of the form and consent text.

4.4. Special categories, criminal record data and biometric data

Health information and medical documents are processed only on the basis of separate written consent or another ground expressly provided by law. Criminal record data are processed only in the cases and manner prescribed by federal law. A photograph is not used by the Controller for biometric identification without a separate lawful ground.

4.5. Personal data of third parties

Where a candidate provides details of a relative, emergency contact or referee, the candidate must have a lawful ground for such disclosure and inform that person about the Controller, the processing purposes and the manner in which rights may be exercised. The Controller uses such data only for the stated purpose and to the minimum extent necessary.

5. Processing purposes and legal grounds

The Controller determines the purpose, data categories and legal ground for each processing activity. The principal activities are set out below.

Purpose	Processing activity	Legal grounds
Website operation and security	Display of pages, storage of language and cookie preferences, prevention of abuse, error diagnostics and protection of information systems.	Compliance with law; exercise of the Controller's rights and legitimate interests provided the subject's rights are respected; technical necessity.
Handling enquiries	Responding to requests, arranging communication, preparing proposals and taking pre-contractual steps at the subject's request.	Consent; steps taken at the subject's request before entering into a contract; performance of a contract.
Recruitment and placement of seafarers	Reviewing applications, assessing qualifications and experience, contacting candidates, matching vacancies, checking documents, arranging interviews and preparing employment or other contractual arrangements.	Consent; pre-contractual steps at the subject's request; exercise of rights and duties under applicable law.
Candidate database	Offering suitable vacancies and maintaining professional contact after a specific recruitment process has ended.	Separate candidate consent.
Disclosure to potential employers and partners	Assessment by shipowners, employers, vessel operators and crewing/manning agents; organisation of employment and voyage arrangements.	Consent; steps taken at the subject's request; performance of a contract; other lawful grounds.
Analytics and interactive map	Obtaining anonymised or pseudonymised website usage statistics, improving the interface and loading the interactive office map.	Consent to optional cookies and external services.
Legal compliance and protection of rights	Compliance with public authority requests, record keeping, handling claims and disputes, fraud prevention and protection of legitimate interests.	Compliance with law; exercise of the Controller's and third parties' rights and legitimate interests.

6. Procedures, methods and retention periods

6.1. Processing is carried out by automated, non-automated or mixed methods, with or without transmission over the Controller's internal network and information and telecommunications networks.

6.2. The Controller may collect, record, organise, accumulate, store, amend, retrieve, use, compare, disclose, provide access to, anonymise, block, delete and destroy personal data to the extent required for the relevant purpose.

6.3. Data relating to a specific vacancy are processed until the relevant recruitment process is completed and, where no other legal ground applies, are destroyed no later than 30 days after the purpose is achieved. Where separate consent is given for inclusion in the candidate database, data are retained for no more than 3 years from the application date or until consent is withdrawn, whichever occurs first.

6.4. Enquiry and business correspondence data may be retained for up to 3 years after the interaction ends, unless a longer period is required by law, contract or for the protection of rights.

6.5. Website logs, necessary identifiers and records of consent preferences may be retained for up to 12 months. Optional analytics data are retained within the settings of the relevant service and no longer than necessary for the stated purpose.

6.6. Documents relating to concluded contracts, employment, accounting, tax and personnel records are retained for the periods prescribed by law and applicable archival rules.

6.7. Once the purpose is achieved, consent is withdrawn or a lawful request is received, data are destroyed or anonymised within the statutory periods unless another legal ground requires continued processing.

6.8. If immediate destruction is not possible, the data are blocked and destroyed within the period prescribed by law. Destruction is documented as required by applicable regulations.

7. Recipients and processing on behalf of the Controller

7.1. Access to personal data is granted only to employees and authorised persons of the Controller who require it for their duties.

7.2. For the stated purposes, the Controller may disclose necessary data to clients, prospective employers, shipowners, vessel operators and crewing/manning agents and, at later stages, to training, visa, migration, insurance, medical, transport and other organisations involved in onboarding and supporting the candidate.

7.3. Processing may be entrusted to providers of hosting, email, information systems, document storage, technical support, analytics and mapping services. The relevant instructions specify the purposes, data and operations, confidentiality and security requirements, and incident notification duties.

7.4. Data may be disclosed to public authorities and other persons where disclosure is required by law or necessary to protect the rights of the Controller or the data subject.

7.5. The Controller does not sell personal data and does not disclose them to an indefinite group of persons without a separate lawful ground.

8. Localisation and cross-border transfers

8.1. When collecting personal data of Russian citizens over the Internet, the Controller ensures recording, organisation, accumulation, storage, amendment and retrieval using databases located in the Russian Federation, except where expressly permitted by law.

8.2. Due to the international nature of maritime employment, it may be necessary to transfer data to foreign shipowners, employers, vessel operators, agents and service providers.

8.3. Before a cross-border transfer begins, the Controller complies with Article 12 of Federal Law No. 152-FZ, obtains the required information on recipients and security measures, assesses processing conditions and submits a separate notification of the intended cross-border transfer to Roskomnadzor.

8.4. The data and scope of transfer are limited to the minimum necessary. Countries, recipients and purposes are determined for the specific vacancy or contract and are communicated to the subject to the extent required by law.

8.5. No cross-border transfer is made where there is no lawful ground, mandatory procedures have not been completed, or Roskomnadzor has prohibited or restricted the transfer.

9. Cookies and external internet services

9.1. The Website uses strictly necessary cookies and similar technologies to store language and privacy preferences, ensure security, operate pages and diagnose errors.

9.2. Optional analytics technologies, including Yandex Metrica and Webvisor, are loaded only after the user’s consent. They may receive device and browser information, IP address, cookie identifiers, pages visited, referral source and website interactions.

9.3. The interactive Yandex Map on the Contacts page is external content and is loaded only after the relevant user consent.

9.4. Users may accept all optional technologies, reject them or change their choice through Cookie settings. Rejecting optional technologies does not restrict access to the Website’s core content, although the interactive map and certain analytics functions will not load.

9.5. Third-party services may independently process data received by them under their own terms. The Controller selects providers with regard to data protection requirements and limits their integration to the stated purposes.

10. Personal data security

10.1. The Controller applies necessary legal, organisational and technical measures to protect personal data against unlawful or accidental access, destruction, alteration, blocking, copying, disclosure, dissemination and other unlawful actions.

10.2. Measures include appointing a responsible person, adopting internal rules, restricting and logging access, authentication and security controls, backups, anti-malware and other safeguards, contractor oversight, staff training and periodic assessment of security effectiveness.

10.3. Where an incident is identified, the Controller takes measures to contain it and remedy its consequences and provides the notifications required by law within the applicable time limits.

11. Data subject rights and requests

11.1. A data subject may obtain information about processing and request correction, blocking or destruction of data that are incomplete, outdated, inaccurate, unlawfully obtained or unnecessary for the stated purpose.

11.2. A data subject may withdraw consent, request cessation of processing, object to marketing communications, and lodge a complaint with Roskomnadzor or a court.

11.3. Requests may be sent to info@workshipping.com or to the Controller's registered address. A request must allow the applicant to be identified and describe the requirement. Where necessary, the Controller may request information confirming identity and a representative's authority.

11.4. The Controller considers requests and responds within the periods prescribed by Russian law.

11.5. Where inaccuracy is confirmed, data are corrected; data unlawfully obtained or unnecessary for the stated purpose are blocked and destroyed in accordance with law.

12. Final provisions

12.1. The Controller may amend the Policy where legislation, technologies, data categories or processing activities change. A new version applies from publication unless otherwise stated.

12.2. The current version is published at https://workshipping.com and is accessible from the footer and from the page on which personal data are collected.

12.3. The English version is provided for convenience. In the event of discrepancy, the Russian version prevails.

12.4. Questions concerning personal data processing may be sent to info@workshipping.com.

12.5. Effective date of this version: 4 September 2026.