



## Privacy Policy

Welcome, and thank you for your interest in Holship A/S (“Holship”, “we,” or “us”), our website at [www.holship.com](http://www.holship.com), and all related websites and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communications with individuals though from written or oral means, such as email or phone - collectively, together with the Site.

This Privacy Policy (“Policy”) describes the information that we gather on or through the Site and services, how we use and disclose such information, and the steps we take to protect such information. By visiting or on Site, or by purchasing our Products, you accept the privacy practices described in this Policy.

This Policy is incorporated into and is subject to, the Holship Terms and Conditions. Capitalized terms used but not defined in this Policy have the meaning given to them in the Holship Terms and Conditions.

### Definitions

- **“Client”** means a customer of Holship.
- **“Client Data”** means personal data, reports, addresses, and other files, folders or documents in electronic form.
- **“Personal Data”** means any information relating to an identified or identifiable natural person.
- **“Public Area”** means the area of the Site that can be accessed both by Users and Visitors, without needing to log in.
- **“Restricted Area”** means the area of the Site that can be accessed only by Users, and where access requires logging in.
- **“User”** means an employee, supplier, or representative of a Client, who primarily uses the restricted areas.
- **“Visitor”** means an individual other than a User, who uses the public area but has no access to the restricted areas of the Site or our portfolios.

## 2. The Information We may collect on the Site:

We collect different types of information from or through correspondence. The legal bases for Holship’s processing of personal data are primarily that the processing is necessary for providing customer relations and services in accordance with Holship’s “Terms and conditions” and that the processing is carried out in Holship’s legitimate interests, which are further explained in the section “How We Use the Information We Collect” of this Policy. We may also process data upon your consent, asking for it as appropriate.

### 2.1 User-provided Information

When you use our services, as a User or as a Visitor, you may provide, and we may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number, and credit card or other billing information. Personal Data also includes other information, such as geographic area or preferences, when any such information is linked to information that identifies a specific individual. You may provide us with Personal Data in various ways.

### 2.2 Information Collected by Clients

A Client or User may store or upload Personal Data. Each Client is responsible for providing notice to its customers and third persons concerning the purpose for which Client collects their Personal Data and how this Personal Data is processed.

### 2.3 “Automatically Collected” Information

When a User or Visitor uses our Site or otherwise correspond with us, we may automatically record certain information from the User’s or Visitor’s device by using various types of technology, including cookies, “clear gifs” or “web beacons.” This “automatically collected” information may include IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Site, and the dates and times of the visit, access, or use of the Site. We also may use these technologies to collect information regarding a Visitor or User’s interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message. This information is gathered from all Users and Visitors.

### 2.4 Information from Other Sources

We may obtain information, including Personal Data, from third parties, such as our partners, advertisers, credit rating agencies, and other integrated services. If we combine or associate information from other sources with Personal Data that we collect through the Site or other conversation platforms, we will treat the combined information as Personal Data in accordance with this Policy.

## 3. How We Use the Information We Collect

We use the information that we collect in providing our products and services and to maintain the relationship between you and Holship.

### 3.1 Operations

We use the information of personal data to operate, maintain, enhance and provide all the Holship portfolios, to provide the service and information that you request, to respond to comments and questions and to provide service to the Clients and Users.

### 3.2 Improvements

We use the information to understand and analyze the usage trends and preferences of our Visitors and Users, to improve our services, and to develop new products and services.

### 3.3 Communications

We may use a Visitor’s or User’s email address or other information to contact that Visitor or User for administrative purposes such as customer service, relating to products and services offered by us or by third parties we work with.

### 3.4 Cookies and Tracking Technologies

We may use automatically collected information and other information through cookies and similar technologies to:

- Personalize our Site, such as remembering a User’s or Visitor’s information so that the User or Visitor will not have to re-enter it during a visit or on subsequent visits
- Provide customized advertisements, content, and information
- Monitor and analyze the effectiveness of Site and third-party marketing activities
- Monitor aggregate site usage metrics such as total number of visitors and pages viewed
- Track your entries, submissions, and status in any promotions or other activities on the Site.

#### 4. To Whom We Disclose Information

Except as described in this Policy, we will not intentionally disclose the Personal Data or Client Data that we collect or store to third parties without the consent of the applicable Visitor, User or Client. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

##### 4.1 Unrestricted Information

Any information that you voluntarily choose to include in a public area, such as a public profile page, will be available to any Visitor or User who has access to that content.

##### 4.2 Service Providers

We work with third-party service providers who provide the website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data or Client Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

##### 4.3 Non-Personally Identifiable Information

We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including

- compliance with various reporting obligations
- business or marketing purposes

##### 4.4 Law Enforcement, Legal Process, and Compliance

We may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to

- Take precautions against liability
- Protect ourselves or others from fraudulent, abusive, or unlawful uses or activity
- Investigate and defend ourselves against any third-party claims or allegations
- Protect the security or integrity of the portfolios of Holship
- protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others.

##### 4.5 Change of Ownership

Information about Users and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets and only if the recipient of the User or Visitor Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

Client Data may be physically or electronically transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an

insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, for the sole purpose of continuing the operation of the service, and only if the recipient of the Client Data commits to a Privacy Policy that has terms substantially consistent with this Privacy Policy.

## 5. Your Choices

### 5.1 Access, Correction, Deletion

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided to us. If you wish to access or amend any other Personal Data we hold about you or to request that we delete or transfer any information about you that we have obtained, you may contact us as set forth in the “How to Contact Us” section. At your request, we will have any reference to you deleted or blocked in our database.

Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of our products.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact Holship’s Data Protection Officer at [holship@holship.com](mailto:holship@holship.com). You also have a right to lodge a complaint with data protection authorities, in Denmark: Datatilsynet, Borgergade 28,5, 1300 København K.

### 5.2 Opting out from Commercial Communications

If you receive commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the “How to Contact Us” section.

Holship has no direct relationship with the Client’s customers or third party whose Personal Data it may process on behalf of a Client. An individual who seeks access, or who seeks to correct, amend, delete inaccurate data or withdraw consent for further contact should direct his or her query to the Client or User they deal with directly. If the Client requests Holship to remove the data, we will respond to its request within thirty (30) days. We will delete, amend or block access to any Personal Data that we are storing only if we receive a written request to do so from the Client who is responsible for such Personal Data unless we have a legal right to retain such Personal Data.

We reserve the right to retain a copy of such data for archiving purposes or to defend our rights in litigation. Any such request regarding Client Data should be addressed as indicated in the “How to Contact Us” section and include sufficient information for Holship to identify the Client or its customer or third party and the information to delete or amend.

## 6. Third-Party Services

Our services may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators’ policies, if any, governing privacy and security. We are not

responsible for the content or privacy and security practices and policies of third-party sites. We encourage you to learn about third parties' privacy and security policies before providing them with information.

## 7. Minors and Children's Privacy

Protecting the privacy of young children is especially important. Our Site is not directed to children under the age of 18, and we do not knowingly collect Personal Data from children under the age of 18 without obtaining parental consent. If you are under 18 years of age, then please do not use or access the Site at any time or in any manner. If we learn that Personal Data has been collected on the Site from persons under 18 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Site, then you may alert us at [holship@holship.com](mailto:holship@holship.com) and request that we delete that child's Personal Data from our systems.

The Site is not intended to be used by minors and is not intended to be used to post content to share publicly or with friends. To the extent that a minor has posted such content on the Site, the minor has the right to have this content deleted or removed using the deletion or removal options detailed in this Privacy Policy. If you have any question regarding this topic, please contact us as indicated in the "How to Contact Us" section.

## 8. Data Security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use SSL technology to encrypt data during transmission through public internet, and we also employ application-layer security features to further anonymize Personal Data.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the "How to Contact Us" section.

If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

## 9. Data Retention

We only retain the Personal Data collected from a User for as long as we need it to fulfill the purposes for which we have initially collected it unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements as follows:

Billing information is retained for a period of respectively 5, 7 or 10 years, depending on the local laws, as of their provision to Holship in accordance with the Danish accounting and taxation laws information on legal transactions between Client and Holship is retained for a period of 5 years as of their provision to Holship in accordance with the general limitation period set for civil claims in the Danish General Part of the Civil Code Act.

## 10. Data Transfer

We may transfer, process and store Personal Data we collect through providing our services and portfolios in centralized databases and with service providers located outside of EU. Other countries may not have the same data protection framework as the country where you stay. If we transfer Personal Data to the countries outside of EU., we will protect it as described in this Privacy Policy.

## 11. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Site, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Site and portfolios after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

## 12. How to Contact Us

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at [holship@holship.com](mailto:holship@holship.com). If you have any concerns or complaints about this Policy or your Personal Data, you may contact Holship Data Protection Officer by email at [holship@holship.com](mailto:holship@holship.com).

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