

PRIVACY POLICY

To submit a request regarding your data rights, the most efficient method is to contact us at info@radshipbrokers.com or through our standard communication channels. We review and process all inquiries in strict accordance with relevant data protection statutes. For a comprehensive understanding of our data practices, please read this privacy notice in its entirety.

1. INFORMATION GATHERED BY THE COMPANY.

We collect personal information that you intentionally provide when expressing interest in our company, products, or Services, when participating in platform activities, or when reaching out to us directly. This includes details voluntarily shared during the negotiation of chartering contracts or ship sale and purchase transactions. While we do not intentionally process sensitive personal information, we may collect corporate documentation that includes personal identifiers of directors or beneficial owners as required for maritime compliance and KYC purposes. It is your responsibility to ensure that all information provided to us is accurate, current, and complete, and you are required to inform us of any significant updates. Additionally, as you interact with our Services, we automatically log certain technical data such as your IP address, browser type, device identifiers, and language settings. This information, while not identifying you by name, is essential for maintaining the integrity and security of our operations and for internal diagnostic purposes.

2. UTILIZATION OF YOUR DATA.

We handle your personal information for several functional reasons depending on your engagement with our Services. This includes processing data to deliver and manage our shipbroking services, facilitate professional communication, prevent fraudulent activity, and ensure legal compliance within the maritime sector. We may also process data when deemed necessary to safeguard an individual's physical safety or to mitigate the risk of harm in high-risk environments. If you grant explicit consent for specific secondary purposes, we will process your data accordingly, noting that such consent may be withdrawn at any time by contacting us at the address provided above.

3. LEGAL GROUNDS FOR DATA PROCESSING.

In accordance with the General Data Protection Regulation (GDPR) and UK GDPR, we only handle your personal data when there is a valid legal justification. Our operations rely on explicit consent, adherence to legal mandates (including maritime and AML statutes), the fulfilment of contractual duties regarding vessel fixtures, and the pursuit of our legitimate business interests. Under European and UK frameworks, we generally act as the Data Controller as we define the objectives and methods of processing. Please note that this notice does not extend to data we handle as a Data Processor on behalf of our corporate clients; in such instances, the client acts as the Data Controller, and we process data strictly according to their directions.

4. DISCLOSURE OF PERSONAL DATA.

We only share your data under specific circumstances or with designated professional partners. We may find it necessary to disclose or transfer your personal information as part of corporate transactions, including any merger, divestiture of company assets, organizational financing, or the acquisition of our business by another entity. Furthermore, data may be shared with

counterparties in shipbroking transactions (e.g., owners, charterers, or technical managers) when such disclosure is strictly necessary to execute a contract or comply with maritime regulations.

5. TRACKING TECHNOLOGIES AND EXTERNAL LINKS.

Our Services may utilize technical identifiers and logs to enhance site performance and security. While this Policy governs our internal data practices, our Services may contain links to third-party maritime databases, port authority websites, or other external platforms. We do not exercise control over, and assume no responsibility for, the content or privacy protocols of these third-party entities. We encourage users to review the individual privacy notices of any external site they visit through our platform.

6. INTERNATIONAL DATA TRANSFERS.

Your information may be moved, stored, and processed in jurisdictions other than your country of residence, including the United States. For residents of the European Economic Area (EEA), United Kingdom (UK), or Switzerland, we implement all required safeguards to ensure your personal data remains protected. Where data is transferred to jurisdictions not recognized as providing an adequate level of protection, we utilize Standard Contractual Clauses (SCCs) approved by the European Commission and the UK Information Commissioner. This framework ensures that your data receives a level of protection equivalent to that within the EEA and UK, regardless of the geographic location of our servers or third-party agents.

7. DATA RETENTION PROTOCOLS.

We maintain your personal data solely for the timeframe required to fulfil the objectives outlined in this notice, unless a more prolonged retention period is either required or permitted under applicable statutes, including tax, accounting, maritime regulatory mandates, or other legal obligations. When we no longer possess a valid, ongoing business justification to process your personal information, we will either delete the data or render it anonymous so it can no longer be associated with you. In specific instances where immediate deletion is technically unfeasible, such as data stored in secure backup archives, we will securely isolate the information to prevent further processing and ensure it remains protected until permanent deletion can be safely executed.

8. SECURITY OF INFORMATION.

The Company has established a robust framework of commercially reasonable physical, technical, and organizational security measures intended to safeguard the integrity and confidentiality of the personal data we handle. However, it is essential to acknowledge that no method of digital storage or electronic transmission is entirely infallible. Despite our dedicated efforts to implement appropriate safety protocols, we cannot provide an absolute guarantee that our security infrastructure will not be bypassed by unauthorized actors, such as cybercriminals, seeking to misappropriate or alter your information. Consequently, any transmission of personal data to or from our Services is conducted at your own risk, and we strongly recommend accessing our platform exclusively through secure and trusted network environments.

9. POLICIES CONCERNING MINORS.

We do not intentionally gather personal data from or direct our marketing efforts toward individuals under the age of 18. By accessing and utilizing our Services, you represent and warrant that you have reached the legal age of majority in your jurisdiction, or that you are the

legal parent or guardian of a minor using the platform and grant your explicit consent for their use. Should we discover that personal data has been inadvertently collected from a user under 18 years of age, we will take immediate steps to deactivate the associated account and implement rigorous measures to erase such records from our systems. If you have reason to believe we may possess data from a minor, please notify us immediately at the email address provided in this policy.

10. PRIVACY RIGHTS AND SUBJECT ENTITLEMENTS.

Depending on your geographic location, specifically within the European Economic Area (EEA), the United Kingdom (UK), or Switzerland, you are granted specific rights regarding the transparency and control of your personal data. These entitlements generally include the right to request access to and a copy of your personal information, the right to amend inaccurate data, and the right to request the complete removal of your information where technically feasible. Furthermore, you may have the right to limit our processing activities, object to specific uses of your data, or seek protection against decisions made solely through automated processing that produce legal effects. To exercise any of these rights, please contact us via the details provided in our contact section. We will evaluate and respond to all requests in strict alignment with applicable legal frameworks. If you reside in the EEA or the UK and believe our data processing activities infringe upon your rights, you possess the statutory right to lodge a complaint with your local Data Protection Authority. In instances where processing is based on your explicit consent, you maintain the right to withdraw such permission at any time; however, such withdrawal does not invalidate the legality of processing performed prior to the revocation, and we may continue to process data if a separate legal justification exists. Regarding the management of cookies, please consult your browser settings or our dedicated Cookie Policy for instructions on how to decline or delete tracking technologies.

11. POLICY ON DO-NOT-TRACK (DNT) SIGNALS.

Various web browsers and mobile operating systems offer a Do-Not-Track (DNT) setting that allows you to express a preference regarding the monitoring of your online activities. Currently, the digital industry has not reached a unified technical standard for how these signals should be interpreted or implemented. Consequently, our systems are not configured to respond to automated DNT signals or other mechanisms that communicate a request to opt out of online tracking. Should a mandatory industry standard be established in the future, we will update our internal procedures and reflect those changes in an amended version of this policy.

12. AMENDMENTS TO THIS PRIVACY NOTICE.

We reserve the right to modify this privacy notice periodically to remain in alignment with evolving legal requirements, international maritime regulations, and changing business practices. Any updates will be identified by a revised date at the top of the document, and the amended version shall become effective immediately upon its publication on our platform. In the event of significant or material changes to the methods by which we handle your personal data, we may provide a prominent alert on our website or transmit a direct notification to your registered contact address. We recommend that you consult this page regularly to stay informed of our current data protection protocols and ensure your continued agreement with our practices.

13. CONTACT INFORMATION.

If you have any inquiries, feedback, or concerns regarding this privacy notice or our data processing activities, please contact us via email at info@radshipbrokers.com or by mail at our

registered office located at *RAD Shipbrokers Ltd, ul. „Hristo Belchev“ 4, 1000, Sofia, Bulgaria*. For the purposes of the General Data Protection Regulation, RAD Shipbrokers Ltd serves as the Data Controller for your personal information.

14. REQUESTING DATA REVIEW, RECTIFICATION, OR ERASURE.

Depending on the jurisdiction in which you reside, you may be entitled to request access to the personal data we maintain, as well as the right to rectify inaccuracies or request the permanent deletion of your information from our systems. To initiate a formal request to review, modify, or remove your personal data, please submit your inquiry to *info@radshipbrokers.com*. We will evaluate, process, and respond to all such requests in strict accordance with the timelines and procedural requirements established by your local data protection laws, typically within thirty days of receipt. Please note that certain data may be exempt from erasure requests where retention is mandated by maritime law, tax obligations, or the necessity of defending legal claims.