



# GDPR & Electronic Correspondence

## 1. Privacy

This privacy policy applies to “ETHOS LTD” of the Marshall Islands. The Company takes privacy seriously into account and is committed to maintaining the highest level of protection when processing personal data; in compliance with the applicable national 4624/2019 and European (EU/2016/679) regulations. For transparency, please find hereunder some useful information on the Company’s data protection policy:

### Who we are

“ETHOS LTD” of the Marshall Islands, offers shipping and shipbroking services, currently trading under the name of “Anastopoulos Shipbrokers” and is registered to operate in the Hellenic Republic at the following address:

Anastopoulos Shipbrokers  
c/o Ethos Ltd  
4<sup>th</sup> floor  
Bouboulinas 10 & Notara 89-91 (entrance)  
City of Piraeus, PC 18535  
Telephone: +30 2104174480  
Electronic Mail: [snp@parisanastopoulos.com](mailto:snp@parisanastopoulos.com)

### What data do we collect?

- 3.1 Name and contact details such as phone numbers, email addresses and billing addresses.
- 3.2 Professional details, work history, educational background, marital status.
- 3.3 Financial information, bank details, insolvency records, payroll.
- 3.4 CCTV at our office may collect images of visitors, logs, and passes.

### How do we collect data?

The Company collects data directly via personal contact (i.e., business card v-cards), verbal communication, over the phone or digital correspondence, such as requesting marketing to be sent, attendance of meetings, visit our offices, providing feedback to the Company or during performing a professional service, such as through a contract agreement.

Indirectly, the Company obtains personal data on individuals from public sources, registers, news articles, social or professional networking websites, sanctions lists, business intelligence services and internet searches.

For the successful performance of the Company’s services, personal information may be requested from business clients.

### What do we do with that data?

The Company will use personal data only when there is a lawful basis for doing so. Some data may be processed for administrative purposes, others to register a new customer, or manage relationships with Clients and other parties and assist the Company performing its services. Personal data may be used to complete payment transactions or recover outstanding payments. They may also be processed to comply with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud, evasions of sanctions and other forms of financial crime.

### Failure to disclose data to the Company.

Failure or denial to provide personal data, needed to perform the Company's services or its legal obligations under the Hellenic, European and International regulations, it may prohibit the Company to provide the product or service, or obligation related to the physical person.

### Sharing Information

Personal Information may be shared with payment service providers, recruitment providers, and professional advisors, such as lawyers and insurers. They may also be shared with law enforcement, government organizations and regulatory agencies, or other third parties as required by applicable Hellenic and European regulations.

Transfer of personal data to third countries/international organizations outside the European Economic Area ("EEA") for the fulfilment of the aforementioned purposes, may only take place under the condition that the third country in question offers an adequate level of data protection, and the recipients of personal data comply therewith.

### Data retention

Personal data are stored and kept not longer than necessary for their purpose of use and always as per the applicable Hellenic and European regulations.

### Social media

This website contains social media icons. The Company cannot be held responsible for the information you provide to such websites and social media platforms.

## 2. Communications Disclaimer

### Disclaimer

Communication with Clients, co-Brokers, Third Parties, and other parties via electronic correspondence (e-mail), instant messaging, video conference, or any other modern means of communication, may contain, share through, or have attached information and/or files which are strictly confidential and intended solely for the use of the addressee.

If any physical person or legal entity is not the intended recipient and receives a message in error, such message and its attachments must be deleted from the computer system, email account or any mean of storage, and notify the sender immediately.

Even though ETHOS LTD has taken precautions to minimize the risk of transmitting any viruses, it is the recipient's responsibility to carry out all necessary virus checks. ETHOS LTD cannot accept liability for any loss or damage caused by software viruses or similar.

### Opting Out

If a recipient no longer wish to receive emails from the Company or simply does not wish to receive marketing communication, can request to opt-out via e-mail at: [snp@parisanastopoulos.com](mailto:snp@parisanastopoulos.com) or telephone call to our offices.

