

Monsoon Maritime Services Private Limited (“Monsoon”) respect individual privacy and is committed to protecting your information.

This Policy sets out important information relating to how we handle personal data in accordance with the Personal Data Protection Act 2012 Singapore and where applicable the European Union General Data Protection Regulation.

Any concerns, requests, or questions regarding the operation of this Policy, you can contact to our Data Protection Officer via email at operations@monsoonmaritime.com.sg or regular mail at:

Monsoon Maritime Services Private Limited
237 Alexandra Road #06-05
The Alexcier
Singapore 159929

WHY DO WE PROCESS YOUR PERSONAL DATA?

Monsoon provides crewing and crew management services to various principals.

In the process of providing these services, we collect, use, retain, update, transfer and disclose the personal data of employees, seafarers, agents, principals and users of our website.

For seafarers applying for employment or seafarers to be, have been or are currently employed on board vessels crew managed by us. We handle your personal data in order to/for:

- Assess and evaluate your suitability for employment or continued employment in any current or prospective positions on board our principal’s vessels.
- Verify your identify and accuracy of your personal details and other information provided.
- Verify authenticity of your declared competence and employment records and training certificates.
- Such purposes relating to your employment on board the vessels we crew-managed for (e.g. Relief planning, transportation, visas, working permit, flag state documents applications, payroll, training, appraisal, certification, sickness or injuries incidents while in employment, insurers, trade union payments, tax reporting, disciplinary and legal purposes etc)

- Conduct management analysis of our crew management services, risk management, improving our services which we use both internally and sometimes with our principal.
- Comply with laws, customs and regulations which may be applicable.
- Audit purposes by our principals or professional auditors.

The purposes listed in the above may continue to apply even in situations where your relationship with us (for example, pursuant to your employment contract should you be hired) has been terminated or altered in any way, for a reasonable period thereafter.

SOURCES OF PERSONAL DATA COLLECTION

For above mentioned purposes, we collect your personal data from you directly or from the following sources.

INFORMATION WE COLLECT DIRECTLY FROM YOU.

- When you send in job applications, curriculum vitae and any other documents or information provided by you through applying at our website, Facebook, WhatsApp, email, or other forms of direct contact with our staff.
- When you fill in our online survey forms (example onboarding form, feedback surveys, off-signing and any other purposes developed for our crew management purposes mentioned above.
- Information provided by you during interviews
- Information you provide when posting content on social media sites

INFORMATION WE COLLECT ABOUT YOU FROM THIRD PARTIES

- Third parties including from our agents or principals (curriculum vitae and other relevant documents including training and competence certificates, name, phone number, through emails)
- Relevant tax authorities may provide us information on you if we are assisting to report/pay your taxes in countries you worked in.
- Pension funds as applicable

INFORMATION WE COLLECT WHEN YOU USE OUR WEBSITE:

- Information you provide when you enter information on our website such as job applications, documents, answer online questionnaires or feedback forms.
- Information you provide when you subscribe to our mailing list.

- Information captured by our web logs.

TYPES OF PERSONAL DATA COLLECTED

- *Personal details* (surname, name, rank, nationality, marital status, date and place of birth)
- *Identification information/documents* (copies of passport, ID and national seaman book)
- *Contact details* (contact number, email, home address, social media IDs)
- *Passport size photo*
- *Next of kin details and family composition* (surname, name, relationship, email, telephone and home address, no. of dependents)
- *Medical Information* (copies of medical fitness, drug and alcohol test, vaccinations)
- *Certificates required for employment on board vessel* (Certificates of Competency, Flag State Documents, STCW and other training certificates required for position employed.)
- *Bank Data* (bank details of seafarer's nominated account for payroll and allotment purposes)
- Visas
- *Evaluation Reports* (information on seafarer's performance on board the vessel, either from an appraisal report or feedback collect from supervisors on board, principals or fellow crew member)
- *Wage and Payroll data* (Social insurance number, wages, payroll reports, tax declarations, allotments, deduction etc)
- *Injury and sickness reports* (Information of shipboard injuries and sickness of seafarers)
- *Service Record* (sign on and off dates/ports, vessel sailed with and wages earned)

Occasionally, we may need to collect some additional personal data from seafarers for the purposes mentioned earlier. In such case we shall provide you with information on the reasons why the additional data is required and how that data will be processed.

DISCLOSURE/TRANSFER OF PERSONAL DATA

In the course of conducting our business, we do transfer personal data of seafarers to third parties.

Categories of such third parties included, but are not limited to:

- Travel agents for booking of flights and arranging visas
- Hotels to book accommodation

- Transport companies for booking shore transport
- Port agents for taking care of immigration formalities and arranging transport/hotels as relevant to and from airport/vessel.
- Our Principals for evaluating suitability of employment, for compliance with regulatory requirements and/or operational purposes such as arranging work permits/visas, charterer's requirements.
- Flag state authorities or filing agents for application and issuance of necessary flag state documents.
- Governmental department for compliance to regulatory and/or tax obligations.
- Professional advisors (e.g. auditors and lawyers) appointed by us for handling tax compliance or any legal proceedings.
- Banks for payment of seafarers' wages.
- P&I Clubs for handling of injuries or sickness - evaluating eligibility to sick/injury benefits as per contract and collective bargaining agreements.
- Training centres for providing training course or checking authenticity of current certificates.

We take appropriate safeguards to protect the privacy of seafarers when transferring your personal data to third parties mentioned above. We ensure that only personal data that is necessary for the purpose for which it will be processed is transferred.

We may share your documents with our agents and principals on Microsoft OneDrive and access to such is password protected and limited to only those staff who need to know.

However, it may not always be practically possible for us to implement appropriate safeguards or to control the actions of such third parties. Therefore, the risk exists that personal data transferred might not be fully protected,

STORAGE OF PERSONAL DATA – HOW LONG WILL WE USE YOUR DATA?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data

and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

SECURITY OF PERSONAL DATA

We have implemented administrative, technical, and physical security measures to help prevent unauthorized access.

We make reasonable efforts to restrict access to information to only those employees, principals, and agents who need such access in order to conduct our business and purposes mentioned.

These measures / procedures are regularly reviewed and updated. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure but we strive to implement the necessary changes to ensure the continuous security of your personal information.

ACCESS TO AND CORRECTION OF PERSONAL DATA

If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided above.

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

Where we receive your request, we will respond without undue delay and in any event within 30 days of receipt of the request. This may be extended further in certain circumstances, e.g., where requests are complex or numerous.

Please note that depending on the request that is being made, we will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves. In those cases, it may be appropriate for us to simply provide you with confirmation of the personal data that our organisation has on record, if the record of your personal data forms a negligible part of the document.

RIGHT TO ERASURE

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

This right can be exercised free of charge and response will be made by us within one month.

RIGHT TO OBJECT TO PROCESSING OF YOUR PERSONAL INFORMATION

You may object to our use of your personal information for marketing purposes.

You may also object to processing of your personal information in cases where we have used legitimate interests as the basis for processing. In such cases, we will stop processing your personal information until we verify that we have compelling legitimate grounds for processing that outweigh your interests, rights, and freedoms in asking us to stop processing the data, or in limited cases where we need to continue processing the data for the establishment, exercise, or defence of legal claims.

RIGHT TO DATA PORTABILITY

In most cases, you have the right to receive all personal information you have provided to us in a structure commonly used and machine-readable format and to transmit this data to another organisation, where technically feasible.

RETENTION OF YOUR PERSONAL DATA

We may retain your personal data for as long as it is necessary to fulfil the purposes for which they were collected, or as required or permitted by applicable laws.

We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected and are no longer necessary for legal or business purposes.

EFFECT OF POLICY AND CHANGES TO POLICY

We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. You can email our Data Protection Officer if you need an updated copy.

Your continued employment and participation in our recruitment process constitute your acknowledgement and acceptance of such changes.

Effective date : 30 December 2020

Last updated :



Singapore, 30 December 2020

Mr. Pan Boon Pin
Managing Director
Monsoon Maritime Services Pte Ltd