

## PRIVACY & COOKIES POLICY

Blue Ocean Maritime Income plc ("we", "our" or the "Company") and our manager, EnTrustPermal Ltd. ("ETP") is committed to protecting the privacy of third parties, including its clients and all visitors to the website [www.blueoceanplc.com](http://www.blueoceanplc.com) (the "Website"). Please read the following Privacy and Cookies Policy which explains how we use and protect your information.

We will only use information from which you can be identified ("**Personal Information**") provided to us, or otherwise obtained by us, as set out in this Policy. We endeavour to ensure that your Personal Information is handled in accordance with "**Data Protection Legislation**". References to "**Data Protection Legislation**" in this Policy mean any law applicable from time to time relating to the processing of personal data and/or privacy, as in force at the date of this Agreement or as re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation, the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, in each case including any legally binding regulations, direction and orders issued from time to time under or in connection with any such law.

By visiting and/or contacting us through the Website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. The Company reserves the right to change this Policy from time to time and you should therefore check this page each time you access it to ensure that you are happy with any changes.

In this Policy, the "Company", "we", "us" and "our", refer to the Company, registered in England & Wales with its registered office at Springfield Lodge, Colchester Road, Chelmsford, Essex CM2 5PW. Our company registration number is 11512114.

For the purposes of Data Protection Legislation, we are deemed to be the "data controller" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

This Privacy and Cookies Policy covers:

1. Personal Information that we collect from you via this Website
2. Personal Information that we receive from other sources
3. What we do with your Personal Information
4. How we share such Personal Information
5. Our security and data retention measures, and any transfers we make outside of the EEA
6. Accessing and updating your Personal Information
7. Complaints
8. Use of cookies
9. Changes to this Policy
10. Our contact information

### 1. **PERSONAL INFORMATION THAT WE COLLECT FROM YOU VIA THIS WEBSITE**

When you engage with us (e.g. by visiting or making an enquiry through the Website), you may provide Personal Information about yourself including your name and contact details (e.g. your address, email address and telephone number). Where you make use of our Website we may also collect information about your use of the Website (e.g. your IP address and choice of web browser).

Some of this Personal Information is collected and processed so we can answer your enquiry, some for the purpose of legal compliance and some for the purposes of our legitimate

business interests (namely to carry out and improve our business, analyse the use of our Website and services and support visitors to the Website).

## **2. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHER SOURCES**

We may receive information from third parties who collect Personal Information from you and pass it on to us. Where this is the case that the third party is responsible for obtaining the relevant consents from you to ensure you are happy with the ways in which your Personal Information will be used.

## **3. WHAT WE DO WITH YOUR PERSONAL INFORMATION**

We will only use your Personal Information in order to (a) supply the investment services or information you have requested and correspond with you, (b) provide support to you in respect of these services, (c) improve our Website and services, and (d) for our internal business processes.

Where you have explicitly consented at the time we collected your Personal Information or where we otherwise have a right to do so, we may also use your Personal Information to let you know about our products and services, by post, telephone and e-mail.

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us at [enquiries@blueoceanplc.com](mailto:enquiries@blueoceanplc.com) or Blue Ocean Maritime Income plc, C/O EnTrustPermal Ltd., 12 St. James's Square, London SW1Y 4LB.

## **4. HOW WE SHARE YOUR PERSONAL INFORMATION**

Where it is necessary to answer your enquiry or for our internal business processes, we may share your Personal Information with certain third parties such as our administrator(s). By submitting your Personal Information to us, you agree to such third parties processing your information. The Company requires all third parties to treat your data securely and in accordance with this Privacy Policy and will take reasonable steps to enforce this.

In addition, it may be necessary to disclose your Personal Information if we have a duty to in order to comply with any legal obligation (such as AML obligations), or protect the rights, property, or safety of the Company, the Company's group companies and our contractors, clients, directors, employees or other personnel. This includes, without limitation, exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

## **5. OUR SECURITY AND DATA RETENTION MEASURES, AND ANY TRANSFERS WE MAKE OUTSIDE OF THE EEA**

The Personal Information you provide to us will be transferred to and stored on our servers in the United Kingdom (London) and we take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as Data Protection Legislation allows.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk.

In processing your Personal Information, it may be necessary for us to transfer your Personal Information outside the European Economic Area ("EEA"). It may also be accessed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the provision of support services to the Company or the Website. We will take all steps reasonably necessary to ensure that your Personal Information

is treated securely and in accordance with this Policy and Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the EEA. This means that we will only transfer your Personal Information to third parties outside the EEA if that third party (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to Personal Information, or (b) has agreed (by way of written contract) to provide all protections to your Personal Information as required by Data Protection Legislation. For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and/or the UK.

## **6. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION**

You have the right to ask us not to process your Personal Information for marketing or research purposes. We will usually inform you (before collecting your Personal Information) if we intend to use your Personal Information for such purposes or if we intend to disclose your Personal Information to any third party for such purposes. You can also exercise the right at any time by contacting us at the details set out at section 10 below.

You have the right to see the Personal Information we hold about you and to ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) transfer any information we hold about you to a specified third party. If you wish to do this, please contact us using the contact details set out at section 10 below.

## **7. COMPLAINTS**

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us using the details set out at section 10 below. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

## **8. USE OF COOKIES**

Please note that third party providers may use cookies to assess the ways in which you make use of their websites and we have no control over these.

## **9. CHANGES TO OUR PRIVACY AND COOKIES POLICY**

The Company may amend this Policy at any time without notice. By continuing to use the Website and making use of our services you agree to the updated Policy. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) the Website and/or our services. Any changes to this Policy will be posted on the Website.

## **10. OUR CONTACT INFORMATION**

If you have any questions (including relating to transfers of your Personal Information outside the EEA), please feel free to contact us by email at: [enquiries@blueoceanplc.com](mailto:enquiries@blueoceanplc.com)