

Polaris Holding Company Limited

Privacy Notice

(28 Aug 2024)

Who Are We

Polaris Holding Company Limited (Polaris) and its subsidiary companies, Stevedoring Services Limited, East End Asphalt Company Limited, Duck's Puddle Properties Limited, Equipment Sales and Rentals Limited, (collectively known as Polaris) are committed to being responsible custodians of any information you may provide. Any information collected will be used solely for the purpose for which it was collected regarding Polaris's business operations. Please review this document carefully and contact us if you have any questions. By accessing and using our website and/or providing your Personal Information you are deemed to have read this Privacy Notice, understood its contents, and agree to the terms and conditions therein.

Polaris has its registered office at:

Stevedore House
38 Front Street
Hamilton HM12
Bermuda
Tel: 441-292-3366
E-mail: privacy@ssl.bm

For any general query, please contact us at this address.

Our Privacy Officer

Mr. Randy Rochester
Stevedore House
38 Front Street
Hamilton HM12
Tel: 441-292-3366
E-mail: privacy@ssl.bm

For any query relating to privacy compliance, please contact our Privacy Officer.

PIPA

Applies to 'personal data', which is information which relates to individuals. It gives individuals the right to access their own personal data through subject access requests and contains rules which must be followed when personal data is processed.

Personal Information

For the purposes of this Privacy Notice, personal information means any information about an identified or identifiable individual and can include such information that can allow someone to identify you either directly through your name or indirectly through your address, phone number or date of birth. The Personal Information Protection Act 2016 (PIPA), which takes effect on January 1, 2025, provides individuals in Bermuda with protection of their rights with regards to the relaying their Personal Information.

Collection of Data

This Privacy Policy sets out how Polaris may collect, use and share information and describes:

1. The types of information, including personal information, we may collect and use.
2. How we may use and share the information collected.
3. The measures in place to protect and safely store the information collected.
4. Retention of the information collected.
5. Your rights in respect of the information we may use.
6. How you may contact us; and,
7. Process for complaints.

Types of Data Collected

In accordance with the Personal Information and Protection Act 2016, the following information may be collected from individuals wishing to do business with the Company.

1. Name
2. Address
3. Telephone number
4. Email

Description of Personal Data Retained

The following are the types of information about you which the Company may hold or process (although the list is not exhaustive)

1. Financial or other information i.e. bank account details and Social Insurance number.
2. Personal details including physical and mental health record, disabilities, infirmities, racial or ethnic origin.
3. Current marriage or partnership, marital history, details of other family, household or next of kin.
4. Immigration status
5. Academic record, qualifications and skills, membership or committees and professional bodies
6. Employment record including career history, references, recruitment details, current employment, work record, training record, health and safety record, grievance, disciplinary, incident or accident details, holiday and sickness records, termination details
7. Financial details including income, payments and deductions.
8. Performance and appraisal records

9. Security details/Criminal record checks
10. Pension enrollment, changes and termination details
11. Employment letters/contracts
12. Any other personal data necessary for the conduct of the employment or other contractual relationship between the Company and the data subjects.

Access to Personal Information

Employees wishing to have access to their personal data may follow the process prescribed in Appendix I to this document.

Confidentiality

Polaris is committed to protecting the confidentiality and privacy of information collected. As a part of its primary responsibility, Polaris will implement the appropriate protections and use of personal data collected in any format. It is the intent of Polaris to only collect personal information that is necessary and provided freely. We reserve the right to use this information for employment opportunities when they arise from time to time.

Where does your personal information come from

Personal information can include anything that can allow someone to identify you either directly, through your name, driving license, or passport number (etc.), or indirectly, through your address, phone number, date of birth or IP address as examples.

What information do we collect

We obtain personal information about you if you choose to provide it such as contact mailboxes or registering for certain services with the Company. In some cases, you will have previously provided your personal information to Polaris. For example, being a former employee, applying previously for employment, or an application for a dock pass.

IP addresses

An Internet Protocol (IP) address is the unique identifying number assigned to every device such as a personal computer, laptop or handheld device connected to the internet. An IP address definition is a numeric label assigned to devices that use the internet to communicate. Whenever you access the internet, it allows computers and servers to recognize and communicate with one another. IP addresses from which visitors appear to originate will be recorded for IT security and system diagnostic purposes. This information will also typically be used in aggregate form to conduct website trend and performance analysis.

Cookies

Cookies are small files of information that a web server generates and sends to a web browser. Web browsers store the cookies they receive for a predetermined period. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Your consent applies to the following domains: www.polaris.bm.

How we use your personal information

Information submitted to Polaris will only be used for the purposes for which it is collected and, in the manner outlined in this privacy statement. Your personal information is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law or professional standards. For example, when are legally entitled to do so by government agencies such as the Bermuda Police Services, the Courts or the Department of Immigration and insurance providers.

Who has access to your personal information?

The following individuals and/or types have access to your personal information:

1. Human Resources Manager
2. Finance Department Comptroller
3. Vice President of Finance
4. Any person required by law. We disclose only the personal information that is necessary to comply with a lawful request.
5. Company Auditor requests
6. IT Support

Where is your personal information stored?

1. Hard copy forms are kept in secure offices in Hamilton
2. Electronic data created after inputting the data from the hard copy forms is maintained in cloud servers based in Office365 SharePoint.

Changes to Personal Data

1. Employees are responsible for providing accurate information and updating the information when changes occur.
2. You must notify Stevedoring Services Limited of **any** changes to your details as soon as possible, in writing, to Human Resources.
3. Notification of changes to personal data should be forwarded to hrpolaris@ssl.bm.
4. The Company will inform you of any changes to the description of personal data or the purposes for which personal data is held or used.

Retention of your personal information

We will make reasonable efforts to retain personal information only for as long the information is necessary to comply with an individual's request, necessary to comply with contractual agreements, internal business or policy requirements, or until such time as the individual requests that their information be deleted. The period for which data is retained will depend on the specific nature and circumstances under which the information was collected. However, we will make our best efforts not to retain personal information for longer than required by law. We will take the necessary steps to destroy the personal information once it is no longer in use for the purpose it was collected unless it is necessary to retain the information for legal or business purposes.

What are your rights?

We will do all we reasonably can to assist you with any issue arising from our use of your personal information. Should you have any questions, please contact our Privacy Officer.

Data security and integrity

Reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Notwithstanding our best efforts, there is no guarantee against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. The required internal protocols have been established to mitigate risk.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to expedite any response.

Use of Personal Information

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason. Some examples could be for:

1. Billing and collecting payment purposes
2. Advising of updates to business hours of operations
3. Responding to any queries
4. Providing any relevant reports
5. Resolving any queries
6. To maintain contact register

Should you have any concerns, please contact the Privacy Officer at the contact details provided above.

Sharing of Data

As the parent company, Polaris may provide certain services to its subsidiaries that include, but may not be limited to:

1. Human Resources
2. IT
3. Finance Department
4. Communications team
5. Trade Union

The provision of the above services may require the transfer of Personal Information between the Polaris Group. If you have any questions about this privacy notice or about our use of your Personal Information please contact our privacy officer, Ms. Randy Rochester, using the contact details provided.

Disclosure of your personal data

We will not disclose your personal data without your knowledge or consent unless required to do so by law.

Consent

We will only use your personal information as prescribed in this Privacy Notice subject to your consent. Should you wish to withdraw your consent to such use, you may contact the Privacy Officer at the details provided in this Notice.

Complaints Process

You have the right to make a complaint about how we manage your personal data to your respective supervisory authority. However, we would appreciate the opportunity to address any concerns before advancing to the local regulator (Privacy Commission). **Attached at Appendix II is the internal complaints process.**

Privacy Notice Revisions

This Privacy Notice may be updated from time to time and shall replace any previous Notices that were published.

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