

PRIVACY POLICY

This Data Protection Policy (referred to as the “**Privacy Policy**”) describes how MSC Shared Service Center Belgium NV, registered in Noorderlaan 127a, 2030 Antwerpen, Belgium (together referred to as “**MSC SSC Belgium**”), acting each in our capacity of data controller¹, collect, use, and store (referred to as the “Processing” or “Process”) any type of data relating directly or indirectly to a living individual (referred to as the “**Personal Data**”).

In the context of “Medlog TPS” that data subjects will only be:

- Truck driver providing container transport services for MSC (referred to as the “Data Subject”);
(Only validated user will be allowed to use “Medlog TPS”)

The Policy is drafted in strict compliance with the **European Regulation (EU) 2016/679** (referred to as “General Data Protection Regulation”) on the protection of the Data Subjects, and any other applicable laws and regulations in relation to the protection of Personal Data.

MSC SSC Belgium is committed to protect your rights under the Belgian **Data Protection Act of 30 July 2018**, as amended from time to time, and any other applicable laws applicable to the Processing of your Personal Data as described in this Privacy Policy (referred to as “**Applicable Data Protection Laws**”).

If you have any questions relating to this Notice or the Processing of your Personal Data, please reach out at peter.loriers@msc.com

¹ **MSC SSC Belgium** determines the purposes and means of the processing of personal data to attend and protect the truck drivers (referred as Data Subjects).

DATA PROTECTION NOTICE

Data Controller	MSC Shared Service Center Belgium NV	+ More Info
Purpose	Obtain the location and route information in the form of GPS signals and other information sent by your mobile device to create a detailed location history of all of the journeys you have made and detect delays, stops and to reroute and track the container while the Application is opened.	+ More Info
Data Source	Directly from the truck driver (Data Subject).	+ More Info
Parties who access / Use Data	<ul style="list-style-type: none"> ▪ Necessary service providers for the normal operation of the App ▪ Public authorities / Government bodies (e.g. Courts) if a proceeding is initiated 	+ More Info
Data retention	Personal Data are not kept for periods longer than necessary to fulfil the Purposes for which they have been collected.	+ More Info
Legal Basis	<ul style="list-style-type: none"> ▪ The Processing of your Personal Data is based on your express consent of the Data Subject 	+ More Info
Data Category	<p>Personal Data Processed will be limited to those:</p> <ul style="list-style-type: none"> ▪ ID Account ▪ Geolocation data (Physical location or movements) <p>In any case, only Personal Data strictly necessary to track the container transportation performance.</p>	+ More Info
Security	MSC SSC Belgium maintains appropriate technical and organisational measures to ensure a high level of confidentiality and we continually adapt these measures to ongoing technological developments. Moreover, the data you provide us will be stored in a specially secured database.	+ More Info
Cross-border data transfer	<p>No Personal Data will be transferred to third countries. outside of:</p> <ul style="list-style-type: none"> ▪ The European Economic Area (EEA); and ▪ Switzerland. <p>When transferred, MSC SSC Belgium ensures that your Personal Data will be processed with the same level of security and confidentiality by the recipients as if it were in the aforementioned jurisdictions.</p>	+ More Info

<p>Rights of the Data Subjects</p>	<p>In accordance with Applicable Data Protection Laws, the geolocated Data Subjects have the right to:</p> <ol style="list-style-type: none"> 1. Demand access to their Personal Data (commonly known as a “data subject access request”). 2. Demand the correction of their Personal Data in the case they are incorrect or out of date. 3. Demand erasure of their Personal Data (commonly known as the “right to be forgotten”). 4. Object to the processing of their Personal Data where MSC SSC Belgium is relying on its legitimate interest (or those of a third party). 5. Demand the restriction of the processing of their Personal Data. This enables the person to ask MSC SSC Belgium to suspend the processing of their Personal Data for a limited period of time. 6. Request the transfer of their Personal Data to another party in a common readable format where it is practicable (commonly known as the “data portability”). <p>In accordance with Applicable Data Protection Laws, you are also entitled to lodge a complaint with the competent supervisory authority.</p>	<p>+ More Info</p>
<p>Contact</p>	<p>Should you have any inquiries about the processing of personal data, please contact at peter.loriers@msc.com</p>	
<p>Exercise of your rights</p>	<p>The aforementioned rights can be exercised by completing the form available here which can also be found on msc.com.</p> <p>MSC SSC Belgium may need to request additional Personal Data about you in order to verify the identity of the person exercising their rights and/or assess the validity of their request. This is a security measure to ensure that the requested Personal Data is not disclosed to a person who has no right to receive them.</p>	

1. WHAT PERSONAL DATA IS COLLECTED ABOUT YOU?

MSC SSC Belgium may Process the following Personal Data:

- ID Account
- Location through GPS system (route information and/or search query history to provide navigation service)

*In any case no Sensitive Personal Data will be processed.

2. WHY AND ON WHAT BASIS YOUR DATA WILL BE USED?

MSC SSC Belgium is responsible for deciding how it will Process the Personal Data, for which purposes (referred to as “Purposes”), and on which legal basis.

MSC SSC Belgium will use these data as required to obtain the location and route information in the form of GPS signals and other information sent by your mobile device to create a detailed location history of all of the journeys you have made and detect delays, stops and to reroute and track the container while the Application is opened;

MSC SSC Belgium shall use its best endeavour to process only strictly needed Personal Data in order to meet the aforementioned purpose. Any unnecessary data will be promptly deleted from [Name of the App] or any other system.

** **MSC SSC Belgium** is committed to process personal data in a proportionate, minimum, and transparent manner.*

UPON YOUR PRIOR EXPRESS CONSENT

MSC SSC Belgium rely on your express consent when Processing your Personal Data for the following Purpose:

- Geolocation tracking requires the GPS signals embedded in mobile devices to show precisely where the device is located, and the user of the device. This data is accessed by voluntarily installing "Medlog TPS" on the truckers device, accepting the access permissions, and by expressly consenting to this Privacy Policy.

3. HOW ARE YOUR DATA COLLECTED?

MCS SSC Belgium collects Personal Data directly from the Data Subject mobile device.

4. HOW MSC WILL USE PERSONAL DATA ABOUT YOU?

MSC SSC Belgium will only Process your Personal Data in strict compliance with the Applicable Data Protection Laws, in a proportionate manner and for the time strictly necessary to meet the Purposes.

Only authorized personnel under a strict duty of confidentiality will Process your location personal data through Medlog TPS. Such personnel will manage the location history during the transportation service.

5. HOW LONG DO MSC KEEP YOUR PERSONAL DATA FOR?

The Personal Data contained in our servers will be Processed for:

- The time strictly necessary to fulfil the aforementioned Purposes;
- The period which corresponds to any legal term applicable; and
- Where applicable, the time necessary for MSC to attend legal Data Subject requests (e.g. Data access). The Personal Data are deleted once all statute of limitation periods have expired.

If you would like further information on the period for which your Personal Data will be kept or the criterions used to determine that period, please write your request at the following email address: peter.loriers@msc.com

6. WHO DO MSC SHARE YOUR PERSONAL DATA WITH?

MSC ensures that the identity of the Personal Data is not disclosed to anyone beyond the authorized competent staff members who are under a strict confidentiality duty.

If is strictly necessary Personal Data can also be revealed to Police and/or Courts, local competent public authorities;

7. WILL YOUR PERSONAL DATA BE TRANSFERRED OVERSEAS?

MSC SSC Belgium will not transfer your Personal Data outside the EU/EEA or Switzerland, except where such transfer is required due to MSC's legal obligation to disclose your Personal Data to local authorities and courts;

8. SECURITY MEASURES

MSC SSC Belgium will implement appropriate technical and organizational security measures to protect the Data Subjects Personal Data against any accidental or illegal destruction, accidental loss, alteration, unauthorized disclosure or unauthorized access, and against any illegal means of Processing.

Connection is protected with **Hypertext Transfer Protocol Secure (HTTPS)**, and authentication control access to our database are secured with **Tokens**.

9. WHAT ARE YOUR RIGHTS IN CONNECTION WITH YOUR DATA?

The Data Subject has the right to:

1. Obtain from MSC confirmation as to whether Personal Data concerning his or her is being processed, and, where that is the case, access to the Personal Data;
2. Request from MSC rectification of their Personal Data;
3. Request from MSC restriction of the Processing of their Personal Data;
4. Request from MSC erasure of their Personal Data;
5. Object to the Processing of their Personal Data; and
6. Request the transfer of their Personal Data to another party in a common readable format where it is practicable (commonly known as the “data portability”).

“Medlog TPS” is not designed or intended to be downloaded by underage. Our App does not collect Personal Information from any person we actually know is underage.

For more information on how to manage your Android device location setting, please check the following link:

Android: [Link](#)

Apple: [Link](#)

If you wish to inquire as to whether we maintain any Personal Information about you, and you wish to exercise any of the rights that are available to you with respect to such Personal Information, please contact us. In all cases we shall endeavor to respond to your request within 30 days. If we require more time in order to process your request, we shall inform you.

To allow us to verify your request, please include the following information: name, address, phone number, email address and a piece of identification.

In accordance with the Applicable Data Protection Laws, in addition to the rights aforementioned, you are entitled to lodge a complaint with your local data protection supervisory authority.

Belgium: [Belgian Data Protection Authority \(GBA\)](#)

10. HOW YOU MAY EXERCISE YOUR RIGHTS?

The aforementioned rights can be exercised by completing the form available [here](#) which can also be found on [msc.com](#).

MSC SSC Belgium may need to request additional Personal Data about in order to verify the identity of the person exercising their rights and/or assess the validity of their request. This is a security measure to ensure that the requested Personal Data is not disclosed to a person who has no right to receive them. If you have any questions about this Notice, you may address your request to: peter.loriers@msc.com