



2.5 Privacy and Personal Data Protection Policy

1 Purpose

The purpose of this policy is to ensure that personal data is processed in a lawful, fair and transparent manner, and to protect the privacy and data protection rights of individuals as a fundamental human right, in accordance with the EU General Data Protection Regulation (GDPR) and other applicable data protection legislation.

2 Scope

This policy applies to all employees, crew, contractors and others who process personal data on behalf of the company. The policy covers all processing of personal data carried out in the context of employment, recruitment, operations, administration, and the use of information and monitoring systems.

3 Statement, principles & commitments

Olympic commits to the following principles:

Lawfulness, fairness and transparency

- Personal data shall be processed lawfully, fairly and transparently, and only for specified and legitimate purposes based on a valid legal basis.

Data minimisation and purpose limitation

- Only personal data that is relevant and necessary for the stated purpose shall be collected, accessed, used or shared.

Accuracy

- Personal data shall be kept accurate and, where necessary, up to date.

Storage limitation

- Personal data shall not be stored longer than necessary and shall be deleted or anonymised in accordance with legal requirements and internal retention rules.

Integrity and confidentiality

- Appropriate technical and organisational measures shall be implemented to protect personal data against unauthorised access, loss, alteration or disclosure, based on risk.

Risk-based approach

- Certain types of personal data and processing activities may involve increased privacy risk. This includes, but is not limited to, the processing of identity data, employment and recruitment data, health related data, and the use of monitoring, access logging, surveillance, photographs, audio or video recordings.
- Where relevant, such processing may be subject to enhanced safeguards, access controls, documentation and oversight.

Third-party processing and international transfers

- Personal data shared with suppliers or service providers shall be protected through appropriate safeguards. Transfers outside the EEA shall only take place where lawful safeguards are in place.

Accountability

- The company maintains documentation of personal data processing activities, risk assessments, and safeguards to demonstrate compliance with GDPR.

Expected behaviour

Anyone who handles personal data on behalf of the company shall:

- process personal data only when necessary for a legitimate work-related purpose
- handle personal data with care and confidentiality
- use approved systems and follow established routines
- report suspected data breaches or misuse immediately in accordance with internal routines

Rights of individuals

- The company respects the rights of individuals under GDPR, including the right of access, rectification, erasure, restriction of processing, and, where applicable, data portability.

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