



CHINA NAVIGATION



CCPA Data Protection & Privacy Policy

Document Number: RIS-GLB-POL-0007
Revision: 2
Date: 20-07-2021
Policy owner: Risk and Insurance Manager

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Revision Number	2	
Date	20-07-2021	
Classification	PUBLIC	Page 1 of 6
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1. Purpose

The CNCo Group CCPA Data Protection & Privacy Policy must be read in conjunction with the [CNCo Group Data Protection & Privacy Policy](#) as it contains an additional explanation of why and how we process the personal data of California residents, their rights in relation to personal data, and how to contact us.

2. Policy Statement

The China Navigation Company Pte Ltd and its subsidiaries ("**CNCo Group**", "**we**", or "**us**") value the privacy of the personal data we collect from our business customers, suppliers and partners (and each of their employees, officers, agents, contractors or any other individuals they engage with) ("**you**", or "**your**") and are committed to protecting the privacy and security of your personal data in accordance with Data Protection Legislation.

Effective January 2020, the California Consumer Privacy Act ("CCPA") grants consumers (California residents) certain rights with respect to their personal information. CNCo respects the privacy rights of consumers and endeavours to make consumers aware of and comply fully with the rights afforded to consumers by the CCPA.

3. Application

This policy applies to personal data collected by The China Navigation Company Pte Ltd and its subsidiaries from our business customers, suppliers and partners (and each of their employees, officers, agents, contractors or any other individuals they engage with).

4. Definitions

CNCo Group The China Navigation Company Pte Ltd and its subsidiaries

5. Policy Details

5.1 The Right to Know

This Privacy Policy sets forth CNCo's current and past (within past 12 months) practices related to the general categories of personal information we collect, how we collect it, how we use the personal information we collect, and how, if at all, and with whom we share the personal information. In addition to what is described in this Privacy Policy, consumers have the right to request that CNCo disclose to the consumer the following information:

- The categories of personal information CNCo has collected about the consumer.
- The categories of sources from which CNCo the personal information.

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- The business or commercial purpose for collecting or selling (to the extent applicable) the personal information.
- The categories of third parties with whom CNCo shares personal information.
- The specific pieces of personal information CNCo collects about the consumer.

CNCo will provide this information to a consumer upon receipt and verification of a Verifiable [CCPA California Consumer Request Form](#) (hereinafter a "Request to Know"). This form is also available on the CNCo website.

For details on how to submit a Request to Know, see section 5.5. Any information provided by CNCo in response to a Request to Know will cover the 12 months preceding the date of the request.

5.2 The Right to Request

The Right to Request that CNCo and its service provider delete your personal information

A consumer has the right to request that CNCo delete any personal information about the consumer which CNCo has collected from the consumer and direct any service providers acting on its behalf to do the same. CNCo will comply with a consumer's request to delete his or her personal information upon receipt and verification of a Verifiable [CCPA California Consumer Request Form](#) (hereinafter "Request to Delete"). This form is also available on the CNCo website.

The CCPA may entitle CNCo to retain certain personal information collected from a consumer, notwithstanding the consumer's request to delete the same. For example, notwithstanding a consumer's request to delete, CNCo is entitled to retain the following information:

- Personal information necessary to complete a contract between the consumer and CNCo.
- Personal information necessary to detect security incidents.
- Personal information necessary to identify and repair errors in Company provided products or services.
- Personal information necessary to exercise any right provided for by law.
- Personal information necessary to engage in research with information provided by a consumer with informed consent.

Additional bases that would entitle CNCo to retain a consumer's personal information, notwithstanding the consumer's Verifiable Consumer Request to Delete the same, are set forth in California Civil Code §1798.105(d).

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5.3 The Right to Opt-Out

The Right to Opt-Out of the sale of your personal information

Under California law, a consumer has the right to opt out of the sale of his/her personal information by a business that collects personal information and sells it ("Request to Opt-Out"). However, CNCo does not sell any personal information it collects from consumers. Because CNCo does not sell consumers' personal information, a consumer does not need to submit any Request to Opt-Out.

5.4 The Right to Non-Discrimination

The Right to Non-Discrimination for the exercise of your rights under the CCPA

A consumer has the right to be free from discrimination by CNCo because the consumer exercised any of his/her rights under the CCPA. Examples of discrimination may include:

- Denying goods or services to you.
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties, in a manner that is not justified under the law.
- Providing a different level or quality of goods or services.

CNCo will not discriminate against consumers who exercise their rights under the CCPA.

5.5 Exercising your rights under the CCPA

Consumers may submit a request to exercise their rights under the CCPA by either of the following methods:

- Completing the [CCPA California Consumer Request Form](#) and submitting it to dataprotection@swirecnco.com. This form is also available on the CNCo website.
- Call CNCo at toll-free number 1 (866) 384-9813 and provide all the information required by the [CCPA California Consumer Request Form](#)

A consumer is entitled to utilize an authorized agent to exercise his/her rights under the CCPA. If the consumer chooses to utilize an authorized agent for this purpose and that agent is not acting pursuant to a power of attorney, CNCo reserves the right to require:

- That the authorized agent directly verifies his or her identity with the business.
- That the consumer otherwise directly confirms to CNCo that he/she has provided the authorized agent permission to submit the request.

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Any authorized agent submitting a Request to Know on behalf of a consumer should complete and submit a completed [CCPA California Authorized Agent Designation Form](#) to dataprotection@swirecnco.com along with his/her request on behalf of the consumer or provide all the information required by the CCPA California Authorized Agent Designation Form to CNCo when submitting a consumer request via email or toll-free telephone.

6. Governance

6.1 Policy Owner

The policy owner is stated at the beginning of this policy. If the policy owner changes, the policy must be re-issued to document this.

6.2 Changes to Policy

CNCo reserves the right to amend this policy at its sole discretion. In case of amendments, the policy owner will inform staff appropriately and the policy will be re-published on the CGS and CNCo website

7. Related Documents

Level2	Level3a	Level3b	Level4
<ul style="list-style-type: none"> Data Protection & Privacy Policy 			<ul style="list-style-type: none"> CCPA California Consumer Request Form CCPA California Authorized Agent Designation Form

8. Policy History

Amendment Date	Section	Revision Number	Description
02-08-2021		2	

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