

Subject:	ARIVA LTEE DATA PROTECTION PRIVACY POLICY (EXTERNAL USE)				
	Controlled by:	Approved by:	Policy No.:	Revision No.:	Revision Date:
	<i>DPA Team</i>	<i>Management</i>	<i>007</i>	<i>1.0</i>	<i>March 2021</i>



ARIVA LTÉE
Data Protection Privacy Policy

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1.0 POLICY STATEMENT

This Data Protection Privacy Policy (“Policy”) is a corporate guideline for the data protection standards applicable within the Ariva Ltée & Ariva Maritime Ltd and is designed to satisfy legal data protection requirements. All companies within the Ariva Ltée & Ariva Maritime Ltd are bound by these regulations as regards the use, handling and processing of personal data belonging to customers, employees, shareholders and suppliers (including cargo agents, airlines etc.). As such, it provides appropriate safeguards for transmission of personal data belonging to customers and employees to Ariva Overseas companies and cargo agents, and ensures compliance with the Data Protection Act 2017 of Mauritius.

The Group has developed policies, procedures, controls and measures to ensure maximum and continued compliance with the data protection laws and principles, including staff training, procedure documents, audit measures and assessments. Ensuring and maintaining the security and confidentiality of personal data is one of our top priorities.

2.0 APPLICATION

This Policy applies to any processing of your personal data by us, whether such information is provided to us through our website, by email, through the filling of forms (including employment-related ones), through the exchange of contractual documents, by letter or verbally, or through any other physical or electronic means.

By entering into a business relationship with us, or by providing your personal data to us, you confirm that you are agreeable to the processing of your personal data in accordance with the terms of this Policy.

3.0 WHO ARE WE AND HOW WE MAY BE CONTACTED?

Ariva Ltée & Ariva Maritime Ltd means Ariva Ltée and any company related to, or a subsidiary of, Ariva Ltée. “Related” shall be construed in accordance with the Companies Act 2001 while “subsidiary” shall mean those companies disclosed as subsidiary in the audited financial statements of Ariva Ltée.

We have appointed a Data Protection Officer to oversee the Group’s data protection strategy and its implementation to ensure compliance with relevant Data Protection Laws. You may contact him if you have any query regarding this Policy or any other matter relating to your personal data (see Annex 1).

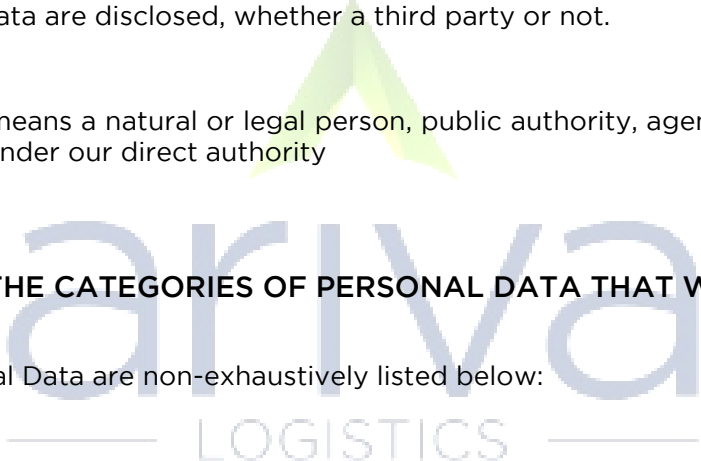
4.0 DEFINITIONS

We have tried to use simple and plain English as far as possible in this Policy. However, data protection is a complex subject and the use of technical terms from time to time is inevitable. We have therefore set out below definitions of the technical terms we have used in this document:

- **“Personal Data”** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes information such as your real name, address, telephone number and date of birth. Information which cannot be linked to your real identity - such as favorite websites or number of users of a site - is not considered personal data.

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- **“Consent”** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **“Data controller”** means, the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **“Data processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Data subject”** means an individual who is the subject of personal data.
- **“Processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Recipient”** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.
- **“Third Party”** means a natural or legal person, public authority, agency or body other than the data subject, under our direct authority



5.0 WHAT ARE THE CATEGORIES OF PERSONAL DATA THAT WE MAY COLLECT?

The categories of Personal Data are non-exhaustively listed below:

CATEGORY OF DATA	EXAMPLE
IDENTITY	First name, maiden name, last name, date of birth, marital status, gender, job title, NID number, Passport number, signature, username or similar identifier
CONTACT DETAILS	Telephone number, email address, fax number, address, country, city, postal code
FINANCIAL	Bank details, Credit/Debit card numbers, Tax Account Number (TAN), Payment card details and other related billing information
TECHNICAL	IP Address, Browser type, login Data, Traffic data, Surfing history, Operating system and platform, Time zone setting and location, Browser plug in types and version, Media access control address, smart phone defined username
TRANSACTIONAL	Services purchase history, payment to and from you
HR RELATED	CV's, Qualification, Character certificate, past employment information, Employment records, including remuneration details, attendance records, performance-related information

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USAGE	Information about how you use our website and service
SPECIAL CATEGORIES OF DATA	Health records, criminal records
OTHERS	Photographs, CCTV Images and videos

While we have attempted to make the list as exhaustive as possible, there is a possibility we may have omitted some categories due to the complexity of our organisation and the intricacies of our operations. We encourage you to get in touch with our Data Protection Officer if you find that any of your personal data which we collect is not listed in this Policy. We will then endeavour to promptly amend accordingly, although the non-inclusion of such item of personal data shall not be construed as excluding such data from the scope of this Policy.

5.1 Personal Data of under age child

We do not knowingly process data relating to a child under the age of 16, without the consent of his parents or guardians. If you are a child under the age of 16, please ensure that you (a) obtain the consent of your parents or guardians before providing such data to us; and (b) provide a record of such consent to us.

If you provide us with the personal data of another person, you are responsible for ensuring that such person is made aware of the information contained in this Policy and that the person has given you his consent for sharing his personal data with us.

5.2 Special categories of personal data

Special categories of personal data are data pertaining to racial or ethnic origin, political opinion or adherence, his religious or philosophical beliefs, membership of a trade union, physical or mental health or condition, sexual orientation, practices or preferences, genetic data or biometric data uniquely identifying someone or data relating to the commission or alleged commission of an offence.

We do not collect any of your personal data which falls within the special categories of personal data, unless:

- you have consented to the processing for one or more specified purposes;
- the processing is necessary:
- for the performance of a contract to which you are a party or in order to take steps at your request before entering into a contract;
- for compliance with any legal obligation to which we are subject;
- for the purpose of historical, statistical or scientific research; or
- for such other legitimate purposes as may be authorised by law.

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5.3 Cookies

Please note that we collect information via cookies and other similar technologies (such as web beacons).

Cookies are small text files that are automatically placed on your computer or mobile device when you visit a website. They are stored by your internet browser. Cookies contain basic information about your use of the internet. Your browser sends these cookies back to our website every time you visit it, so it can recognize your computer or mobile device and enhance your browsing experience.

For cookies management, refer to [cookies policy](#)

6 PERSONAL DATA, PURPOSES OF PROCESSING AND LEGAL BASIS

Ariva Ltee and its related companies receive and collect personal data about you directly from you or from the other data controllers for the purpose of providing or assisting with Services or requests to or from you as the beneficiary of a Service. Other data controller(s) too may disclose personal data to us such as your name, address, title or contact information, as necessary for us to provide Services to you. Upon your request, Ariva will provide you with the identity of the data controller(s).

Besides, your personal data is processed to fulfil the agreement that you have entered into with Ariva or Ariva's Suppliers or customers in order to take steps to provide or assist with your requests

You may wish to know that Ariva processes your personal data in accordance with applicable laws and that the legal basis for the processing of your personal data is either a contract, your consent or legal obligation(s) [Annex 2](#).

6.2 Visiting our Website

Ariva Ltée & Ariva Maritime Ltd is committed to preserving the privacy of users of our websites. When you visit our web pages, our web servers always temporarily save for connection and set up and security purposes the connection data of the computer connecting to our site, a list of the web pages that you visit within our site, the date and duration of your visit, the IP address of your device, the identification data of the type of browser and operation system used as well as the website through which you linked to our site.

Additionally, personal information such as your name, address, telephone number or e-mail address is not collected unless you provide this data voluntarily. The web tracking data will be stored for a period of 25 months and then automatically deleted. Furthermore, we are using cookies, tracking-tools and targeting measures.

As far as you have enabled geo-localisation functions in your browser and/or in your operating system, we will use this data to offer you location-based services (e. g. location of the nearest branch, packing station etc.). We will not use this data for any other purpose. If you disable this function your data will be deleted in due time.

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6.3 Performance of a Contract

For contractual reasons, we also need personal data to provide our services and comply with the obligations arising from contractual agreements concluded with you. This data is used e. g. for performing a (shipment) contract, managing customer data, handling payments and, as the case may be, assessing creditworthiness. Certain shipment data will also be provided to the authorities of the country of transit or destination for customs and tax clearance or for security screening, as required by the laws of such country. The information provided would usually include: shipper name and address, receiver name and address, description of the goods, number of pieces, weight and value of shipment.

6.4 Commercial material and newsletter from Ariva

Ariva processes your name, e-mail, and other contact information to send you promotional/ commercial materials such as invitation and information about events, newsletters and other relevant information about Ariva Ltée & Ariva Maritime Ltd and related subsidiaries

Your Personal Data is being processed in accordance with applicable laws and the legal basis for the processing of your personal data is your consent. You can always withdraw your consent for the continued processing.

Regardless of your purpose, we recommend that you do not disclose to us any sensitive personal data such as racial or ethnic origin, religion, trade union membership, sexual orientation, health, genetic or biometric data.

Furthermore, Ariva may anonymise and aggregate data, including personal data, gathered via our website or social platforms or through any booking system for statistical purposes to improve and expand Ariva's portfolio of services

In addition to the above, we collect personal data for a number of purposes including:

- To maintain a database of clients and potential clients in order to communicate with in respect of our services and matters related thereof;
- To comply with our legal obligations towards authorities including MRA, the Registrar of Companies and competent authorities;
- To keep a database of candidates who have sent CVs to us for potential job prospects;
- To keep appropriate employment - related information on employees;
- To provide facilities and benefits to our employees;
- For security reasons;
- To generate statistics and reports on different aspect of our business;
- For such other purposes as may be related, whether directly or indirectly to our business activities.

7 DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

Ariva may disclose your personal data to other entities in the Ariva Group, contracted service providers and advisors ("third parties"), if it is necessary in order to fulfil its obligations towards you. Contracted service providers can for instances be transporters, shipping lines, airlines, cargo agents, public authorities or IT-providers such as MACCS, MNS, track & trace, and booking.

Besides, Ariva may disclose personal data processed in connection with the use of Ariva websites, your participation in events or receiving of commercial information from Ariva to hosting companies, marketing companies or other providers necessary to provide you with the required services.

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Further, Ariva may disclose your information to comply with its legal obligations, to protect the rights, property and safety of Ariva or others or in case of a sale of/liquidation of any part of Ariva's business or assets.

Upon your request, Ariva can provide you with the identity of such third parties.

The third parties to whom the personal data is disclosed may be located outside your country of domicile, but Ariva will always ensure an adequate level of personal data protection and ensure that a lawful method for the transfer and disclosure of personal data is introduced, e.g. Confidentiality clause in contract.

8 THE PERIOD ARIVA PROCESS YOUR PERSONAL DATA

Your personal data is processed for as long as it is necessary in order to fulfil the purpose and in accordance with applicable laws. Your personal data will be deleted when it is no longer necessary to keep in order to fulfil the purpose, unless applicable laws require Ariva to keep it for a longer period. For example, how long the purpose exists, depend on the legal basis and circumstances around it (e.g. terms agreed in a contract with you, validity period of consent, legal interest, etc.) and countries to which the Services are being provided.

Personal data related to the use of Ariva Ltée's website will be deleted after 30 days at the latest, except from cookies, which will be deleted in accordance with Ariva Ltée's Cookie Policy.

If the processing of your personal data is based on your consent, the personal data will be deleted when you withdraw your consent at the latest, unless applicable law require Ariva to store the personal data for a longer period.

We use tracking software to determine how many users visit our website and how often. We do not use this software to collect individual personal data or individual IP addresses. The data are used solely in anonymous and summarized form for statistical purposes and for developing the website.

9 WHETHER THE SUPPLY OF PERSONAL DATA IS VOLUNTARY OR MANDATORY

The provision of personal data is entirely voluntary. However, if you choose not to provide your personal data to us, we may not be able to provide certain services to you or enter into a contractual relationship with you.

10 WHAT ARE YOUR RIGHTS?

In accordance with the laws, you have the following rights:

- **Accessing your Personal Data**

You have the right to request a copy of the personal data about you that we hold.

- **Updating your Personal Data**

Should your personal data is not complete and accurate, you may ask us to update any personal data about you.

- **Deletion of your Personal Data**

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You have the right to ask us to delete personal data about you where:

1. you consider that we no longer require the information for the purposes for which it was obtained;
2. you have validly objected to our use of your personal information - see *'right to object'* below
3. we are using your information with your consent and you have withdrawn your consent - see *'withdrawing consent to use your Personal Data'* below.

However, the data shall be retained for meeting the statutory, legal and regulatory requirements.

- **Right to object**

Where we use your personal Data to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal Data unless there are overriding legitimate grounds to continue

- **Withdrawing your consent to use your Personal Data**

Where we use your personal data with your consent you may withdraw that consent at any time and we will stop using your personal data for the purpose(s) for which consent was given.

- **Right to lodge a complaint**

In the event, you consider our processing of your personal information not to be compliant with the applicable data protection laws, you can lodge a complaint:

- Directly with Ariva by using this form (see [Annex 3](#))
- If you remain unsatisfied, you may lodge a complaint with the Data Protection Commissioner in Mauritius. Contact details are as follows:

Address: 5th Floor, SICOM Tower, Wall Street, Ebène

Email address: dpo@govmu.org

Phone number: + (230) 460-0253

Fax: + (230) 489-7346

11 SOCIAL MEDIA PLUG INS

On our website we are using social-media-plug-ins (like Facebook, google+, twitter etc.) in order to promote our brand, products and services and to get in touch with our customers. Therefore, these advertising purposes are regarded as carried out for a legitimate interest. It is the responsibility of the respective social-media provider to be in line with all applicable laws and regulations.

12 JOBS AND CAREER AT ARIVA GROUP

Career opportunities within Ariva Ltée & Ariva Maritime Ltd are as diverse as our teams. With approximately 1000 employees in over 800 cities, we connect people, improving their lives. If you would like to apply for one of our open jobs you will find more information, [here](#).

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13 HOW ABOUT DATA SECURITY?

Ariva Ltée & Ariva Maritime Ltd takes all of the necessary technical and organisational security measures to protect your personal data from being lost or misused. For instance, your data is saved in a secure operating environment which is not accessible to the public. In certain cases, your personal data is encrypted by Secure Socket Layer technology (SSL) during transmission. This means that an approved encryption procedure is used for communication between your computer and Ariva Ltée & Ariva Maritime Ltd servers if your browser supports SSL. Should you wish to contact Ariva Ltée & Ariva Maritime Ltd by e-mail, we would like to point out that the confidentiality of the information sent cannot be guaranteed. The contents of e-mail messages can be read by third parties. We therefore recommend you send us confidential information only by post.

14 USEFUL RESOURCES

Click to know more about the Data Protection Principles ([Annex 4](#)) which obtain under the Data Protection Act 2017 of Mauritius and which are adhered to by the Ariva Group.

15 AMENDMENTS TO OUR PRIVACY POLICY

We may update this Policy from time to time by making amendments to reflect changes to our data governance practices. The revised policy will be posted here with an updated revision date. We encourage you to check back periodically for any changes or updates. By continuing to use our websites after such revision takes effect, and by continuing to share your personal data, we consider that you have read and understood the changes.

