

### A NOTE FOR CUSTOMERS

# Sea's independence, data handling and relationship to the Clarksons group

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### How we handle our customers' data

Sea

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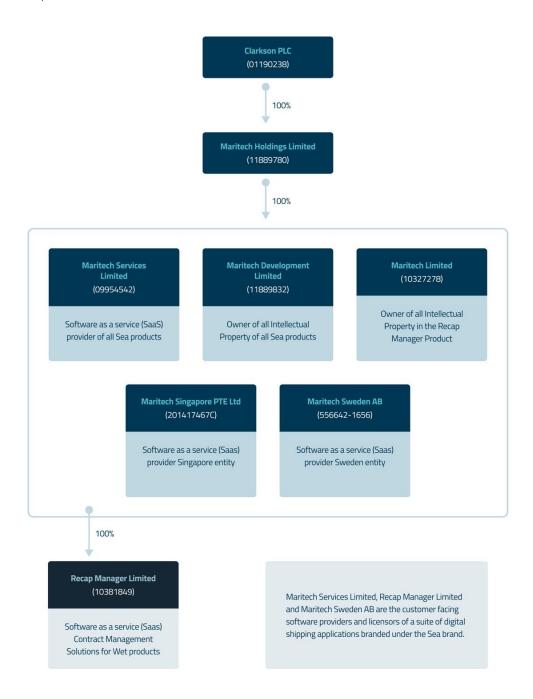
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# Sea and its relationship with Clarkson PLC and its subsidiaries (the Clarksons group).

Sea is proud to operate as a fully owned and independently managed shipping and software business within Clarkson PLC. It includes several companies within the Sea group, each performing a range of distinct roles, as outlined below:





## Ensuring clear separation between Sea and other businesses within the Clarksons group.

To maintain distinct operational boundaries between Sea's technology businesses and the broader Clarksons group—including its broking divisions—we have established the following key measures:

Data	Governance	Development	Support
separation	separation	separation	separation
Ownership of customer data remains with the customer of Sea.  Brokers have no access to any customer data unless they are themselves the broker of record for such transactions.	Sea's Senior Leadership Team is responsible for the executive management of the group. All Senior Leadership Team members are Sea employees and do not hold positions within the Clarksons group.	As a legally separate company within the Clarksons group, Sea ensures its development operations are fully independent.  Developers for all modules within the Sea product suite are physically segregated in a separate office space from employees of other parts of the Clarksons group.	Support for the Sea product suite is provided independently by a separately staffed Sea team. This team operates within its own support call infrastructure, in a separate physical location to other parts of the Clarksons group.

### Information security and legal protections

Our information security management system follows the requirements of the international standard ISO 27001. By using this framework and deploying applicable security controls and technologies, we continuously assess, manage and review information security-related risks.

The governance of these practices is managed and overseen by an Information Security Officer who works exclusively on behalf of Sea group companies.

#### CONFIDENTIALITY

Our standard terms of business include the following terms:

IPR ownership – specifying that Customer Data belongs to the Customer



Confidentiality – specifying that Sea must keep its Customers' information confidential. Sea
may only share it with third parties in connection with providing Sea's products and services –
for example, with Microsoft, which provides our Azure platform – under equivalent terms of
confidentiality.

Support Services Policy - this details Sea's support policies, including data backup, disaster recovery and customer data request policies.

#### Confidentiality, specifically regarding brokers

If a customer chooses to engage a broker to act on their behalf, that broker is also required to sign a licensing agreement with Sea. Under this agreement, the broker will be treated as the customer and will have access to confidential information as outlined in the agreement. Only the broker specifically appointed by the customer for a particular transaction will have access to this information.

Should you require any further information, please get in touch via

sea.live/contact-us/