

# PRIVACY STATEMENT

## HOW WE USE YOUR DATA

### WHO ARE WE?

We are SPI Marine (UK) Ltd – [Co. Reg. 8880136]

If you have any questions about this Policy, or about how we look after your data generally, please contact Graeme Harness.

### INTRODUCTION

SPI Marine (UK) Ltd is a 'data controller'. This means that, under the General Data Protection Regulation (**GDPR**), we may control and process your personal data and, in certain circumstances, special categories of data (previously known as sensitive data).

We take privacy very seriously. We are committed to keeping your data secure and processing it fairly and lawfully. We ask that you read this policy very carefully because it contains important information about how we process your personal data.

This policy is aimed at our clients, service users, staff and any other third parties interacting with us.

### PERSONAL DATA WE MAY COLLECT ABOUT YOU

We may obtain personal data about you (such as, but not limited to, your name, address, contact details, personal and social circumstances, subscription / payment details, whenever you complete a form for us, whether online or in person.

We may also collect information about you when our staff speak to you about our services.

In addition, we may monitor your use of our website through the use of cookies and similar tracking devices. For example, we may monitor how many times you visit, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some (but not all) of this data will be aggregated or statistical, which means that we will not be able to identify you individually. Please see further the section on '**Use of cookies**' below.

We may also receive information about you from other sources (such as relatives, referral agencies, commissioning bodies, strategic partners or your solicitors or accountants) which we will add to the information which we already hold about you.

### HOW WE USE YOUR PERSONAL DATA

We may use your data for one or more of the following purposes:

- As part of delivering our services to you
- Where we consider it necessary to be in your vital interests
- Where we are legally required to do so, such as because of a contractual obligation owed to a third party, such as a commissioning body
- For the purposes of assessing your application for services
- Administration

- Research, statistical analysis and behavioural analysis
- Direct marketing, where you have specifically consented
- Fraud prevention and detection
- Taking and processing payments
- Customising our website and its content to your particular preferences
- To notify you of any changes to our website or to our services which may affect you
- Security vetting
- Improving our services

## MARKETING AND OPTING OUT

We will not contact you for the purposes of direct marketing unless you have asked us to do so. However, if you have asked us to do so and later you change your mind, you can opt-out at any time with no hassle. To do this, just let us know. See further '**Your rights**' below for details about how to contact us.

## WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

**Third Party Service Providers working on our behalf:** We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## KEEPING YOUR DATA SECURE

We will use technical and organisational measures to safeguard your personal data, for example:

- Access to our systems is controlled by password and username which are unique to the user;
- We store your electronic personal data on secure servers;
- We store your paper records in locked fire-proof storage rooms;
- We train our staff in good records management;
- Payment details are encrypted

Non-sensitive details (your contact details and preferences for example) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE

We may store your data temporarily on our cloud service operated by Google. This may include limited special categories of data. We have taken appropriate steps to satisfy ourselves that your data will be secure during this process; we have a contractual relationship with Google that underpins this. As part of that security, Google may store your data in one or more of its international data centres, meaning that your data may be stored temporarily outside of the European Economic Area. If you have any concerns about this, please contact us using the details below.

## INFORMATION ABOUT OTHER INDIVIDUALS

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his or her personal data
- Receive on his/her behalf any data protection notices

## HOW LONG DO WE KEEP YOUR DATA FOR?

As a general rule, we will not keep your data for any longer than is necessary to complete tasks or provide you with services. We have a separate policy setting out retention periods for specific types of data. You can ask to see this policy by writing to us, using the contact details under the "**Your Rights**" section below. You also have the right to ask us to delete your data (sometimes known as '*the right to be forgotten*').

## COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. If you use our website, we may use cookies to:

- Track your use of the site;
- Recognise you whenever you visit this website (this speeds up your access to the site as you do not have to log on each time);
- Obtain information about your preferences, online movements and use of the internet;
- Carry out research and statistical analysis to help improve our content, products and services and to help us better understand our visitor/customer requirements and interests

- Target our marketing and advertising campaigns more effectively
- Make your online experience more efficient and enjoyable

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to the use of cookies. This includes cookies that are essential in order to enable you to move around the site and use its features and cookies that are not essential but gather information about your use of the site.

## YOUR RIGHTS

You have various rights under the GDPR, including the following rights:

- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, providing you with services), or consent to market to you, you may withdraw your consent at any time.
- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
  - we may ask you to verify your identity, or ask for more information about your request; and
  - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found below.

To exercise any of your rights concerning your information, please send an email to the following address:

**Graeme Harness – [gh@spimarineuk.com](mailto:gh@spimarineuk.com)**

Or write to us at the following postal address:

**SPI Marine (UK) Ltd**  
**The Barn, Huddlestons Wharf**  
**Millgate, Newark**  
**Notts NG24 4UK, UK**

We may ask you to provide us with proof of your identity. Please do not be offended; this may occur even if we know you. It is a requirement of the GDPR in some cases.

## REVIEW

This Policy was last reviewed on 24 May, 2018

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you access our website.

## THE INFORMATION COMMISSIONER'S OFFICE

More information about privacy laws can be found at [www.ico.org.uk](http://www.ico.org.uk)

Details of your local supervisory authority: The Information Commissioner's Office. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)
- [Live chat](#), via the ICO website
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF