

Crosshall Marine Ltd

Crosshall Road, St Neots, Cambs, PE19 7GE
Tel: 01480 472763 sales@crosshallmarine.com
www.crosshallmarine.com

PRIVACY NOTICE

Legal basis to collect, store and retain data

Crosshall Marine Ltd. have a legal right to collect and maintain personal information relating to any party with whom a contract is in place, or is in the process of being ratified. Our legal right to collect, store and process data is based on the company having a 'legitimate interest' to do so.

How we collect data

All our moorers complete a 'Moorer's Agreement' form. This document is the primary source of information when we set up manual and digital files to record your personal data. Prior to filling out a *Moorer's Agreement*, contact information may be temporarily stored on a company mobile phone, or elsewhere. Written authority to temporarily store personal data is required. Temporary records are transferred to CML's databases once a mooring agreement has been ratified. Otherwise, they are destroyed.

What we record

The personal details that are stored in paper and / or digital format are restricted to the following;

- a) Name (Full Name and Title)
- b) Home Address and / or Contact Address
- c) Mooring terms (Annual / quarterly / monthly)
- d) Stage number
- e) Craft make, model and length
- f) Telephone number / s (home / work / mobile) *
- g) e-mail address*
- h) Vehicle registration /s *

(*optional)

Where we record the data

- a) Index cards
- b) Moorers database
- c) Company mobile phone / s (pin-code protected) *
- d) Company accounts systems

(* with moorer's permission)

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How data are maintained:

We rely on customers to inform us of any updates in their personal details. Additions and amendments are carried out on an ad-hoc basis, as and when new or updated information is provided. Systematic data validation is carried out prior to each quarterly invoicing run.

As from 25th May 2018, changes must be notified in writing (e-mail accepted), thereby granting us the authority to store and process the updated data. The original data fields will be overwritten to reflect your current personal details, and superfluous (non-current) information will be deleted / destroyed unless retained for historic accounting purposes.

Use of your personal data:

Your personal data is reproduced when we;

- a) Send you an official E-mail
- b) Forward your e-mail to a third party (only at your request)
- c) Post printed documents to you

Personal data are transferred to computer systems and / or paper documents as appropriate.

Data security measures;

To maximise digital security and to prevent loss of data;

- a) Workstations have *first-level protection* (password to log-on to system)
- b) Files storing sensitive data have *second-level protection* (password to open file)
- c) Key depressions in password fields are encrypted by a Digital Password Manager application.
- d) Workstations are protected by a comprehensive real-time digital security suite and a discrete anti-malware application
- e) E-mails are sent / received and stored via an off-site high-security server
- f) Computer systems and core data are backed-up daily, and system files are cleansed regularly.

Access to records containing personal data in non-digital format (books, documents and hard copies) is granted to authorised CML employees only. These records are locked away when not in use.

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Retention of data

CML will store your personal data for as long as the company has a *legitimate interest* to do so. In the case of accounts records, these are retained for as long as is required by law (currently 6 years). Once CML has no operational or legal obligation to retain them, all electronic records of your personal details will be deleted and all paper records will be shredded (and disposed of responsibly) at the earliest appropriate opportunity.

Recipients of data

Unless by prior consent, or where legally obliged to do so, CML will never disclose your personal data to a third party. Access to our customer's personal data is restricted mechanically and / or electronically depending on storage format. Data are maintained by trained CML employees, or by an appointed agent with whom a '*Data Protection Agreement*' has been ratified.

Where a data-sharing policy has been ratified with a third-party contractor, and CML have been authorised to do so, and providing that there is a '*legitimate interest*' (GDPR) on the part of CML and yourself to do so, your contact details may be shared with a third party (e.g. for specialist boat-work such as canopy manufacture and fitting).

Exceptional circumstances

Where CML have acted as the broker in a boat sale, CML are obliged to provide the Environment Agency with the personal details of the new owner.

Your Rights

CML operate a transparent and accessible data protection policy. Please be aware that you have several data protection rights, including;

- The right of access to a copy of the information comprised in personal data files
- The right to object to processing that is likely to cause or is causing damage or distress
- The right to prevent processing for direct marketing
- The right to object to decisions being taken by automated means
- The right, in certain circumstances, to have inaccurate personal data rectified, blocked, erased or destroyed
- The right to claim compensation for damages caused by a breach of the Act