

## 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 Moorer's 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;

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

*(\*optional)*

Where we record the data

- Index cards
- Moorers database
- Company mobile phone / s (pin-code protected) \*
- Company accounts systems

*(\* with moorer's permission)*

### 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;

- Send you an official E-mail
- Forward your e-mail to a third party (only at your request)
- 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;

- Workstations have first-level protection (password to log-on to system)
- Files storing sensitive data have second-level protection (password to open file)
- Key depressions in password fields are encrypted by a Digital Password Manager application.
- Workstations are protected by a comprehensive real-time digital security suite and a discrete anti-malware application
- E-mails are sent / received and stored via an off-site high-security server
- 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.

## **CCTV**

CCTV is used for maintaining the security of property, premises and for preventing and investigating crime, it may also be used to monitor staff when carrying out work duties. For these reasons, and for health and safety purposes, the information processed may include visual images. This information may be about staff, customers and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary or required, this information is shared with the data subjects themselves, employees and agents, services providers, police forces, security organisations and persons making an enquiry.

CML has surveillance cameras covering the entrance road, office and surrounding area of the workshop. The system can take recurring photo snapshots throughout the day and be set to record movement in designated zones. These photos/videos are stored on the cloud for up to 14 days.

Images can only be disclosed in accordance with the purposes for which they were originally collected.

Camera monitoring maybe used to collate statics on marina activity to support improvement of customer service, no storage of video footage will be necessary for these statistics.

The Senior directors are responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of the Company's use of CCTV.

Only Senior directors have access to the system and recorded footage. Any complaints, requests for footage or enquiries about the operation of the Company's CCTV system should be addressed to Rachel Garrison or Julie Neville  
Email [info@crosshallmarine.com](mailto:info@crosshallmarine.com)

## How to complain about Data protection.

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the bottom of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Website: <https://www.ico.org.uk/make-a-complaint>

Crosshall Marine Limited,  
Crosshall Road,  
St. Neots,  
Cambridgeshire  
PE19 7GE

Company No: 01491166

Vat No. 3443333 0777

