



Privacy Notice for Clients and Suppliers

Scope

Sailport PLC is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your business relationship with us or during the use of our facilities, in accordance with the General Data Protection Regulation (GDPR).

It applies to all data subjects as individuals (customers or clients) or as representatives or agents of companies (suppliers) and other data subjects associated with those individuals or companies with whom Sailport PLC provide services to or conducts business with.

Responsibilities

Sailport PLC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to former, current and future data subjects as individuals (customers or clients) or as representatives or agents of companies (suppliers) and other data subjects associated with those individuals or companies with whom Sailport PLC provide services to or conducts business with.

This notice does not form part of any contract of employment or other contract to provide services or purchase supplies.

We may update this notice at any time. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Privacy notice

Our GDPR Owner and data protection representatives can be contacted directly here:

Company Secretary,
privacy@mayflowermarina.co.uk or telephone 01752 556633

Data protection principles:

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

Your Personal Data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal or business email addresses.
- Date of birth, Gender.
- Next of kin and emergency contact information.
- Boat details and Vehicle registration
- Purchase Orders, Invoices, and documentation related to sales or purchases
- Historical records of previous transactions linked to the data subject
- Details of devices connected to the internet using the Company's Wi-fi
- Insurance details
- Details relating to any Sailport PLC shareholdings
- Bank account details, credit/debit card details, tax status information.
- CCTV footage and other information obtained through electronic means such as barrier entry records.
- Information about your use of our information and communications systems.
- Photographs.

Special Categories

There are "special categories" of more sensitive personal data which require a higher level of protection.

- Information about your health, including any medical condition.
- Information about criminal convictions and offences.

Collection of data

We collect personal information about data subjects of individuals or as representatives or servant of companies in order to enter into contracts with those individuals or companies, to take steps to enter into those contracts or potential contracts and to administer the contracts entered into.

As an individual or as a representative or servant of a company we will process your data due to the circumstances of your relevant and appropriate relationship with the company. We will also use the personal details to personalise the communication and improve the experience of all data subjects involved. We may collect additional personal information throughout the period of the business relationship with the companies.

Direct marketing

We will also use your personal data for direct marketing purposes. Data subjects whom we direct market will on every occasion be allowed to withdraw consent or update or change their details.

How we will use information about you

We will only use your personal information when the law allows us to or where it is necessary for our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those interests. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where it is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

Use of your personal information

We need all the categories of information in the list above to pursue legitimate interests (3) of our own or those of third parties, primarily to allow us to enter into contracts (1) with companies, to take steps to enter into contracts or potential contracts and to administer the contracts entered into. We will also use the personal details to personalise the communication and improve the experience of all data subjects involved. (3)

We may also need all the categories of information in the list above to enable us to comply with legal obligations [2]. The situations in which we will process your personal information are listed below. We have indicated by [number] the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

- To personalise communication with potential, current and previous customers, suppliers and business contacts (1,2,3)

- For Direct Marketing purposes, including to communicate to potential, current and previous customers and business contacts about relevant and appropriate information and updates regarding our products and services. (1,2,3)
- To process invoices, purchase orders and make and receive payments. (2,3)
- To take steps to enter into a contract or potential contract with customers, suppliers or business contacts.(1)
- Administering the contract we have entered into with you. (1,2)
- Business management and planning, including accounting and auditing. (2,3)
- Assessing a supplier's qualifications related to the performance of a particular job or task (1,2)
- Gather evidence to support the investigation and resolution of any complaints (2,3,4)
- To make decisions about your continued provision of services or engagement. (1,2,3)
- Making arrangements for the termination of our customer, supplier or business relationship. (1,2,3,4)
- Dealing with legal disputes involving you, other customer, suppliers, contractors, including accidents. (2,3,4)
- Complying with health and safety obligations. (2,4)
- To prevent fraud. (2,4)
- To monitor your use of our information and communication systems to ensure compliance with our legal obligations and our legitimate interests. (1,2,4)
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution. (2)
- To conduct data analytics studies to review and better understand customer retention, satisfaction and attrition rates. (3)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information, we may not be able to pursue our legitimate interests, enter into contracts or take the steps to enter into contracts or potential contracts with you as an individual or your company or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis or legitimate interest which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or our legitimate interests and where your interests and fundamental rights or freedoms do not override those interests.

Data sharing

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

If we do, you can expect a similar degree of protection in respect of your personal information.

Sharing personal data with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you and your company or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following third-party service providers may process personal information about you for the following purposes:

Names of Providers	Activities carried out
Mazing Tree	Data Storage & IT Support
Bishop Fleming	Auditing of our Accounts
Jonas Software	IT Support
HMRC	Processing of our Taxes
Kenmare HR	GDPR Support
Barclays Bank	Making Payments
Post Office	Delivery of mail
Altitude Design Ltd.	Website designer
Go Daddy LLC t/a Media Temple	Website hosting

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We will only transfer the personal information we collect about you between the UK and your country of origin, or the countries where your company has businesses in order to pursue our legitimate interests where your interests or fundamental rights and freedoms are not overridden.

Your country of origin or other countries where your company has businesses **may not have** adequacy decisions by the European Commission in respect to the protection of personal data. This means that some of the countries to which we transfer your data are **not deemed** to provide an adequate level of protection for your personal information.

We will only transfer the minimum amount of personal data required to enable us to enter into contracts with your company, to take steps to enter into contracts or potential contracts and to administer the contracts entered into. We will also use the personal details to personalise the communication and improve the experience of all data subjects involved.

This will; include your name, email address, telephone number.

In addition, the transfer of personal data to a third country or an international organisation will only take place only if the transfer is not repetitive, concerns only a limited number of data subjects, is necessary for the purposes of a compelling legitimate interests pursued by the controller which does not override the interests or fundamental rights and freedoms of the data subject.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request from privacy@mayflowermarina.co.uk

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the Company Secretary. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a representative of or in the service of the company we will retain and securely destroy your personal information in accordance with our data retention policy or applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the company director in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the company director. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where your personal data is used for direct market you will on every occasion be allowed to withdraw consent or update or change your details.

Concerns

If you have any questions about this privacy notice or how we handle your personal information, please contact the company director. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Company Secretary

Company Secretary, privacy@mayflowermarina.co.uk, 01752 556633



Data Subject Consent Withdrawal Form

I, withdraw my consent to process my personal data from Sailport PLC.

Sailport PLC no longer has my consent to process my personal data for the purpose of (please be specific),

which was previously granted.

Yours sincerely,

Signed by data subject

Date withdrawal requested: