



PRIVACY POLICY

WHO ARE WE?

This privacy policy aims to give you the information on how Superyacht Crew UK collects and processes your personal data, including sensitive personal data through the use of this website, therefore acting as a data controller under the GDPR.

Superyacht Crew UK is a Recruitment business which provide the following services to its clients:

- Seeking candidates for clients
- Seeking work for candidates

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THE DATA WE COLLECT ABOUT YOU

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 individual has been removed (anonymous data)

CLIENTS

When working with clients across our organisation, we will collect data that will help us ensure a good and fair business relationship. Data we collect for this purpose will usually be basic. This data could include, but is not restricted to:

- Identity Data - includes first name, last name, username or similar identifier, marital status, title, date of birth and gender
- Contact Data - includes billing address, delivery address, email address and telephone numbers
- Financial data includes bank account and card payment details
- Transaction Data - includes details about payments to and from you and other details of the service you have purchased from us.
- Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- Profile Data - includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data - includes information about how you use our website, products and services.
- Marketing and Communications Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

CANDIDATES AND INDIVIDUALS

To ensure the best service when working with you as a candidate, or to ensure that accurate and necessary information is provided when offering consultation and advisory services, we may collect the following types of personal data. The list below is basic, and not exhaustive.

During the course of providing you with work seeking services we may collect some or all of:

- Name
- Contact details
- Sex/gender
- Date of birth
- Education background
- Employment history
- Immigration status
- Nationality
- Copy of passport / ID card / other form of identification
- Tax and Financial information
- National Insurance Number
- Details of criminal convictions where applicable to the role
- Current salary and package
- Any further information that you tell us included in future employment preferences
- IP addresses
- Dates that you make contact with our organisation
- Any other information we are asked to provide under any law.

CLIENTS

We collect personal data from you in the following ways.

Personal data that you give us

- You contact us by phone or email
- We contact you by phone or email
- Business Development activities which result in us gaining personal data such as phone numbers and email addresses.

Personal data we receive from other sources

- Advertisements, media, networking tools and websites
- Delegate lists from meetings, events and conferences

Personal data that we receive automatically

- IP Addresses
- Information and data we collect via marketing tools and by using our website and opening emails.

CANDIDATES AND INDIVIDUALS

We collect personal data from you in the following ways.

Personal data that you give us:

- Registering your cv and details on our website.
- Applying for a job we are advertising online using a job board
- Sending us a copy of your cv or your contact details which enables us to contact you.
- Information that you offer us as part of any consultancy project

Personal data we receive from third parties:

- Information that our clients share with us about you as part of a recruitment or consultancy project
- Any information we may find about you on company websites, job boards, networking sites (such as LinkedIn)
- Any information that is shared with us via a reference
- Information which is found on Social Media channels (such as Facebook, Twitter, Instagram etc)

Personal data that we receive automatically

- IP Addresses
- Information and data we collect via marketing tools and by using our website and opening emails.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or trying to enter into with you. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

YOUR PERSONAL DETAILS

Your personal details may be given to us in a variety of ways, including, but not limited to the following:

- You may send your details to us directly via email or another method.
- You may register and upload your details on our website.
- We may upload your details from a job board, or external data base.
- We may be given your details as part of a consultative service we provide.

We must have a legal basis for processing your personal data. For the purposes of providing you with work seeking services, consultation services and information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see

below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

WHAT WE NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Where you have consented to us processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting the following e-mail address:

hello@superyachtcrewuk.co.uk

DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

We will delete your data if we haven't had any contact from you (or for clients, the company you work for or with) for a three-year period.

For the purposes of this policy, relevant contact means:

- Communicating with us via email, telephone or mail
- Submitting your CV or applying for a role
- Registering and logging onto our website.
- Clicking through from any of our email communication.

LEGAL BASES FOR PROCESSING YOUR DATA

We believe that we have a legitimate interest in processing your data for the purposes of providing work seeking services to both our clients and candidates, to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

By processing your personal data, we believe that we are able to offer a more bespoke and personal service and that this is in all party's best interests.

CLIENTS

Our organisation sells solutions, and therefore to provide you with good, bespoke and effective service, we retain information of the clients that we work with. Information that we retain includes, but is not limited to the following:

- Details of key contacts, including email addresses, phone numbers.
- Notes from meetings and conversations had with key contacts.
- Emails exchanged with key contacts or other contacts within the organisation.
- Details of jobs, previous jobs or other recruitment.
- We retain this information as we believe that it falls within our legitimate interest in providing services to our clients.

CANDIDATES AND INDIVIDUALS

- If you are looking for employment or have posted your CV onto a job board or networking site, we believe that it is a fair assumption that you are happy for us to collect and use your data to offer or provide you with recruitment services. This might include us sending your details to our clients who may have a suitable opportunity for you as well as matching your details against other job vacancies we may have.
- We may at times have to provide a service to you to comply with processes such as paying invoices, making payments to you via our payroll, in which case, we see it within our legitimate interest to have your details in order to complete this activity.
- From time to time we may have to share your data with authorities which are to comply with our legal, regulatory and tax obligations and we have a legitimate business interest in doing so.
- If you are job seeking, we believe that we can often help you by contacting you with possible options, and therefore may use your details to contact you about with relevant information, and relevant information to help you in your job search.
- If working on a consultancy project, it is often necessary to process your data to ensure we have correct information and detail on matters.

GIVING YOUR CONSENT

Sometimes it will be necessary for us to obtain your consent to process and hold your data, in particular when processing sensitive data. In cases such as this you have the following rights:

- You have to give your consent freely
- You have to know what you are consenting to
- You should be able to control your consent
- We will keep a record of your consent
- You have the right to withdraw your consent

HOW WE USE YOUR PERSONAL DATA

We will only use the personal data collected from candidates and other individuals when the law allows us too. Most commonly, we will use your personal data in the following circumstances:

Recruitment Services

Our primary function is to provide you recruitment services including presenting you with candidates. To enable us to provide these services we will process your data in the following ways:

- Storing your data on our database so we can contact you in relation to recruitment activities
- Recording notes of conversations and meetings
- For targeted marketing campaign
- Where we need to perform the contract we are about to enter into or have entered into with you
- 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.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

MARKETING ACTIVITIES

We strive to provide you with choices regarding certain personal uses, particularly around marketing and advertising. We may use your identity, contact, profile data to form a view on what we think you want or need, or what maybe of interest to you. This is how we decide which services and offers maybe relevant for you (we call this marketing). You can ask us to stop sending marketing information or you can unsubscribe from receiving them at any time.

To help establish, exercise or defend a legal claim. Occasionally we may need to use your data to establish, exercise or defend a legal claim.

MARKETING

If you have contacted us in the past, for example when you sent a CV, registered on our website, we may use your details to send you details of services and opportunities that may benefit you. For any further marketing we will need your consent.If you do not wish to receive any marketing from us, you may withdraw your consent at any time by unsubscribing through our email system, you may unsubscribe at any time.

RECRUITMENT AND WORK SEEKING SERVICES

CANDIDATE AND INDIVIDUALS

As part of our recruitment service, we will forward your personal data, when relevant to opportunities with our clients as we see relevant. We may use and process your data as part of a consultation project which we are carrying out on behalf of a client.

- To provide you with a recruitment service
- Submitting your data to prospective employers
- Assessing your data against open vacancies to determine your suitability
- Storing your details on our database so that we can contact you in relation to future vacancies
- To meet our obligations of any contracts between you and us
- To meet our obligations of any contracts between us and third parties with regard to your recruitment
- To send you appropriate updates on the job market that may be of interest.
- Facilitating of payroll and invoicing processes
- Verifying details that you have provided (e.g. references, qualifications and criminal convictions)
- Complying with our legal obligations

SENSITIVE PERSONAL DATA

From time to time we may need to collect and retain sensitive personal data such as information about health and medical conditions.

- Details on criminal convictions
- Details on a scenario at work that may be sensitive or be deemed private and confidential, or one of the protected characteristics under the equality act.
- In these scenarios, we will ask for your explicit consent, and you may withdraw this consent at any time.

TO HELP ESTABLISH, EXERCISE OR DEFEND A LEGAL CLAIM

Occasionally we may need to use your data to establish, exercise or defend a legal claim.

DISCLOSURES OF YOUR PERSONAL DATA

We share your data with a variety of other parties during the course of conducting our business, in a number of ways, for a number of reasons

Third Parties -

- Third party services providers who perform work on our behalf (e.g. auditors, lawyers, IT providers etc.)
- Professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in UK who require reporting of processing activities in certain circumstances.
- Marketing technology providers
- Job boards and networking tools

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

If you suspect that your data has been misused, or has been compromised please contact us immediately at hello@superyachtcrewuk.co.uk

KEEPING YOUR DATA SAFE OUTSIDE THE UK

- Our business works with client and candidates all over the world therefore have a need to and store your data internationally. This could be:
- To overseas clients
- Our clients may transfer your data internally
- To data storage facilities
- To our suppliers where appropriate

The company may transfer only the information you provide to us to countries outside the European Economic Area (“EEA”) for the purposes of providing you with work seeking services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises of the EU member states plus Norway, Iceland and Liechtenstein.

THIRD - PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

COOKIES

Our website stores a number of different cookies on the computer or device that you use to access our website. Cookies are small text files used by browsers to store small bits of information about a device or computer, such as preferred settings or preferred languages.

Cookies do not take up much space (unless you have thousands of them) and cannot contain viruses or other harmful code.

The majority of our cookies are category 2 cookies, although other websites/services that we use, such as Facebook, Twitter, Instagram, YouTube, LinkedIn may store category 3 cookies on your computer when you visit our website or share content.

CHANGE OF PURPOSE

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

COMPLAINTS PROCEDURE

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. If you wish to complain about this privacy notice or any of the procedures set out in it please contact us on: hello@superyachterewuk.co.uk

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

CONTACT US

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