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# **PRIVACY NOTICE**

1. IMPORTANT INFORMATION AND WHO WE ARE

**1.1 What is the purpose of this document?**

Stream Marine incorporating Stream Marine Training Ltd (SC640302) and Stream Marine Careers Ltd (SC635879) (“we / us / our”) are committed to protecting the privacy and security of your personal data. Our registered address is Stream House Building 29, Campsie Drive, East Campus, Glasgow International Airport, Paisley, PA3 2SG.

This privacy notice aims to give you information on how we collect and process your personal data through your use of our website and during and after the supply of products or use of any of the services provided by us.

This notice applies to anyone who uses our website or who buys or uses any of our products and / or services.

We may update this notice at any time, and you should refer to it from time to time to keep updated about how we process your personal data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are processing your personal data.

**1.2 Third-Party Links**

Our 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 notice of every website you visit.

1. THE TYPES OF INFORMATION 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 identity has been removed (anonymous data).

The personal information we collect about you will depend on the products and services you use and subscribe to.

We will collect, store, and use the following categories of personal information about you as follows:

* **Identity Data** including personal contact details such as name and title.
* **Contact Data** including addresses, telephone numbers, and personal email addresses.
* **Financial Data** including bank account details, your debit or credit card information and other banking information.
* **Transaction Data** including your billing history and products and services you use and anything else relating your account.
* **Profile Data** including information you provide to us in your communications with us, information you provide to us when entering prize draws or competitions or participate in surveys.
* **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
* **Health Data (Special Category)** including recent ailments, injuries and allergies. Due to the physical nature of some of the training courses we offer, this information is required.

We may also collect **technical data** and information on how you use our products and services, including:

* Your activity on our website.
* The date, time, duration, and cost of your communications including your phone location at the time these communications are made.
* The phone numbers that you call and send messages to (and the phone numbers that you receive calls and messages from).
* Your phone or device usage.
* Your data usage.

We do sometimes need to process additional personal data and / or special category personal data, but we will only do so when this is in accordance with data protection legislation.

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 are trying to enter with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

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.

1. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about you through:

* Direct interactions. You may give us your Identity, Contact, Financial and Transaction Data when you use our website, when you purchase our products and services and during the sales process. Personal information including address, date of birth and relevant medical data is collected by way of paperwork when you arrive at our facility.
* Third parties or publicly available sources. We may sometimes receive personal data and additional information from third parties including our partners and business directories.

We will collect additional personal information while performing our contract with you and in providing our products and services to you throughout the period of your contract with us.

1. HOW WE WILL USE INFORMATION ABOUT YOU

We will only process your personal information when the law allows us to. We will process your personal information in the following circumstances:

1. Where we need to perform the contract, we have entered into with you, including pre-contractual negotiations.
2. Where we need to comply with a legal obligation.
3. Where we have your consent.
4. 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.
5. Where we are acting in the vital interests of a data subject.

**Situations in which we will use your personal information**

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To process and deliver your order including:   * + - * 1. Carrying out our obligations arising from any contracts entered between you and us;         2. To confirm that your orders have been received and to process them;         3. To provide our products and services;         4. To provide you with the information and services that you request from us;         5. For billing purposes, to manage payments, fees and charges         6. To collect and recover money owed to us | (a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e)Marketing and Communications | 1. Performance of a contract with you. 2. Necessary for our legitimate interests (to recover debts due to us). |
| To validate you as a registered customer when using our services and calling our customer services. | (a) Identity  (b) Contact | 1. Performance of a contract with you. |
| To notify you about changes to our services and to make suggestions and recommendations to you about goods or services that may be of interest to you. | (a) Identity  (b) Contact  (c) Technical  (d) Profile | 1. Necessary for our legitimate interests (to develop our products/services and grow our business). |
| For the administration of files and records; business management and planning, including accounting and auditing. | (a) Identity  (b) Contact  (c) Technical | 1. Necessary for our legitimate interests (for running our business, provision of administration and IT services). 2. Necessary to comply with a legal obligation. |
| To prevent fraud. | (a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e) Technical | 1. Necessary for our legitimate interests (to prevent fraud). 2. Necessary to comply with a legal obligation |
| To send certain communications (including by email and SMS) to you including service announcements and administrative messages and other communications relating to our services. | (a) Identity  (b) Contact  (c) Technical | 1. Performance of a contract with you. 2. Necessary for our legitimate interests (for running our business, provision of administration services, network security and in the context of a business reorganisation or group restructuring exercise) |
| To ensure security for you and our staff and help maintain service quality (calls to our customer services may be monitored and/or recorded for authentication, security, quality and training purposes). | (a) Identity  (b) Contact | 1. Performance of a contract with you |
| To help the emergency services. | 1. Identity 2. Contact | 1. Where we are acting in a data subject’s vital interests |
| To comply with applicable laws, regulations, court orders, government, and law enforcement agencies’ requests, to operate our systems properly and to protect ourselves, our users and customers and to solve any customer disputes. | (a) Identity  (b) Contact  (c) Financial  (d) Transaction | 1. Where we need to comply with a legal obligation. 2. contract |

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

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

**Promotional offers from us**

We may use your Identity, Contact, Technical and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

**Third-Party Marketing**

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, course registration, product/service experience, certificate requirements or other transactions.

COOKIES

Our website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and allows us to improve the website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you.

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 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.

1. DATA SHARING

We may share your personal data with third parties, including third-party service providers and other entities in our group.

We require third parties to respect the security of your data and process it in accordance with the law.

We will not generally transfer your personal information outside the UK / EEA unless authorised to do so by law.

"Third parties" includes other entities within our group and third-party service providers (including our suppliers), such as:

* Our partner companies or agencies and their sub-contractors or prospective partners who help us run our services,
* Other companies in our group, their respective partners, agents and sub-contractors.
* Third parties whose products and services we market to you (where you have given permission to receive such messages).
* Other communications companies.
* New or prospective owners of Stream Marine Training Limited.
* Data processors or data controllers who enable us to deliver our products and services to you.

We will only transfer your personal data outside of the UK / EEA where it is lawful for us to do so.

1. DATA SECURITY

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 data and special category personal data 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 will notify you and any applicable regulator, including the Information Commissioner’s Office of a data breach where we are legally required to do so.

1. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we process it for, based on legal requirements and / or best practice

DATA SUBJECTS RIGHTS **Your rights in connection with personal information**

Under certain circumstances you have the rights in relation to:

* **Request access** to your personal data (commonly known as a "data subject access request").
* **Request correction** of the personal data that we hold about you.
* **Request erasure** of your personal data.
* **Object to processing** of your personal data
* **Request the restriction** of processing of your personal data. 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 information to another party.
* **Rights in relation to automated decision-**making about you.

If you want to exercise any of these rights, please contact our data protection officer or any member of our staff.

1. 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 our Data Protection Officer in writing (see contact details below) or any of our team. 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. Please note that, if you withdraw your consent, this will not affect the lawfulness of any processing carried out before you withdrew 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

1. DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

The contact details of our DPO are as follows:

Claire Beckley

RGDP LLP

Email: [claire@rgdp.co.uk](mailto:claire@rgdp.co.uk)

Tel: 0131 222 3239

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 ([*www.ico.org.uk*](http://www.ico.org.uk/)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1. CHANGES TO THIS PRIVACY NOTICE

This version was last updated on 1st September 2021 and historic versions can be obtained by contacting us.

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 our Data Protection Officer or email us at [bookings@streammarinetraining.com](mailto:bookings@streammarinetraining.com),