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Privacy Policy

# Who are we?

Stream Marine Training (SMT) is a world-class provider of fire-fighting, sea survival, survival craft, and HSE training for the global maritime, oil and gas, renewables, and construction industries. We deliver a range of approved and mandated courses including STCW, MCA, MNTB, PASMA and QUALSAFE with efficiency and a focus on our customers’ requirements that is unparalleled. We support our customers through every stage of training – prerequisite learning, the course itself, transportation, accommodation, sustenance, certification, and all elements of delegate welfare.

Our Registered address is

Stream Marine Training Group Ltd

Stream House Building

29 Campsie Drive

Glasgow Airport

Paisley PA3 2SG

Telephone: +44 (0)141 212 8777

Stream Marine incorporating Stream Marine Training Ltd (ZB168465), Stream Marine Training Group Ltd (ZB173891), and Stream Marine Careers Ltd (ZB173862) (referred to in this document as “we/us/our”)

Stream Marine Training Ltd, Stream Marine Training Group Ltd and Stream Marine Careers Ltd are classified as ‘data controller’ in their own right under the UK General Data Protection Regulation. We are notified as data controllers with the Information Commissioner’s Office under the above registration numbers.

We take the privacy of our students, cadets, stakeholders, suppliers and subcontractors and other contacts extremely seriously and is committed to protecting your personal information and complying with all current data protection legislation during any processing of data relating to the supply our products and services.

# How do we collect information from you?

We use any personal information that you provide to us online or via:

* application forms
* CVs and qualifications
* telephone conversations
* emails
* letters
* data collected on site
* any other type of correspondence.

Data protection principles

We will comply with the data protection principles, which are that personal data will be handled with:

* Lawfulness, fairness, and transparency
* Purpose limitation
* Data minimisation
* Accuracy
* Storage limitation
* Integrity and confidentiality (security)
* Accountability

# What type of information is collected from you?

When you participate in or sign up to any of our services such as events, training, cadetships or online newsletters, we will collect and store personal information about you. We will also collect information about you if you supply us with goods and services.

This information can consist of, but is not limited to:

* 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.
* Qualifications.
* 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).

What personal data we collect will depend on how you are engaging with us.

By submitting your details, you enable us to provide you with the products or services that you have selected and agreed we will provide.

# How is your information used?

We will use your personal information for a number of processing purposes including:

* providing you with the information you have asked for about our products, services and activities and ensuring any requests or enquiries you may have made from us are dealt with in a manner that is sufficient for both you and us
* we may need to contact you for reasons related to the service or activity you have signed up to for example, changing the details about a course you have booked. We call this “Service Administration”
* we may need to contact you about an application that you have made or a service that you supply

# What is the lawful basis for us to process your personal data?

Our legal basis for collecting and using your personal data is usually due to the processing being necessary for a contract between yourself and us.

On occasions we will process your data to comply with our legal obligations.

We may also process your personal data based on our legitimate interests as long as your fundamental rights and freedoms do not override that legitimate interest. When we process your data based on our legitimate interest, we always identify such interest, make sure the processing is necessary to achieve it, and carefully consider your interests, rights, and freedoms against our legitimate interest in a balancing test. Our legitimate interests includes use of CCTV on site, and soft opt in options for marketing communications.

We may also process your personal data based on consent, vital interests and in connection with a public task.

Special categories of data require higher levels of protection. This is data which reveals race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, sexual life and sexual orientation.

We may process special categories of information in limited circumstances, and this will normally be with your consent.

How long will we keep your personal data?

We only keep your information for as long as it is necessary to fulfil the purposes for which the personal information was collected. This includes for the purpose of meeting any legal, accounting, or other reporting requirements or obligations.

As a general rule, we keep your personal data for the duration of statutory time periods or in accordance with best practice.

If you do not wish to provide your personal data

If you do not wish to provide your personal data, we may not be able to enter into an agreement with you, such as products we provide and services that we render which you have required.

# Who has access to your information?

We do not sell or rent your information to other organisations.

We may share your personal data with third parties, including third-party service providers and other entities in our group. When we do this, we disclose only the personal information that is necessary to deliver the service and we have an agreement in place that requires them to keep your information safe and secure and not to use it for any other purpose.

We require third parties to respect the security of your data and process it in accordance with the law. Third parties include 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.
* Your employer for clarification of applications to attend courses and supply of certificates and results from the training

Any personal data we share with third party controllers or processors outside the UK only occur where we have ensured that these are subject to appropriate safeguards, as set out in Chapter V of the UK General Data Protection Regulation.

We will not release your information to other organisations unless in exceptional cases when we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. In all other instances, we would only share your information with another party if you have given your explicit permission to do so.

# Social media platforms

If you engage with us on any of our social media channels (Stream Marine Training Ltd - Home | Facebook and Stream Marine Training | LinkedIn) you should know that we do not collect your personal information from these sources. It remains within the platform that we are using and so you should familiarise yourself with their privacy notices and policies.

We may use information you provide to share updates, news and events, in the form of customised online advertising. If you send us a direct message, your information still remains within the platform unless we ask you to provide us with your contact details to continue the conversation offline or privately, and you consent to do that.

# Cookies

Many websites use 'cookies' which are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit.

We use some unobtrusive cookies to store information on your computer. We also use some non-essential cookies to (anonymously) track visitors and help to enhance user experience of the Website. These all expire when the browsing session ends.

Our website occasionally contains hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and are also likely to use cookies, and we therefore urge you to review them. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

For more information on cookies, see our cookie policy on our website.

# Your individual (data subject) rights

You have a choice about whether you wish to receive marketing information from us. If you give permission to receive communications about our work and our products, services and events, you can select your choices when we collect your information. If you wish to make any changes to your preferences, please let us know and we will update our records.

You have the right at any time to:

* ask for a copy of the information about you held by us in our records;
* require us to correct any inaccuracies in your information;
* in certain situations, make a request to us to delete your personal data;
* request we restrict processing your personal data;
* object to us processing your personal data; and
* right to portability

Requests can be made in a number of ways, including in writing or verbally. You will need to provide:

* Adequate information for example full name, address, date of birth, etc.so that your identity can be verified, and your personal data located.
* An indication of what information you are requesting to enable us to locate this

You should direct your request to the Data Protection Lead or the Data Protection Officer – (details of whom can be found below).

We aim to comply with requests for access to personal data as quickly as possible. We will ensure that we deal with requests within 30 days of receipt unless there is a reason for delay that is justifiable.

# What if the data we hold about you is incorrect?

It is important that the information which we hold about you is up to date. It is important that you let us know about any changes by contacting us using the contact details at the end of this Privacy Policy.

# Security precautions to protect loss, misuse or alteration of your information

We take our duty to protect your personal information and confidentiality very seriously and we are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper.

In order to make sure that your rights and freedoms are not put at risk and relevant laws and regulations are observed, we have implemented appropriate technical and organisational measures are in place to ensure a sufficient level of security to the personal data processing. These measures include:

* Regular training and testing of our employees and contractors
* Introduction of relevant internal policies and processes which are regularly reviewed and updated under the supervision of our Data Protection Lead and our Data Protection Officer; and
* Carefully assessing our suppliers to ensure they adhere to data protection requirements.

# Processing card payments

Where you use your credit or debit card to purchase from us, we will ensure that this is carried out securely. We do not store your card details for use in future transactions.

# Links to other organisation’s websites

Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website‚ so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

# Questions and complaints

Please contact us if you have any questions about our privacy notice or about the information we hold about you. You can contact our Data Protection Lead at bookings@streammarinetraining.com.

Alternatively, you can contact our Data Protection Officer by email: info@RGDP.co.uk or by telephone 0131 222 3239.

If you are concerned or unhappy with how we have dealt with your query/complaint you can contact the Information Commissioner’s Office:

Information Commissioner’s Office

Wycliffe House

Water Lane,

Wilmslow

SK9 5A

www.ico.gov.uk

Alternatively, you can contact the equivalent national privacy authority in your country, if outside the UK.

# Privacy Notice Review

We review this notice bi-annually or as and when changes in legislation or internal procedures require it. This notice is reviewed by the Data Protection Officer. Please ensure that you visit our website from time to time, to check for any updates to this Privacy Policy.

**Privacy Policy last updated: June 2022**