



Updated – 20 October 2024

DATA PRIVACY POLICY

1. About this Policy

- 1.1 This policy explains when and why we collect personal information about those who use Ellis Marine Services Ltd, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy policy from time to time without prior notice. You are advised to check our main website “ellismarineservices.com” or on-board our vessel “High Hopes” for any amendments (but amendments will not be made retrospectively)
- 1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner “www.ico.gov.uk”. For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.
- 1.5 The data privacy policy is stored within the SMS (ships management system) on board our vessel “High Hopes” and a copy of the Data privacy policy can be viewed on request

2. Who are we?

- 2.1 We are “Ellis Marine Services Ltd”.
- 2.2 Contact details as follows:

Ellis Marine Services Ltd
71, Dane Crescent
Ramsgate
Kent, CT11 7JS

3. What information we collect and why.

3.1 Contract (paper form, electronic & processed data)

Type of information	Purposes	Legal basis of processing
Name Address telephone numbers E-mail address(es)	Managing the swimmers / passengers / crew to complete our contract	Completing the contract with the swimmers / passengers / crew For the purposes of our legitimate interests in operating our company
Date of birth / age related information Nationality Passport Number	Managing the swimmers / passengers / crew to complete our contract	Completing the contract with the swimmers / passengers / crew For the purposes of our legitimate interests in operating our vessel.
Gender	Provision of adequate facilities are available on board our vessel "High Hopes"	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities for each gender.

3.2 Passenger medical awareness (SMS 7.4) Crew Medical Awareness (SMS 7.7)

Type of information	Purposes	Legal basis of processing
Name Address Telephone numbers, E-mail address(es) Date of birth / age related information Nationality Passport Number Gender	Managing the swimmers / passengers / crew information in a medical emergency	Protecting the swimmers / passengers / crew vital interests and those of their dependants
Swimming information Medical conditions Medication	Masters awareness and managing the swimmers / passengers / crew information in a medical emergency	Protecting the swimmers / passengers / crew vital interests and those of their dependants

3.3 Safety Instructions for passengers (SMS 7.3)

Type of information	Purposes	Legal basis of processing
Swimmers / Passengers Signature	Informing the swimmers / passengers of the safety procedures	Protecting the swimmers / passenger's vital interests and the safe operation of our vessel "High Hopes"

3.4 Crew familiarization (SMS 10.5)

Type of information	Purposes	Legal basis of processing
Crew / contractor Signature	Informing the crew / contractor of the safety procedures	Protecting the crew / contractor vital interests and the safe operation of our vessel "High Hopes"

3.5 CCTV

CCTV is being recorded continuously via the on-board camera system	Information is stored on board via a black box hard drive and over recorded every 3 days	Recordings are only taken from the black box when there is a potential incident, this information remains the property of "Ellis Marine Services" and stored in a secure cloud base vault
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3.6 General items

Photos and videos of Swimmers / passengers	Putting on our website and social media pages and using in press releases.	Consent. We will seek the Swimmers and passengers consent on their contract. The Swimmers / passengers may withdraw their consent at any time by contacting us by e-mail or letter.
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4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction

- 4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure
- 4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk

5. Who else has access to the information you provide us?

- 5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in paragraphs 5.2 below.
- 5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf. We do this for the purpose of our legitimate interests in operating a safe vessel and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes

6. How long do we keep your information?

6.1 Swimmers / Passengers

We will hold your personal data on our system for two years or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to hold it. If we decide that we are not entitled to do so, we will stop processing your personal data except that when we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

Crew / Contractors

We will hold your personal data on our system for two years after crewing duties have been relinquished or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to hold it. If we decide that we are not entitled to do so, we will stop processing your personal data except that when we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

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

For more details, please get in contact with us “Ellis Marine Services” where we can assist with any questions you may have