

## ***Privacy Notice– Spectrum Offshore Limited***

Spectrum Offshore Limited and our group companies (hereinafter referred to as “we” or “us”) are committed to protecting and respecting your privacy and personal data. Under data protection law, individuals have a right to be informed about how we use any personal information we hold about them.

This privacy notice is provided to make you aware of how and why we process any personal data that you give to us, or any that we may collect from or about you. It applies to all products, services and any other circumstances where we collect your personal data. It provides you with information that must be provided under the EU General Data Protection Regulation, commonly referred to as GDPR.

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and /or our privacy practices. We encourage you to check this notice on a regular basis.

### **What types of personal information about you do we process?**

Personal information that we may process in connection with our products and services if relevant, necessary and accurate includes:

- a. Personal and contact details, such as title, full name, job title, your employer, department and contact details
- b. Records of how and when you contact us
- c. Products, services and events you have been interested in
- d. Information gathered using cookies in your web browser
- e. Any information you provide to us via telephone, emails or other digital media

### **How do we collect your data?**

We collect information about candidates from the following sources:

- a. From you directly, for example, if you make an enquiry as to our services or to provide a service to us
- b. Information generated about you when you use our website
- c. From publicly accessible professional profiles, such as LinkedIn
- d. Information collected from other third parties

The above data will be stored on a range of media, including on the company’s secure storage servers and on other IT systems such as email.

### **Why do we collect your data?**

We use your personal data, including any of the personal data listed above, for the following purposes:

- a. Managing any aspect of the services we offer to our clients
- b. To perform our products and services and internal processes
- c. To improve the operation of our business
- d. To monitor and keep records of our communications with you and our staff
- e. For direct marketing communications. We may send marketing to you by SMS, email, phone, post and/or social media
- f. To comply with legal and regulatory obligations, requirements and guidance
- g. To share information, as needed, with business partners and sub-contractors to provide the services which you have requested of us
- h. To respond to queries and complaints
- i. To respond to and defend against legal claims

## **What is our lawful basis for using your personal information?**

We only collect and use personal information about you when the law allows us to. We rely on the following legal bases to use your personal data:

- a. To meet contractual obligations where it is needed to provide you with or receive from you a service, such as:
  - i Updating our records, ensuring we still have your correct details
  - ii Contacting you directly to organise service delivery or to provide service proposals
- b. Where it is in our legitimate interests to do so, such as:
  - i We might require your data for legitimate interests and will process your data in a way which might reasonably be expected as part of the running of our business and which does not materially affect your rights, freedoms or interests;
  - ii To manage our business operations, including accounting
  - iii To carry out monitoring and to keep records of our communications with you and our staff
  - iv For direct marketing communications. We may send marketing to you by SMS, email, phone, post and social media where we think it may be of interest to you. You are of course free to opt out of hearing from us by any of these channels at any time
  - v Where we need to share your personal information with people or organisations in order to run our business
- c. To comply with our legal obligations:
  - i We may need to share data with law enforcement
  - ii We may need to send you communications required by law such as updates to this Privacy Notice
- d. With your consent or explicit consent:
  - i For some direct marketing communications

Where you have provided us with consent to use your data, you may withdraw this consent at any time. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

If the reasons for collecting your personal information change, we will let you know and seek your consent where applicable. We will not use your information for any purpose for which we have not informed you without first notifying you as to the change and lawful basis under which we intend to process your information.

## **Data sharing with third parties**

We would not sell your information to third parties. But we may, from time to time, share information with the following third parties for the purposes listed above:

- a. Members of the Group
- b. Governmental and regulatory bodies such as HMRC
- c. Other organisations and businesses who provide services to us such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- d. Sub-contractors who have a direct role in providing a service or quotation to you as our client

We take steps to ensure that any third-party partners who handle your information comply with data protection legislation.

## **How we protect your data**

We take the security of your data seriously. We have internal policies and security controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessible except by our employees and business partners in the proper performance of their duties.

We have put in place procedures to deal with any suspected or actual data security breach and will notify you and any applicable regulator of a suspected breach within the timeframes required by law.

### **How long do we retain your information?**

We do not hold your information in an identifiable format for longer than is necessary to either fulfil a contract with you or manage the business relationship. As we are a purely business-to-business supplier of services, we would only hold your information for as long as you are employed in a relevant position or are a representative of a potential supplier or client.

### **How and when can you withdraw your consent?**

Where we are relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below

### **What should you do if you wish to update your information?**

You should tell us if your details change using the Contact Us section of our website.

### **Transferring data internationally**

Where we (very rarely) transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law. We will only do this after we have obtained your consent to do so.

### **No obligation to provide data**

We are unable to provide certain services or products to you if you do not provide us with certain information. In the cases where providing some personal information is optional, we will make this clear.

### **Your rights**

You, as a data subject, have a number of rights. They do not apply in all circumstances. If you wish to exercise any of them, we'll explain at that time if they apply or not:

- a. The right to withdraw your consent (where we rely on it);
- b. The right to be informed about the processing of your personal information
- c. Access and obtain a copy of your data on request
- d. In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- e. Require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- f. Object to the use of your personal data if it would cause, or is causing, damage or distress
- g. Prevent your data being used to send direct marketing
- h. Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- i. Request the restriction of processing of your personal data. 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; and
- j. Request the transfer of your personal data to another party.

If you would like to manage your information or exercise any of these rights, please contact us via email at [info@spectrum-offshore.com](mailto:info@spectrum-offshore.com) or in writing at Spectrum Offshore Limited, 1 West Barn, Efford Park, Milford Road, Lyminster, SO41 0JD.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office (ICO).

**Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact us at [info@spectrum-offshore.com](mailto:info@spectrum-offshore.com).