



YACHTDATABANK PRIVACY POLICY

1. INTRODUCTION

YachtDataBank is committed to protecting and respecting your privacy. This privacy notice is designed to provide information about our practices concerning the collection, use and disclosure of your personal information in the course of providing legal, advisory and/or consultancy services, carrying out marketing and recruitment activities. This privacy notice sets out how we use, or may in the future following further App development use and protect your personal information.

2. WHO ARE WE?

YachtDataBank ("we"), are the Data Controller for the purposes of data protection law in relation to any personal information we hold about you.

YachtDataBank Ltd. is a limited liability company registered in England and Wales with company number 11390823 and our registered office is at 320d High Road Benfleet, Essex, SS7 5HB, United Kingdom. We are registered with the Information Commissioner's Office.

We are committed to maintaining high standards of confidentiality in relation to the information provided to us in the course of our business.

Please read this notice carefully and should you have any questions please contact us if you have any queries by emailing us at: info@yachtdatabank.com, or by writing to:

Data Protection Officer
320d High Road Benfleet,
Essex, SS7 5HB
United Kingdom

3. WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to everyone whose personal information we collect and process (excluding our existing or former employees and consultants, to whom a separate HR Privacy Notice applies). This includes individuals in the categories below or who work for any of the following:

- *our clients;
- *our partners;
- *our suppliers;
- *people who are involved in contracts and transactions we are working on, such as other businesses or individuals our clients are contracting with;
- *our regulators, insurers, auditors, professional advisers and certification/accreditation bodies
- *prospective employees, consultants and partners; and
- *people whose details we process in connection with our marketing activities.



4. WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal data, or personal information, means any information about an individual from which that person can be identified.

In the course of our business, we will need to collect and process various types of personal information for various purposes. Given the nature of our business and the services we provide, it is impractical to list all the categories of personal information that may be collected and processed. We will however only process and collect personal information where we have a legal basis to do so.

We most commonly collect and process the following kinds of personal data about you:

- *contact information for individuals for the rendering of services (such as full name, job title, organisation, date of birth, address, email address, telephone number, mobile phone number, identity document details). We may collect additional information to enable the identity of individuals to be verified;
- *financial information, including your bank account and payment card details;
- *crew status, including professional membership/registration, photos;
- *Yacht registration and ownership documentation and records;
- *Insurance policy details relating to Yacht or persons;
- *marketing and communications data, including your marketing preferences and interests and any feedback you provide to us (for example, by completing a survey). We may also track when you receive and read marketing communications from us.

5. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We use different methods to collect personal information from and about you including:

Direct interactions: you may voluntarily provide us with your personal information, for instance when you:

- *download and initialize the Web Application from our website;
- *respond to a product fault alert email from your mobile device and/or your traditional email;
- *correspond with us by email or post;
- *speak to us in person or on the phone;
- *give us feedback (for example, by completing a survey);
- *register for one of our online learning tools, webinars, events and/or conferences.

Automated technologies or interactions: as you interact with our website, we may automatically collect information about your browsing activities and your equipment, collecting this information by using cookies. For full details about our use of cookies, please see our Cookie Policy.

Publicly available sources: we may collect personal information available publicly from the publicly accessible and online sources such as:

- *online professional social networking services and applications, such as LinkedIn;
- *your company's website;
- *Companies House.



Third party sources: we may collect personal information from the following third party sources:

- *our clients;
- *our agents;
- *fraud prevention and credit reference agencies;
- *government agencies.

6. HOW DO WE USE YOUR PERSONAL INFORMATION?

Legal basis on which we will use your personal data.

We will only use your personal information when the law allows us to do so, i.e. where we have a lawful basis for processing information. Most commonly, we will use your personal information in the following circumstances:

- *Where we need to perform the contract to supply services we are about to enter into or have entered into with you.
- *Where it is necessary to do so in order to comply with any legal obligations we have, such as under money laundering laws.

On the basis of consent:

- *Where we rely on your consent for processing this will be brought to your attention when the information is collected from you.
- *You have the right to withdraw consent at any time, see the Your Rights section below for further information about how you may withdraw your consent.
- *We do not rely on or require your consent for the majority of our processing.

Where the processing is necessary for our legitimate interests in:

- *providing legal and/or advisory services;
- *ensuring regulatory compliance;
- *providing our clients with the best service;
- *promoting our services;
- *receiving feedback; and
- *improving our services and identifying ways to grow our business.

and/or for the legitimate purposes of our clients or other third parties in receiving those services. We will only rely on this lawful basis where we consider that your interests and fundamental rights do not override such interests.

When processing your personal information we comply with the provisions of this privacy notice and, in respect of the provision of legal services we are also bound by professional obligations of confidentiality, and/or for the legitimate purposes of our clients or other third parties in receiving those services. We will only rely on this lawful basis where we consider that your interests and fundamental rights do not override such interests.

Special category data.

In most cases, we only process special category data when encountered in the process of an engagement instruction from a client. Where Special Category Data is encountered, it is not stored or copied in any way.



Purposes for which we use your personal data

We may process your information for the following purposes:

Marketing

We process personal information in connection with marketing or communications purposes, including so that we can:

- *send you invitations to our online learning tools, webinars, events, and/or conferences as and when we think they might interest you;
- *share with you news and offers about our products and services;
- *email you with cyber security updates and newsletters relevant to sectors and specialisms that you are interested in;
- *ask you for feedback (for instance, in a survey) about our client services, and to manage, review and act on the feedback;
- *manage any changes to your marketing preferences or comply with any unsubscribe requests; and
- *monitor our website usage and improve our services, please see our Cookies Policy below for further information on how we use cookies to do this,

Recruitment

We process personal information in connection with our recruitment practices for the following purposes:

- *recruiting new employees, consultants and partners;
- *verifying immigration status and/or eligibility to work in the UK;
- *undertaking pre-employment checks; and
- *obtaining references.

7. WHO MIGHT WE SHARE YOUR INFORMATION WITH?

For the purposes set out in the 'How we use your personal information' section above, we may share your personal information with the following categories of third parties, some of whom we appoint to provide services, including:

- *emergency services internationally;
- *professional advisors, suppliers and sub-contractors in the course of the provision of physical or cyber security or other services or in the performance of any contract we enter into with you.
- *event venues, webinar hosts and training providers to provide you with access to our events and training;
- *providers of business support services including technology, banking, insurance, litigation support and security;
- *analytics and search engine providers that assist us in the improvement and optimization of our site;
- *providers of business development and marketing support services;
- *survey or quality assurance providers in order to receive feedback and improve our services.



Additionally, we will disclose your personal information to the relevant third party if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, to protect your life, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our clients, our clients people. our regulator, or others.

Where we share your personal information with third parties, as described above, we will only do so where in our reasonable opinion that information will be adequately protected.

Any other service providers with whom we share information are approved by us and subject to contractual obligations designed to ensure that those providers comply with data protection legislation.

Transferring personal information outside of the UK &/or EEA

We may transfer personal data outside the United Kingdom and/or European Economic Area ("EEA") where adequate protection measures are in place in compliance with data protection laws. For example, this may be in relation to an international assistance task to protect your life, render medical assistance following an incident, or where we are sharing information with our colleagues or third party service providers who operate outside the UK &/or EEA in order to fulfil our obligations to you.

We also use IT Service providers based outside the UK and/or EEA who provide us with software, maintenance and support in order for us to better provide you with our services. We ensure that any related transfers are either subject to an adequacy decision or are protected by the Commission approved Standard Contractual Clauses.

Third party links

Our website may include links to third-party websites, plug-ins and applications. 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,

8. HOW CAN YOU CHANGE YOUR MARKETING PREFERENCES?

We strive to provide you with choices around what marketing communications you receive from us. To ensure that we continue to provide you with the most relevant information, you can review and update your marketing preferences at any time by clicking 'unsubscribe' or 'manage preferences' in any of our emails.

To request that we stop processing your personal information for marketing purposes, you can opt-out of all communications at any time by clicking 'unsubscribe' or 'manage preferences' in any of our emails, or by emailing cancel@yachtdatabank.com and we shall stop processing your information for those purposes.



If you have consented to receive marketing communications from us, you can withdraw this consent at any time by clicking 'unsubscribe' or 'manage preferences' in any of our emails, or by emailing info@yachtdatabank.com, and we will stop processing your information for those purposes. See Your Rights section below for further information about your rights to withdraw consent and opt-out.

9. HOW LONG WE KEEP HOLD OF YOUR INFORMATION?

We retain personal data in accordance with our retention and destruction policy.

If you cancel your subscription to the service, we will ensure that all of your personally identifiable information is permanently deleted within 30 days of you requesting us to delete it by emailing us at cancel@yachtdatabank.com.

We will also delete your personal account after a period of 180 days after your annual renewal date if your subscription to your YachtDataBank account is not renewed. We will not store or process your personal data for any longer than necessary.

YachtDataBank records of boat data are retained for the lifespan of the boat. When you unsubscribe from our services or sell your boat your personal details and information regarding you and your crew will be deleted. The records and data relating to the boat will be retained and made available to the new registered owner of the boat.

10. HOW IS YOUR INFORMATION KEPT SECURE?

We are strongly committed to data security and we take reasonable appropriate steps to protect the personal information we hold from unauthorised access, loss, misuse, alteration or corruption. We have put in place physical, electronic and managerial procedures to safeguard and secure that information.

11. WHAT ARE YOUR RIGHTS IN RESPECT OF YOUR DATA?

If we process your personal data, you have the following rights. You can exercise these rights at any time by emailing us at info@yachtdatabank.com or by using the other contact details given in the 'Contact details' section below.

You have the right:

*to ask us not to process your personal data for marketing purposes (either by clicking 'unsubscribe' or 'manage preferences' in any of our emails, or by emailing info@yachtdatabank.com).

*to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;

*to withdraw your consent at any time, you can do this by emailing info@yachtdatabank.com. However, 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;



- *to ask us not to process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest;
- *to request from us access to personal data we hold about you;
- *to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- *to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the lawful basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation or the data is children's data and was collected in relation to an offer of information society services;
- *to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing); and
- *to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

12. WHAT CAN YOU DO IF YOU HAVE CONCERNS ABOUT OUR USE OF DATA?

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting our CEO in the first instance by using the contact details below. If we are unable to resolve your concerns and you remain dissatisfied, you have the right to complain to the relevant supervisory authority, which is the Information Commissioner's Office in the UK. The ICO's contact details are available here: <https://ico.org.uk/concerns/>.

13. WILL THERE BE CHANGES TO THIS NOTICE?

This privacy notice may change from time to time so we recommend that you review it periodically. This version of the privacy notice was last updated on 01 January 2022.

14. HOW CAN YOU CONTACT US?

Please read this notice carefully and contact us if you have any queries by emailing us at: info@yachtdatabank.com or by writing to:

Data Protection Officer
YachtDataBank Ltd.
320d High Road Benfleet,
Essex, SS7 5HB
United Kingdom