

# **PRIVACY POLICY**

## **Last updated: September 2020**

### **1. INTRODUCTION**

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Inch Cape Offshore Limited (the 'Company') takes your privacy seriously and is committed to protecting your personal information and to being transparent about what information we hold. The Company also understands its obligations to help you to understand how and why we process your personal data.

This policy explains what personal data (information) we hold about you, how we collect it, how we use it and how we may share information about you when you use our website or communicate with us. We are also required to notify you of this information under data protection legislation.

Please ensure that you read this policy ('Privacy Policy') and any other similar notices we may provide to you from time to time when we collect or process personal information about you.

Where in this notice we refer to 'we' or 'our' or 'us' we are referring to the Company and where we refer to 'you' or 'your' we are referring to users of our website and where you interact with us.

### **2. WHO COLLECTS THE INFORMATION**

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In relation to this website, your data controller is the Company. However, if your data controller is another member of our affiliated entities and group companies, we will make that information clear to you at the time your personal data is collected.

### **3. DATA PROTECTION PRINCIPLES**

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We will comply with the data protection principles when gathering and using personal information. GDPR gives individuals a number of specific rights, depending on the circumstances, namely:

- To be informed about how, why and on what basis that data is processed (this information is communicated in this Privacy Policy);
- To obtain confirmation that their data is being processed and to obtain access to it and certain other information, by making a Subject Access Request;
- To have data corrected if it is inaccurate or incomplete;
- To have data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing (this is sometimes known as 'the right to be forgotten');
- To restrict the processing of personal data where the accuracy of the information is contested, or the processing is unlawful (but the data subject does not want the data to be

erased), or where the Company no longer needs the personal data but the data subject requires the data to establish, exercise or defend a legal claim; and

- To restrict the processing of personal data temporarily where the data subject does not think it is accurate (and the Company is verifying whether it is accurate), or where the data subject has objected to the processing (and the Company is considering whether the Company's legitimate grounds override the data subject's interests).

If you wish to exercise any of these individual rights, please contact our Data Compliance Manager, who can be contacted at [datacompliancemanager@inchcapewind.co.uk](mailto:datacompliancemanager@inchcapewind.co.uk).

#### **4. ABOUT THE INFORMATION WE COLLECT AND HOLD**

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The type of information that we (or third parties on our behalf) may collect from you depends on how you use our website, and may include:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address(es);
- Any information you choose to provide to us when filling out the contact form on our website;
- Your IP address and other technical information which tells us how you use our website (eg. the pages you click on);
- Your geographic location (country/territory where you are living and/or working);
- Information collected during the recruitment process when you apply for a vacancy with us on our website (including CV, cover letter and professional (and other) qualifications);

#### **5. HOW WE COLLECT THE INFORMATION**

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We (or third parties on our behalf) will only collect information that is necessary for us to provide you with the service you have requested such as when you use the contact form on our website or when you apply for a vacancy with us.

Where you use our website, we will process your personal data collected by using cookies in accordance with our Cookie Policy. Please refer to our Cookie Policy for further information on this.

## **6. WHY WE COLLECT THE INFORMATION AND HOW WE USE IT**

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We will typically collect and use this information for the following purposes:

- To communicate with you;
- To investigate any complaint you make;
- To enhance the security of our network and information systems;
- To analyse how our website is being used;
- To host, maintain and otherwise support the operation of our website;
- To comply with our legal and regulatory obligations;
- To establish, exercise or defend our legal rights, including where we reasonably consider it is in our (or others) legitimate interests.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

## **7. HOW WE MAY SHARE THE INFORMATION**

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We will not transfer your data to third parties, unless we are legally obliged to do so, or the data transfer is necessary for the execution of a contractual relationship or you have previously consented to the disclosure of your data. The purposes for which we share your personal data may include:

- If you have applied for a vacancy with us and this vacancy has already been filled or we believe that you would be better suited for another role, we would like to forward your application within the Company;
- If you have expressed an interest in being a supplier to the Company;
- Providing, reviewing and/or receiving services in relation to our website (such as suppliers of technical, support and installation services, security providers and cloud services providers);
- As required by the law.

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

Our website uses Google Analytics, which works using cookies. We use the information collected by Google Analytics cookies to find out about how visitors use our website. Please refer to our Cookie Policy for further information on this, or alternatively you can opt-out of Google Analytics by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

## **8. WHERE INFORMATION MAY BE HELD**

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Information may be held by the Company and those of our affiliated entities and group companies or third-party service providers as described above. Information may also be transferred internationally to China and to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

**By providing us with your personal information, you expressly consent to our transferring your personal data to countries or jurisdictions which may not provide the same level of data protection as your home country, including without limitation countries or jurisdictions outside the UK.**

## **9. HOW LONG WE KEEP YOUR INFORMATION**

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We keep your information for no longer than is necessary for the purposes for which the personal information is processed. The length of time we retain it for depends on the purposes for which we use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

Whilst we continue to process your personal data, we will ensure that it is treated in accordance with this Privacy Policy. Otherwise, we securely erase your information once this is no longer needed.

We store the information collected by Google Analytics for 12 months.

## **10. YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED**

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Please contact our Data Compliance Manager, who can be contacted at [datacompliancemanager@inchcapewind.co.uk](mailto:datacompliancemanager@inchcapewind.co.uk) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. Our Data Compliance Manager can provide you with further information about the right to be forgotten, if you ask for it.

## **11. KEEPING YOUR PERSONAL INFORMATION SECURE**

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We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **12. HOW TO CONTACT US**

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If you would like to contact us in relation to your rights or if you are unhappy with how we've handled your information, please contact us here: [datacompliance@inchcapewind.co.uk](mailto:datacompliance@inchcapewind.co.uk)

If you're not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113.

## **13. CONFIDENTIALITY**

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We acknowledge that the information you provide may be confidential. We do not sell, rent, distribute or otherwise make personal data commercially available to any third party except that we may share information for the purposes set out in this Privacy Policy. We will maintain the confidentiality of and protect your information in accordance with our Privacy Policy and all applicable laws.

## **14. CHANGES TO THIS PRIVACY POLICY**

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We may make minor changes to our Privacy Policy. When we make these changes we will publish the updated Private Policy on our website. If we make any material changes, we will take additional steps to inform you of these.