# Steve Sawford Marine Ltd Data Privacy Policy

# 1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our customers, 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 website (<a href="www.sailingforall.com">www.sailingforall.com</a>) regularly 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 (<a href="www.ico.gov.uk">www.ico.gov.uk</a>). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

#### 2. Who are we?

2.1 We are Steve Sawford Marine Ltd (SSM Ltd). We can be contacted at: Steve Sawford, SSM Ltd, Unit 7 Henson Close, Telford way Industrial estate, Kettering, Northamptonshire, NN16 8PZ E-mail address: info@sailingforall.com Telephone: 01536 515 558

# 3. What information we collect and why

Type of information	Purposes	Legal basis of processing
Customer's name, address, telephone numbers and e-mail address (es).	Managing the customer's enquiries and purchases of goods and services from SSM Ltd.	Performing the contract between SSM Ltd and the customer.
Bank account details of the customer or other person making payment to SSM Ltd.	Managing the provision of the goods and services to the customer.	Performing the contract between SSM Ltd and the customer.
Supplier's name, address, telephone numbers and e-mail address (es).	Managing SSM Ltd/suppliers enquiries and provision of stock and services to SSM Ltd.	Performing the contract between SSM Ltd and the supplier.
Employees and representatives of suppliers to SSM Ltd	Entering into and managing arrangements with suppliers	Entering into and performing the SSM Ltd contracts with suppliers
Bank account details of the supplier or other person that SSM Ltd is making payment to for stock or services.	Managing the purchase of stock and services to SSM Ltd by the supplier.	Performing the contract between SSM Ltd and the supplier.
www.sailingforall.com and www.speedysports.co.uk Website data Statistical website user information The use of Cookies	Managing the effectiveness of both of the SSM Ltd websites.  (Full details are laid out in section 8 of this SSM Ltd Data Privacy Policy)	For the purposes of our legitimate interests in operating and promoting the SSM Ltd.

## 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 For any payments which we take from you online we will use a recognised online secure payment system.
- 4.5 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 the table above or 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 (e.g. to print product and service details and send you mailings). We do this for the purpose of our legitimate interests in operating SSM Ltd and for performing our contract with you. However, we will disclose only the personal data that is necessary for the third party to deliver the service and where we need to do this we will put 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 We will hold your personal data on our systems for as long as you are a customer or supplier of SSM Ltd and for as long afterwards as it is in legitimate interest of SSM Ltd to do so 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 process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that 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 the following 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

## 8. Website privacy - www.sailingforall.com and www.speedysports.co.uk

#### 8.1 Web statistics

In common with many commercial organisations we monitor the use of this website by collecting statistical user information. No personally identifiable data is collected in this process. Typically, we collect information about the number of visitors to the website, to each web page, the technology used to browse the internet and the domain from which the visitor originated. This information is used to understand the visitor's use of the website.

#### 8.2 Cookies

Cookies are small files which are sent to your web browser and stored on your computer's hard disk. This website itself doesn't drop cookies, however, third party tools added to the site may use and leave cookies on your computer. This includes tools like Google Analytics, social media such as Facebook and Twitter and embedded videos from sources like YouTube. We will try and make you aware if cookies are present and give you the opportunity to opt out.

You can also disable cookies in your website browser preventing them being saved. This may affect some of the websites functionality.

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For more details regarding this SSM Ltd Data Privacy Policy, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager, Steve Sawford, SSM Ltd, Unit 7 Henson Close, Telford way Industrial estate, Kettering, Northamptonshire, NN16 8PZ

E-mail address: info@sailingforall.com Telephone: 01536 515 558

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