

Type:	Manual	Version:	2.0	Classification:	Routine
Created:	Q2 2018	Review date:	01/09/2018	Status:	Live
Title	SOP 2.1 Annex I Privacy Policy				



1. Introduction

Our Privacy Policy applies to the personal data that Ambrey collects and uses.

References in this Privacy Policy to “Ambrey”, “we”, “us” or “our” mean Ambrey Limited and the Ambrey Group of companies:

- **Ambrey Limited** Company registration no: 10222741
Ambrey Group registered address - Suites 6 & 7, Thorn Business Centre, Rotherwas, Hereford, HR2 6JT, United Kingdom.
- **Ambrey Risk Limited** Company registration no: 7374749.
- **Ambrey International Limited** Company registration no: 10095821
- **Ambrey Offshore Limited** Company registration no: 8592553
- **Ambrey Services DMCC** Company registration number: DMCC 4685, registered address - 3401-01, Swiss Tower, Jumeirah Lakes Towers, Dubai, UAE.

Ambrey controls how your personal data is collected and the purposes for which we use your personal data. Ambrey is the “data controller” for the purposes of the UK Data Protection Act 1998 or the EU Regulation 2016/679 (GDPR) when the regulation comes into effect.

In our provision of maritime and risk management services Ambrey want all stakeholders to be fully informed and up-to-date with how Ambrey uses data.

If you provide your information (‘data’) and consent to use it the manner in which Ambrey use your information is set out in this policy.

If Ambrey share information (‘data’) with you and you have agreed to operate within the GDPR Regulation guidelines the manner in which Ambrey use this information is set out in this policy.

This Privacy Policy explains the following:

- The types of data that we might collect
- How we store and handle that data
- How we keep data safe
- How we communicate our data processes
- The legal basis on which we manage your data

Ambrey commit to:

- Managing your data responsibility IAW this Policy and Appendix Compliance Statement
- Routinely reviewing all policy and procedure every quarter inclusive of data management
- Not removing your data from our systems without your explicit consent to do so
- Publishing revisions to this Privacy Policy on the company website

If you have any queries, questions or would like to report an issue regarding this policy, please contact us: privacy@ambrey.com / +44 (0) 203 503 0330

2. Who we collect information (data) from & why we collect it

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that

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we may hold. Your personal data includes, for example, your name, your contact details or data from when you interact with us.

We collect some personal data from you, for example when you work with Ambrey, use our website, use our services or simply contact us. We may also receive your personal data from our suppliers who provide services to you on our behalf (for example when you provide feedback on our services).

We collect, process and issue information/data from three groups including – but not limited to – the stakeholders listed below:

Businesses	Clients	People
Shipping Agents	Owners	Full Time Employees
Licencing Bodies	Charterers	Temporary Employees
Manpower Providers	Sub Charterers	Consultants
Employment Agencies	Pool managers	Operational Personnel
Flag State Authorities	Brokers	Marine Crew
Insurance Providers	Masters	
IT Providers		
Financial Services		
Legal Services		
Certifying Bodies		

- Note1: All stakeholders Data Processers.
- Note2: Ambrey Senior Management are Data Managers for the departments they run
- Note2: Ambrey department staff are Data Processers.

The nature of the maritime and risk management business means that we have to process and share relevant data on a daily basis, because every task / project is different, and we work with many different suppliers, partners, sub-contractors and clients all over the world.

Each group of stakeholders (clients, people, third-party organisations) has a Data Manager who also acts as the responsible data controller for that particular group.

If you have any queries regarding how Ambrey manage data, you can get in touch at any time.

Details and contact information for the Data Manager of each of these departments can be found in **Appendix 1 Data Management**.

3. Categories of data we collect

The law on data protection sets out several different reasons for which a company may collect and process your personal data, including:

Consent

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- We can collect and process data with consent. When collecting and processing personal data we do so in accordance with the requirement.
- *For example, flag approval submission of team details, quarterly declaration of deployment to insurers.*

Contractual obligations

- We need personal data to comply with our contractual obligations.
- *For example, if you want to work for us as a sub-contractor, we may need personal information about such as your employment history to make sure you are qualified to meet the requirements expected from our clients and industry supply chain.*

Legal compliance

- If the law requires us to, we may need to collect and process an individual's data.
- *For example, we can pass on details of people involved in fraud or other criminal activity affecting the Partnership to law enforcement.*

Legitimate interest

- In specific situations, we require an individual's data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact their rights, freedom or interests.
- *For example, if you are a subcontractor who has worked for us before, we may use your email address to contact you about future employment opportunities.*

We may collect and process the following categories of information:

Categories of personal data processed	When do we process the personal data mentioned?	Which legal basis do we rely on for processing your personal data?
Your name and surname and your contact details (email address, job title, telephone number and postal address) IT account login details (staff/consultants only)	When you interact with one of our IT systems When you interact with one of our staff When you order or use one of our services	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services. When you order or use one of our services, our processing is based on us being able to fulfil the supply or contractual agreement / order with you.
Information about your (industry) course or event (audits/Cx/Op meetings) bookings, if you require special assistance or if you have specific dietary requirements.	When you book or manage your participation	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services. Insofar as we receive any sensitive information from you, e.g. information on your health or religion, our processing will be based on consent, which we will ask you to provide upon receiving the information. In respect of your ordering of courses and

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		events we may also process you information based on us being able to fulfil the agreement with you for delivering these services.
Your public CV profile covering the professional part.	When you act as a speaker or associated contributor at an Ambrey event	We base the processing on our legitimate interest in being able to inform our clients / workforce (staff/operational personnel) of your credentials relevant to the event you are speaking or contributing to.
Information about your use of our contracts and related transactions	When you use contractual agreements with Ambrey	We base the processing on our legitimate interest in running our daily business and being able to assess how our services are used.
Records about your role within the Ambrey Group and on behalf of Ambrey Group business	When you conduct business on behalf of the Group or others associated with the Group	We base the processing on our legitimate interest in running our daily business in the most efficient way.
Information about your transactions, including bank details and payment card details	When you purchase Ambrey products or services	We base the processing on us being able to fulfil the purchase agreement or service order with you.
Information about your personal financial, tax and insurance details	When you are contracted to the Ambrey team	We base the processing on us being able to fulfil the payment terms of your contracted agreement with us.
Your communications with us (for example, your emails, letters, telephone calls)	When you contact Ambrey or you are contacted by Ambrey	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Pictures or videos taken at Ambrey events which may include you. Pictures taken during delivery of Ambrey services which may include you. Pictures taken by you during delivery of Ambrey services.	When you participate in a Ambrey event or course or when delivering Ambrey services	We will base the processing on consent, which we will ask you to provide if relevant. In certain circumstances, we may however base the processing on our legitimate interest, if the pictures or videos are of a situational character and does not specifically depict you.

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Your posts and messages on social media directed to Ambrey	When you interact with us on social media	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services. We ask that you do not disclose sensitive information such as health information in messages on our social media platforms. If you do so anyhow, we reserve the right to delete such information from platforms we control, unless we have a legal basis such as your consent to process the information.
Feedback	When you reply to our requests for feedback or, on occasion participate in company surveys	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Information about how you use our website, from where you access it and what system you use when accessing it	When you navigate to and on our website www.ambrey.com	We process this information based on your consent and compliance
Information that relates to the services you provide to Ambrey	When you obtain, renew or cancel contractual arrangements with Ambrey	We base the processing on our legitimate interest in running our daily business and being able to provide you with our services.
Historic data	When you no longer hold contractual arrangements with Ambrey	We base the processing on our legitimate interest in being able to document Ambrey history and required reporting to external bodies for audit and legal purposes

4. How we use your personal data

We use your personal data for the following purposes:

In the provision of professional services

When you ask for advice, participate in our delivery of services (ie. commercially, operationally or via training), when attending events or meetings (ie. workshops, audits), when you use our website or products or when recording quarterly / annual statistics / reports, we use your information to perform our services in relation to any of

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the above. *For example, to answer an enquiry, to issue an invoice, to determine who created a contract or to issue an exam certificate.*

To communicate with you and manage our business requirements

Occasionally we may need to contact you by email or phone for administrative, commercial or operational reasons. *For example, in order to send you information related to your involvement in our delivery of services, invoices, confirmation of bookings and payments, or to notify you of information relevant to the delivery of services (routine and non-routine). Notifications are for information sharing purposes relevant to the industry and not for marketing purposes.*

Your opinion is very important to us, so we may contact you for feedback.

We will use your communications with us and the feedback you may provide in order to manage our relationship with you and to improve our services and experiences for all parties we work with to deliver our business.

To personalise and improve your business experience

We may use your personal data in order to develop our services. *For example, if you inform us about your role in the industry and have consented to receive marketing communications we will be able to send you information relevant to your part of the delivery of our business. (via email or our website).*

To share news and information that may be of interest to you

If you have given us your consent to receive marketing material, we may send you marketing communications. *For example, distribution of our Intelligence products.*

Please note that we do not share your contact details or other personal data with other companies for marketing purposes, unless we have first obtained your written consent to do so.

If you do not want to receive marketing communications / notifications from us, you can simply tell us so by contacting us: **privacy@ambrey.com / +44 (0) 203 503 0330.**

You can also choose to opt out from receiving marketing communications at any time.

To improve services, fulfil our administrative purposes, protect our business interests

The business purposes for which we will use your information include, but are not limited to, accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development of our products and services.

Compliance purposes

We may also use your personal data for the following:

- A legal obligation which requires processing by law or in order for us to be able to establish, enforce, or defend against legal claims.
- Insurance reporting and management procedures
- Audit and due diligence purposes

5. Your rights

You have legal rights under EU data protection legislation.

Below is a summary, to read the full regulation refer to the **General Data Protection Regulation (Regulation (EU) 2016/679)** <https://gdpr-info.eu/> sections 3–5:

- **Access rights.** You are entitled to be informed as to whether Ambrey is processing personal data about you. If we are, you are entitled to information regarding, among

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other things, which personal data we are processing, the purposes of the processing, which external recipients have access to your personal data, and how long we save your personal data.

- **Data portability rights.** You have a right to receive a copy of the personal data which you have provided to Ambrey, in a structured, commonly used, and machine-readable format. You also have the right to require that Ambrey transfers this personal data to another controller of personal data. The right to data portability applies to personal data which is processed in an automated manner and which is based on your consent or on an agreement to which you are a party.
- **Correction of wrong or incomplete data.** You have a right to require that Ambrey corrects erroneous or incomplete information about you.
- **Deletion of data.** You have a right to require Ambrey to delete your personal data under certain circumstances, for example where the personal data is no longer necessary for the purpose for which we collected it.
- **Right to object to processing of data.** You have the right, under certain circumstances, to object to Ambrey's processing of your personal data.
- **Right to object to direct marketing.** You have the right at any time to object to Ambrey processing your personal data for direct marketing purposes. If you object to such processing, Ambrey must discontinue all direct marketing to you without undue delay.
- **Right to restrict the processing of personal data.** You have the right to require Ambrey to restrict its processing of your personal data in certain circumstances. For example, if you have denied that your personal data is correct, you can request a restriction on the processing during a period of time which allows Ambrey to verify whether the personal data is correct.
- **Right to withdraw consent for use of data.** If our processing is based on your consent, you have the right to withdraw your consent to our processing of your personal data at any time. Such withdrawal does not affect the lawfulness of our processing based on your consent before its withdrawal.
- **Complaints.** If you have any complaints regarding Ambrey's processing of your personal data, you are entitled to file such complaints with the Data Protection Authorities (Information Commissioners Office – ICO - <https://ico.org.uk/>)

6. Security of your personal data

- Ambrey are committed to taking appropriate technical and management measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data that we hold / process about you.
- When you provide your personal data to us, this information is held on a secure private cloud and associated financial software.
- As described in this Privacy Policy, we may disclose your personal data to third parties when delivering our business services. Any third party Ambrey discloses your personal data to has been issued a compliance statement requesting / requiring the data is managed in line with the EU Regulation.
- The information that you provide to us will be held on hosted systems not owned by us, which are located in premises of an appointed third party within the EU.

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- We may also allow access to your information by our employees who act as data processors on our behalf for the purposes described in this Privacy Policy or for other purposes for which your consent or compliance has been granted.

7. Retention of personal data

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Policy.

We may also save your personal data for a longer period of time where necessary in order to fulfil the following:

- A legal obligation which requires processing by law or in order for us to be able to establish, enforce, or defend against legal claims.
- Insurance reporting and management procedures
- Audit and due diligence purposes

8. Website

Ambrey use Google Analytics and our website collects visitor data to analyse traffic on our site. This information helps us understand your interests and helps us improve our website.

When you visit our site www.ambrey.com, the pages that you look at, and a short text file called a cookie, are downloaded to your computer. A cookie is used to store small amounts of information. This information is collected for traffic analysis only. The cookie does not contain personal details. Depending on the browser that you use, you can set your preferences to block/refuse cookies, and/ or notify you before they are placed.

We do not use your data for market research or advertising purposes.

9. Storing data

All data is kept securely on Ambrey local and cloud platforms.

Our chosen IT suppliers follow our compliance policies regarding data processing at a minimum in the following IT environments, where applicable:

- Live
- Development
- Test
- All Ambrey staff follow strict security policies for system access and data storing
- All Ambrey stakeholders have the relevant access and visibility of our systems
- Our chosen suppliers have controlled access to maintain and upgrade our systems to ensure security and maintenance patches are regularly applied. As required, Ambrey share the minimum personal data with these stakeholders in order for them to support and assist us to provide the Ambrey Group with an effective and secure IT Service.
- Ambrey ensure the IT stakeholders give their employees appropriate access to our systems and follow strict access termination procedures if required.
- Ambrey servers are located within the EU and abide by EU Data processing and GDPR regulations
- Any data deemed to require removal or following request to withdraw consent from Ambrey systems will be logged in the company **Data Management Review Matrix**

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- In the instance that data recovery from our encrypted backups is ever required it will be cross-referenced with the **Data Management Review Matrix** to ensure any removal requests / withdrawal of consents are actioned appropriately and immediately purged as required upon restoration.

10. Transfers of personal data outside of the EU/EEA

Your personal data will be processed within our global IT systems and by staff primarily within the EU/EEA.

Ambrey's third party supply chain will be required to hold data for specific processes for a specific timeframe in and outside the EU/EEA. For example, flag states, medical management response teams, commercial client entities, shipping agents.

11. Updates to our Privacy Policy

We will make changes to this Privacy Policy as required. This policy has been written to the guidelines of the new European data protection legislation which will be in force from 25 May 2018 (the "General Data Protection Regulation").

Ambrey commit to:

- Routinely reviewing all policy and procedure every quarter.
- Publishing revisions to this Privacy Policy on the company website www.ambrey.com

If you have questions in relation to your personal data, how it is stored or would like to submit a request for an extract from the register, data portability, correction, deletion, objection, restriction or withdrawal of consent, contact us at privacy@ambrey.com

Please refer to Appendix 1 Compliance Statement.