

**Humber Seafarers' Service Limited**  
**And**  
**Humber Seafarers' Service Trading Limited**  
**GDPR Policy**  
**(also known as Privacy Notice or Privacy Statement)**

The policy of the Humber Seafarers' Service Limited and the Humber Seafarers' Service Trading Limited is hereinafter referred to as HSSL and HSSTL.

**Opening Statement:**

This policy as per GDPR requirements assists individuals giving control over how their personal data will be used. Therefore, how and when individuals can exercise such control as stated within this policy.

This Privacy policy language is deemed to be clear and easy to understand by all who have no knowledge of privacy law.

**Data Protection Officer (DPO):**

**HSSL and HSSTL - DATA PROTECTION OFFICER (DPO)**

Ros Dezelsky,

Lockside Road, Immingham Docks, Immingham DN40 2NN.

Tel +44 (0) 07954 381743

Tel +44 (0)1469 574 195

Lockside Road, Immingham Docks, Immingham DN40 2NN.

Email: [ros.humberseafarers@gmail.com](mailto:ros.humberseafarers@gmail.com)

**Duties to include:**

- Assisting in monitoring internal compliance, inform and advise on data protection obligations, provide advice regarding Data Protection and act as a contact point for data subjects and the supervisory authority.

**For the sake of this policy "personal data" shall be defined as:**

- Any information relating to an identified or identifiable natural person.
- An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

**Humber Seafarers' Service Limited**  
**And**  
**Humber Seafarers' Service Trading Limited**  
**GDPR Policy**  
**(also known as Privacy Notice or Privacy Statement)**

**Background:**

On the 25<sup>th</sup> May 2018, the General Data Protection Regulation (GDPR) came into force and superseded the existing UK Data Protection Act 1998. Updated legislation expanded the rights of individuals to control how their personal data is collected and processed, and places a range of new obligations on our organisation to be more accountable for data protection.

**Key Elements:**

The following key elements are included in this GDPR Policy:

- 1) What kind of personal information about you do we process?
- 2) What is the source of your personal information?
- 3) What do we use your personal data for?
- 4) What are the legal grounds for our processing of your personal information (including when we share it with others)?
- 5) When do we share your personal information with other organisations?
- 6) How and when can you withdraw your consent?
- 7) Is your personal information transferred outside the UK or the EEA?
- 8) How do we share your information with credit reference agencies?
- 9) How do we share your information with Fraud Prevention Agencies?
- 10) What should you do if your personal information changes?
- 11) Do you have to provide your personal information to us?
- 12) Do we do any monitoring involving processing of your personal information?
- 13) What about other automated decision making?
- 14) For how long is your personal information retained by us?
- 15) What are your rights under data protection laws?
- 16) Exercising rights to this policy?
- 17) When consent for processing an individual's data is not required?

**1) What kind of personal data do we process?:**

- The personal data HSSL and HSSTL hold would only be in respect of employees and names and addresses from people who have sent donations.
- Employee information is held in electronic format for wages/pensions. This is backed up 'in the cloud' and the computer is password protected in a locked office when not in use.
- Any personnel information held by the company is by way of job application forms, employment notes, letters in respect of job offers, wages / pensions.
- This also includes a form which gives contact / medical information which may be needed in an emergency.
- Medical information is kept in separate files, in a locked cabinet to which only the manager has the key and again in a locked office when not occupied.

**Humber Seafarers' Service Limited**  
**And**  
**Humber Seafarers' Service Trading Limited**  
**GDPR Policy**  
**(also known as Privacy Notice or Privacy Statement)**

- Any information stored in respect of people who donate to HSSL is, at the most, name, address and telephone number as the centre automatically writes a letter of thanks / appreciation when items are donated.
- Letters of appreciation are recorded of the donation received and if of a financial nature they are recorded for accounts purposes. All kept in a locked back office.

**2) What is the source of your personal information?:**

- All personal information was given to us by each employee via CV and medical information forms required for employment and health and safety reasons.
- Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under HSSL and HSSTL GDPR policy.
- HSSL and HSSTL should not use personal data for any reason other than as stipulated in this privacy policy.

**3) What do we use personal data for?**

- Payroll of employees including pensions as necessary.
- Medical requirements and emergencies whilst working on site.
- Sponsors / donators contact details.
- Telephone numbers of employees are kept on file and in the Managers personal diary in case of urgent contact.

**4) What are the legal grounds for our processing of your personal information (including when we share it with others)?**

- Individuals associated with HSSL and HSSTL must be informed about the collection and use of their personal data ensuring the centre operates in a professional and transparent manner.
- They will be provided with information regarding why their personal data has been processed and for how long their personal information shall be retained.
- HSSL and HSSTL is legally required to keep medical records of employees as a duty of care in case of an accident or emergency.
- Personal records are also kept as required so as to correctly inform HMRC of pay and pension criteria ensuring all employees are paid as per UK legal requirements.

**5) When do we share your personal data with other organisations?**

- Unless legally required, HSSL and HSSTL will never share personal data with other organisations.
- HSSL and HSSTL would never share information with a third party unless a reference was asked for in which case the employee would have given their authority to request the reference or if there was any employment tribunals etc which would require legal details.

**Humber Seafarers' Service Limited**  
**And**  
**Humber Seafarers' Service Trading Limited**  
**GDPR Policy**  
**(also known as Privacy Notice or Privacy Statement)**

- \* HSSL and HSSTL must explain when an individual's personal data may be disclosed to third parties and the reason for doing so, as best as practically possible, links to the third party privacy policies can be forwarded.

**6) How and when can you withdraw your consent (right to erasure)?**

- GDPR introduces a right for individuals to have personal data erased.
- The right to erasure is also known as 'the right to be forgotten'.
- Individuals can make a request for erasure verbally, via email or in writing.
- HSSL and HSSTL will respond to such requests within a one month time period.

**7) Is your personal information transferred outside the UK or the EEA?**

- HSSL and HSSTL do not intend to transfer personal information outside of the UK or EEA.
- If personal data transfers take place outside the EEA the company DPO must inform individuals and specify mechanisms which will be used to protect the same (for instance the third party may have Privacy Shield certification).

**8) How do we share your information with credit reference agencies?**

- HSSL and HSSTL will never share individual's personal information with credit reference agencies.

**9) How do we share your information with Fraud Prevention Agencies?**

- Unless legally required HSSL and HSSTL will never share information with fraud prevention agencies.

**10) What should you do if your personal information changes?**

- Changes to personal information should be provided to the DPO as soon as practicably possible verbally, via email or in writing.
- Recognition of such changes given within 48 hours of receipt.
- Changes to personal data carried out via the DPO and the individual requesting the change notified within one month from the original request date the changes have been made.

**Humber Seafarers' Service Limited**  
**And**  
**Humber Seafarers' Service Trading Limited**  
**GDPR Policy**  
**(also known as Privacy Notice or Privacy Statement)**

**11) Do you have to provide your personal information to us?**

- Individuals have the right to request the restriction or suppression of their personal data to HSSL and HSSTL although this is not an absolute right and only applies in certain circumstances.
- When processing is restricted, personal data is permitted to be stored, but not used.
- Any individual can make a request for restriction verbally, via email or in writing.
- There is a one month time period HSSL and HSSTL have to respond to a request.

**12) Do we do any monitoring of including processing of personal information?**

- HSSL and HSSTL processes personal information for employment purposes only.

**13) What about other automated decision making?**

- There is no automated decision making processes in place at HSSL or the HSSTL.

**14) For how long is personal information retained?**

- All personal information is kept in a locked cabinet or stored electronically whilst the employee is still employed for a minimum time period of six years.

**15) What are your rights under data protection laws?**

Under the GDPR, individuals have the following rights:

- Requesting access to, rectification of or, deletion of their personal data.
- Requesting their personal data to be transferred to another person.
- Right to complain to a supervisory authority.

**16) How do individuals exercise such rights of this policy?**

- Any access, rectification, deletion, request for transfer, complaint or rights to object to this policy regarding personal data must be made verbally, via email or in writing to the HSSL and HSSTL, Data Protection Officer (DPO).
- Recognition of the request must be returned within 48 hours of the request with feedback given within one month from the original request date stating the changes made or the reason for why the request could not be carried out.


**Humber Seafarers' Service Limited**  
**And**  
**Humber Seafarers' Service Trading Limited**  
**GDPR Policy**  
**(also known as Privacy Notice or Privacy Statement)**

17) Following purposes whereby consent for processing an individual's data is not required.

- A contract with an individual: e.g. to supply goods or services which the individual has requested or purchased from you on your website. This includes steps taken at the individual's request before entering into a contract. Note that the processing must be necessary.
- Compliance with a legal obligation: if you are required by common law or statute to process the data for a particular purpose, you can.
- Legitimate interests: if you are a private-sector organisation, you can process personal data without consent if you have a genuine and legitimate reason (including commercial benefit) whereby processing the data is necessary, unless this is outweighed by harm to the individual's rights and interests (i.e. the 'balancing test').
- Vital interests: you can process personal data if it is necessary to protect someone's life (this is not limited to the individual to whom the data relates).
- A public task: if you need to process personal data to carry out your official functions or a task in the public interest, and you have a legal basis for the processing under common law or statute, you can. This is usually only relevant to public authorities, but note that it can apply to any organisation that exercises official authority or carries out tasks in the public interest.

Further, note that prior consent to processing an individual's data will be required if none of the above five purposes apply.

Signature: \_\_\_\_\_



Mrs Ros Dezelsky

(Manageress and DPO of HSSL). (Director and DPO of HSSTL)

Dated: 11th of October 2018