

<b>Document Title</b>	Privacy Policy	
<b>Document Reference</b>	1.03.12.1	
<b>Version</b>	1.0.0.6	
<b>Issue Date</b>	1 <sup>st</sup> January 2024	
<b>Document Author</b>	John F Macleod	
<b>Document Approval</b>	Douglas Leask	
<b>Applicability</b>	All Company Operations	
<b>Pages</b>	10	

## PRIVACY POLICY

### INTRODUCTION

Welcome to the Leask Marine Ltd’s privacy policy. We respect the General Data Protection Regulations (GDPR) and this policy explains how we collect and treat any information you give us. You won’t find any complicated legal terms or long passages of unreadable text and we have no desire to trick you into agreeing to something you do not understand.

Leask Marine Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy policy describes how we collect and process your personal data during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

### CONTROLLER

Leask Marine is the controller and is responsible for your personal data (collectively referred to as Leask Marine Ltd, “we”, “us” or “our” in this privacy policy).

We have appointed an Information Security Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Information Security Manager using the details set out below.

### CONTACT DETAILS

Our full details are:

Leask Marine Ltd

Information Security Manager - John F Macleod – [info@leaskmarine.com](mailto:info@leaskmarine.com)

6 Crowness Road, Hatston Industrial Estate, Kirkwall, Orkney, KW15 1RG, UK

Tel: +44(0) 1856 874 725

[www.leaskmarine.com](http://www.leaskmarine.com)

Leask Marine is registered with the Information Commissioners Office that we do hold personal data and that we process personal information to enable us to provide a marine contracting services to our customers, maintain our accounts and records, promote our services and manage and support our staff. We also process personal information using CCTV system to monitor and collect visual images for the purpose of security and the prevention and detection of crime.

Our certification number ZA325665.



You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance

### **CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **THIRD PARTY LINKS**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. 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.

### **DATA PROTECTION PRINCIPLES**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.

This document is uncontrolled when printed

Page 2 of 10

PUBLIC

5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- 🕒 **Identity Data** includes first name, last name, and can include personal details where necessary
- 🕒 **Contact Data** includes business address, email address and telephone numbers
- 🕒 **Transaction Data** includes details of products and services you have purchased from us.
- 🕒 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- 🕒 **Profile Data** includes your username and passwords, purchases or orders made by you.
- 🕒 **Usage Data** includes information about how you use our website, products and services.
- 🕒 **Marketing and Communications Data** includes your preferences in receiving marketing or general information from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website or grouped usage feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If we collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) it is specifically for business project needs. We only collect any information about criminal convictions and offences if it is a requirement for working on specific projects of a sensitive nature that may be affected, or where this information is required by law to be declared.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including through:

- 🕒 **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - 🕒 Enquire about services offered by the Company;

- 🔗 Enquire about being a service supplier to the Company
- 🔗 Enquire about job opportunities;
- 🔗 Enquire about training;
- 🔗 Onsite during visits;
- 🔗 Subscribe to our service or publications;
- 🔗 Request marketing to be sent to you;
- 🔗 Enter a competition, promotion or survey; or
- 🔗 Give us some feedback.

**Automated technologies or interactions.** As you interact with our Company, we may automatically collect Technical Data about you browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy (IMS 13.13), which is available online on our Company website or is available on request.

**HOW WE WILL USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. Where we need to perform the contract, we are about to enter into with you, or have entered into with you.
2. Where we need to comply with a legal, or regulatory obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To register you as a new employee or sub-contractor	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver an order	(a) Identity (b) Contact (c) Marketing and Communications	Performance of a contract with you

To process and deliver supply chain activities	(a) Identity (b) Contact (c) Marketing and Communications	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how we use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how we use our products/services, to develop them and grow our business)
To administer and protect our business and our media network systems (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website and media content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how we use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company Leask Marine Ltd for marketing purposes.

### **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by Contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

### **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use please see our cookies policy (IMS 13.13) which is available online on our Company website or is available on request.

### **CHANGE OF PURPOSE**



We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in above.

-  Internal Third Parties as set out in the Glossary.
-  External Third Parties as set out in the Glossary.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA).

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **DATA RETENTION**

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

Your legal rights

Under certain circumstances, by law you have rights under data protection laws in relation to your personal data, as follows:

- Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- 🕒 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- 🕒 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- 🕒 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 🕒 **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data in the following scenarios: a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 🕒 **Request the transfer** of your personal data to you or a third party. We will provide you or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the Company Information Security Manager: John F Macleod in writing at 6 Crowness Road, Hatston Industrial Estate, Kirkwall, Orkney, KW15 1RG, UK.

#### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

#### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



## RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Company Information Security Manager: John F Macleod. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

#### Internal Third Parties

Other companies in the Leask Marine Group of Companies and who are based in the UK and provide Marine Contracting Services.

#### External Third Parties

##### Regulators, such as:

- British Assessment Bureau who we use for our ISO and SSIP Accreditation;
- The Association of Diving Contractors (ADC) as the industry body representing diving contractors working Inland /Inshore in the UK;
- Lloyd's Register EMEA, American Bureau of Shipping, RINA, DNV-GL service supplier's for in-water survey of ships and mobile offshore units on the Lloyds Register of Approved Service Supplier Database;
- Achilles UVDB. Achilles UVDB helps utility companies manage risk within their supply chain and comply with EU Procurement Legislation;
- Achilles First Point Assessment Database for suppliers to the Oil & Gas Industry for the provision of products and services. Achilles FPAL helps oil & gas companies manage risk within their supply chain;
- Achilles Repro Database for supplier management for Southern Europe and Latin America Utilities Industry for the provision of products and services;

- Constructionline & Acclaim database registers of contractors, consultants and material suppliers for the construction industry so our company aligns to industry and government standards;
- Cyber Essentials accreditation to protect all I.T. information

Hosting services, such as RM Computing Ltd and Orcadia Design Ltd providing the platforms for Information technology systems.

Customer feedback providers, if appointed for customer feedback and satisfaction surveys

Professional advisers including solicitors, bankers, auditors, HR services, IT services and insurers based in the UK who provide banking, legal, H.R., I.T., insurance, and accounting services.

HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.



Signed:

Name: Douglas Leask, Managing Director

Date: 1<sup>st</sup> January 2024