



SIRM UK Marine Ltd.

Privacy Policy

In this policy, the words 'SIRM UK', 'we', 'us' or 'our' refer to SIRM UK Marine Ltd. A Company registered in England and Wales with a registered address of 69-71 Haltwhistle Road, South Woodham Ferrers, Essex CM3 5ZA. Registered Company Number 10167736.

SIRM UK is committed to protecting and preserving the privacy of our customers, in this policy we outline what personal data we hold and how we collect, store and process it in a clear and open way. This Privacy Policy applies to all Companies that are part of the SIRM group of companies, including SIRM SpA and SIRM UK Marine Ltd.

Any questions regarding this Policy and our privacy practices should be sent by email to sales@sirm.co.uk or by writing to the Data Protection Officer; D.P.O. SIRM UK, 69-71 Haltwhistle Road, South Woodham Ferrers, Essex CM3 5ZA. Alternatively, you can telephone 01245 933340.

Who are we?

We are SIRM UK Marine Ltd, a UK limited company that specialises in the provision of marine electronics for navigation and communication purposes for a variety of vessels. We also provide technical installation, maintenance and project services, and airtime to maritime vessels.

What is personal data?

Personal data is information about you that can help us identify you, such as your name, address, phone number or email address.

What personal data do we collect about you?

We obtain information about you when you use our website, for example, when you contact us about services, if you directly give us any information via contracts or forms, if you make a booking for a radio survey or service intervention or sign up to receive email newsletters. The nature and the type of personal data we collect will depend on why you are giving it to us.

We collect personal data about you...

- When you make a Service or Survey booking online or by telephone.

At the time of making a booking for a service intervention, radio survey, sales quotation, over the telephone or face-to-face, your details are entered into our MBIS system (Marine Business Information System). The access to this system is password protected and restricted to SIRM UK staff and contained within a protected network. We collect information such as your name, contact details, email, billing address and vessel particulars. If you opt to pay via credit/ debit card, your bank/credit card details are transmitted via a secure and encrypted link into our payment gateway provider.



- When you interact with us on our social media pages (such as Facebook and Linked in).
- When you sign up for any of our newsletters.

We collect information such as your name and email address

- When you voluntarily provide us with your personal data whilst requesting a quote, completing surveys, or providing feedback.

We collect information such as your name, email address, postal address and any additional data you provide to us by sending us a message through our website, social media or information provided to us when you communicate with us electronically for any reason. If you contact us, we may keep a record of your email and other correspondence.

Information that you provide to us as a result of filling in forms on our website, such as registering for information or making a service request.

What do we use your personal data for?

- When processing your personal data, we will only do so in relation to specific purposes and only after giving careful consideration to your privacy rights.
- We will process the personal data that you provide to us in the following ways for the purpose of (and on the basis of) our performance of our contractual obligations to you:
- To provide our services to you: for example, to issue sales literature, certification, survey paperwork or carry out or arrange a service request on vessel;
- To communicate with you and manage our relationship with you: for example, add you to appropriate email distribution lists and contact you directly about matters that relate to your account, vessel, quote or service intervention.;
- To improve our services, fulfil our administrative purposes and protect our business interests: for example: accounting, billing and legal purposes.
- To respond to any queries that you ask us;
- Helping us identify and fix defects or errors in our sites, system or services;

We will process the personal data that you provide to us in the following ways in order to comply with our legal obligations:

- To retain and process records when you make a service request, equipment order or other booking with us;
- For the purposes of identifying and preventing fraud; and
- To comply with statutory or regulatory requirements, such as reporting requirements Health and Safety Law.



We will only retain such profiles for as long as it is appropriate to do so and will always delete this data responsibly.

Marketing Communications

We do not sell, trade or otherwise transfer information to third-parties other than those trusted to assist us in conducting our business or servicing you, so long as those parties agree to keep this information confidential.

Who do we share your personal data with?

Except where we use third party services to collect information, when you are asked for personal data by us, you are sharing that information with us alone, unless we specifically state otherwise below.

We may also provide your personal data to third parties who may process your data as part of the services they carry out on our behalf. In order to provide you with the services that you have requested from us, the following third parties may also need to process your personal data:

- Third party product and service providers who we engage on your behalf to provide the products or the services that you have agreed to purchase (such as an overseas service company.)
- Any statutory, governmental or regulatory body that requests the personal data and that we are obliged (by law or by regulation) to provide;

We do not sell or rent your personal data to anyone, we will never provide your personal data to another company or charity for their marketing purposes without your explicit consent.

How do we protect your personal data?

SIRM UK is committed to keeping your personal data secure. Steps we take in order to do this include the use of technical controls (such as encryption and network protection), limiting the number of people working for us who have access to your data.

Where we use external suppliers to process your personal data, we put measures in place to make sure that they treat it as carefully as we would and use it only in accordance with the instructions that we give to them.

Retention of your personal data:

We will only retain your personal data for as long as we need to keep it. In considering how long to retain your data we will always take into account factors such as any ongoing obligations we have to you, the nature of our relationship with you, legal requirements (e.g. in relation to legal statutory retention periods) and contractual requirements. We will not keep your data indefinitely and will always dispose of it carefully when it is no longer necessary for us to retain it.



Your rights

You have a right to request access to the personal data that we hold about you. Such a request is a written request made by or on behalf of an individual for the information which he or she is entitled to ask for. On request, SIRM UK will:

- list what information is held on an individual (the right to be informed);
- provide all information held on an individual (the right of access);
- amend the information held on an individual (the right to rectification);
- delete information held on an individual (the right to erasure);
- suppress processing of information held on an individual (the right to restrict processing);
- provide a file containing the information held on an individual, in a commonly used format such as comma separated value (.csv), Excel (.xls), or plain text (.txt) (the right to data portability);
- respond to objections regarding information held on an individual, and act as appropriate (the right to object).

Requests for access should be sent to the following address; D.P.O SIRM UK, 69-71 Haltwhistle Road, South Woodham Ferrers, Chelmsford Essex CM3 5ZA. SIRM UK will respond to access requests within a month of the request being received. A refusal or charge will be made for requests that are clearly unfounded or excessive. If a request is refused, the individual will be told why and that they have the right to complain to the supervisory authority and to a judicial remedy.

Regarding the right not to be subject to automated decision-making including profiling, SIRM UK does not use any automated decision-making or profiling systems.

Contact information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the SIRM UK D.P.O. 69-71 Haltwhistle Road, South Woodham Ferrers, Chelmsford Essex CM3 5ZA

If you are not satisfied, you have the right to lodge a complaint with the Information Commissioner's Office. Further information on how to do this is available on the ICO website.

Changing this policy

We may make changes to this policy from time to time. If we make any significant changes to this policy that impacts the way in which your personal data is treated, we will post the changes on this page or, where we feel that the changes are really significant, we may contact you directly. Changes will apply from the time we post them (either here on our website or when we contact you). This policy was last changed on 24th May 2018.

Author	Scott Gibson – Head of Marine	Technical Sign Off	Terry Birch – Head of Engineering
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