

WEBSITE LEGAL, PRIVACY & MLC COMPLIANCE POLICY

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Legal entity	Andco Yachts Ltd
Trading name	The Crew Guy
Company number	17439287
Registered office	166 Banks Road, West Kirby, Wirral, CH48 0RH, United Kingdom
Email	guy@thecrewguy.com
Telephone	+44 7488 583902
Website	www.thecrewguy.com
Effective date	30 September 2026

1. About this document

This document explains how Andco Yachts Ltd, trading as The Crew Guy, operates its yacht crew recruitment and placement service, how candidate personal information is handled, and the standards that apply when seafarers are recruited or placed through us.

The Crew Guy is a recruitment and placement service. Unless expressly agreed otherwise in writing, we are not the seafarer's employer and are not a party to the Seafarer's Employment Agreement (SEA).

2. Candidate Terms and Conditions

By registering with The Crew Guy, submitting a CV or other recruitment information, or asking us to represent you for a vacancy, you agree that we may use your information for legitimate recruitment and placement purposes in accordance with this document.

We will only submit a candidate for a genuine vacancy or opportunity and will make reasonable efforts to ensure the candidate is aware of the vessel, employer or opportunity before their details are submitted.

Candidate information and accuracy

- Candidates must provide information that is accurate and complete to the best of their knowledge, including employment history, sea time, qualifications and certification.
- We may request evidence of identity, qualifications, STCW certification, ENG1 or equivalent medical certification, Certificate of Competency where applicable, sea service and other role-specific documentation.
- We may interview candidates, take professional references and review relevant publicly available professional information where reasonably necessary for recruitment and vetting.
- Where contacting a referee could affect a candidate's current employment, we will obtain the candidate's permission before contacting that referee.

No candidate recruitment or placement fees

The Crew Guy does not charge seafarers, directly or indirectly, any fee or other charge for recruitment, placement or obtaining employment. This reflects MLC Standard A1.4.5(b). The limited costs that the MLC permits to remain the seafarer's responsibility are kept separate from recruitment fees; visa costs are borne by the shipowner where required by the MLC.

No blacklisting

The Crew Guy does not use any means, mechanism or list intended to prevent or deter a seafarer from gaining employment for which they are qualified. This reflects MLC Standard A1.4.5(a). Recruitment decisions are based on genuine role requirements, qualifications, experience, suitability and lawful employment requirements.

3. Seafarers' Employment Agreements (SEA)

For an MLC-applicable placement, The Crew Guy will take reasonable steps to ensure that the vessel or employer provides the candidate with a legally enforceable SEA before embarkation and that the SEA arrangements comply with MLC Regulation 2.1, Standard A2.1 and applicable MCA requirements and guidance, including MGN 477 (M) Amendment 5.

The candidate must be given sufficient time and opportunity to examine the SEA before signing, understand their rights and duties, and seek advice on its terms if they wish. The agreement must be entered into freely and the seafarer should receive and retain a copy of the signed agreement.

The Crew Guy does not normally draft, issue or sign the SEA. Responsibility for the employment agreement remains with the relevant shipowner/employer, unless The Crew Guy has specific written authority to act on the shipowner's behalf.

4. MLC Shipowner Checks and Protection Against Stranding

As far as practicable, The Crew Guy seeks to satisfy itself that the shipowner has the means to protect seafarers from being stranded in a foreign port, consistent with MLC Standard A1.4.5(c)(iv).

Where relevant to the placement, the Client is expected to maintain the financial security required by the MLC for repatriation under Regulation 2.5 and to meet applicable obligations concerning medical care and shipowners' liability under Regulations 4.1 and 4.2.

5. The Crew Guy System of Protection (SoP)

The Crew Guy maintains a financial System of Protection (SoP), by insurance or other equivalent appropriate measure, in connection with its recruitment and placement activities. The purpose of the SoP is to compensate qualifying seafarers for monetary loss where the recruitment and placement service or relevant shipowner fails to meet obligations covered by the applicable MLC recruitment and placement requirements.

Before or during the engagement process, placed seafarers will be informed about the SoP in place and their rights under it, including how to obtain the relevant insurer/security-provider and claims information. The Crew Guy will not obstruct a seafarer from exercising rights under the SoP.

PRIVACY & DATA PROTECTION

6. Privacy Notice - UK GDPR and Data Protection

Andco Yachts Ltd, trading as The Crew Guy, is the data controller for personal information processed for its recruitment and placement activities. We process personal information in accordance with applicable UK data-protection law, including the UK GDPR and Data Protection Act 2018.

Information we may collect

- Identity and contact details, including name, email address, telephone number, nationality and location information relevant to a role.
- CV information, employment history, sea service, education, training, professional skills and qualifications.
- Copies or details of certificates and documents relevant to yacht employment, such as STCW, ENG1 or equivalent medical certification, CoCs and visas/right-to-work information where appropriate.
- References and information supplied by referees, former employers, captains or heads of department.
- Recruitment communications, interview notes, vacancy submissions, offer and placement records.
- Relevant publicly available professional information, including LinkedIn and public social-media information where proportionate to recruitment vetting.
- Complaint, compliance and audit records where necessary.

Why we use personal information and lawful bases

We use candidate information to assess suitability for vacancies, communicate about opportunities, submit candidates to prospective employers with their knowledge, conduct proportionate vetting and reference checks, administer placements, maintain required recruitment records, respond to complaints and comply with legal or regulatory obligations. Depending on the activity, our lawful basis may include taking steps at the candidate's request in connection with a prospective contract, legitimate interests in operating a safe and effective recruitment service, compliance with legal obligations, and consent where consent is specifically required.

Sharing information

Candidate information may be shared with yacht owners, captains, managers, management companies or other authorised prospective employers in connection with a genuine vacancy. We do not sell candidate personal information and do not circulate CVs speculatively in bulk. Information may also be shared with professional advisers, service providers, insurers or authorities where necessary and lawful.

International transfers

Yacht recruitment is international. A prospective employer or vessel may be located outside the United Kingdom. Where personal information is transferred internationally, The Crew Guy will take reasonable steps to use an appropriate lawful transfer mechanism or other applicable safeguard where required by UK data-protection law.

Retention and security

Personal information is retained only for as long as reasonably necessary for the recruitment purpose, ongoing candidate relationship, regulatory record-keeping, complaints, audit, insurance or legal requirements. Particularly intrusive vetting information will not be retained longer than necessary. Retention periods are reviewed and information is securely deleted or anonymised when it is no longer required. Appropriate organisational and technical measures are used to protect information against unauthorised access, loss, alteration or disclosure.

Your data-protection rights

- You may ask for access to personal information held about you.
- You may ask us to correct inaccurate or incomplete information.
- Where applicable, you may request erasure, restriction or portability of your information.
- Where processing is based on legitimate interests, you may have the right to object to that processing.
- Where processing relies on consent, you may withdraw that consent at any time without affecting processing already lawfully carried out.
- You may complain to the UK Information Commissioner's Office if you believe your data-protection rights have been infringed.

To exercise a privacy right or ask a data-protection question: guy@thecrewguy.com

MLC COMPLAINTS PROCEDURE

7. Purpose and scope

The Crew Guy examines and responds to complaints concerning its seafarer recruitment and placement activities. This procedure is designed to support MLC Standard A1.4.5(c)(v) and current MCA guidance. It applies to candidates, seafarers, clients and other persons directly affected by our recruitment and placement service.

Complaints about onboard employment conditions may also need to be raised through the vessel's onboard complaints procedure and/or the appropriate MLC onshore complaints route.

8. Our complaints principles

Complaints are taken seriously, investigated impartially and treated as confidentially as reasonably possible. A person will not be disadvantaged by The Crew Guy merely because they raise a genuine complaint in good faith. We will distinguish established facts from allegations or opinions and maintain an appropriate investigation record.

9. How to make a complaint

A complaint should preferably be made in writing to guy@thecrewguy.com. Please provide, where possible, your name and contact details, the candidate/seafarer and vessel concerned, a clear description of the issue, relevant dates, people involved, supporting emails or documents, and the outcome you are seeking. A complaint may still be considered where some information is unavailable, and an anonymous complaint may be reviewed where sufficient information is provided.

10. What happens after a complaint is received

The complaint will be recorded in The Crew Guy Complaints Register. We aim to acknowledge receipt as soon as reasonably practicable, normally within 2 working days. We will assess whether urgent action is required to protect a seafarer, preserve evidence, stop a placement or address an immediate compliance concern.

The investigation may include review of the vacancy brief, candidate file, verification records, references, submissions, offer/SEA-related records, SoP information and relevant communications, together with proportionate enquiries of the people involved.

11. Response and corrective action

We aim to provide a substantive written response within 10 working days of receiving sufficient information to investigate. If the matter is complex or requires third-party information, we will provide an update and a revised target date.

Corrective action may include correcting records, supplying missing information, repeating or strengthening verification, suspending or stopping a placement, addressing a client instruction that conflicts with MLC or legal requirements, notifying the SoP provider where relevant, and updating procedures or controls.

12. Unresolved MLC complaints and external escalation

If a complaint concerning The Crew Guy's recruitment and placement activities cannot be resolved, The Crew Guy will advise the competent authority as required by MLC Standard A1.4.5(c)(v) and applicable UK arrangements.

A seafarer may also use applicable onboard and onshore MLC complaint procedures. Current MCA guidance provides an onshore MLC complaints route via the Maritime and Coastguard Agency. Current contact and process information should be checked on GOV.UK before making an external complaint.

13. SoP complaints and claims

Where a complaint concerns monetary loss potentially arising from a failure of the recruitment and placement service or relevant shipowner to meet obligations to the seafarer, The Crew Guy will review the applicable System of Protection and provide the seafarer with the relevant insurer/security-provider and claims information.

14. Confidentiality, records and non-retaliation

Complaint information will be shared only with persons who reasonably need it for investigation, legal compliance, insurance or resolution. Complaint records and outcomes will be retained as appropriate for audit, legal and regulatory purposes. The Crew Guy will not retaliate against a person for raising a genuine complaint in good faith.

15. MLC compliance statement

The Crew Guy's recruitment and placement procedures are designed around MLC Regulation 1.4 and Standard A1.4 and applicable UK requirements and MCA guidance. This includes no candidate recruitment fees, no blacklisting, appropriate candidate and qualification checks, SEA safeguards, protection against stranding as far as practicable, a financial System of Protection, complaint handling and maintenance of recruitment and placement records.

MLC obligations may vary according to vessel flag, vessel status and the circumstances of a particular placement. The Crew Guy will apply the relevant legal and flag-State requirements to each placement where applicable.

16. Updates and contact

This policy may be updated to reflect changes in law, MCA guidance, MLC requirements, business processes or the services provided by The Crew Guy. The current version published by The Crew Guy should be used.

Contact: Andco Yachts Ltd trading as The Crew Guy
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