



Data Protection & Safe Storage Policy

Introduction

Celox Yachting are required to maintain certain personal data about living individuals for the purposes of satisfying operational and legal obligations

We recognise the importance of the correct and lawful treatment of personal data; it maintains confidence in the organisation and provides for successful operations.

The types of personal data that Celox Yachting may require include information about current, past, and prospective employees; candidates, clients, vessels, and others with whom it communicates. This personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 2018.

Celox Yachting fully endorses and adheres to the seven principles of the Data Protection Act. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for Celox Yachting must adhere to these principles

Celox Yachting Designated Data Controller

Celox Yachting Compliance Team are responsible for ensuring compliance with the Data Protection Act and implementation of this Policy on behalf Celox Yachting.

Status of the Policy

This policy has been approved by the Director and any breach will be taken seriously and may result in formal action

Any individual who considers that the policy has not been followed in respect of personal data about themselves or others should raise the matter with the Compliance Team.

Subject Access

All individuals who are the subject of personal data held by Celox Yachting are entitled to:

- Ask what information Celox Yachting holds about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed what Celox Yachting is doing to comply with its obligations under the 2018 Data Protection Act

Individuals Responsibilities

All individuals are responsible for:

- Checking that any personal data that they provide to Celox Yachting is accurate and up to date
- Informing Celox Yachting of any changes to information which they have provided, eg. changes of circumstance
- Checking any information that Celox Yachting may send out from time to time, giving details of information that is being kept and processed
- If, as part of their responsibilities, employees collect information about other individuals they must comply with this Policy; the Data Protection Act 2018 and Quality Management Operating System (QMS)



Data Security

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party
- Personal and Confidential information is disposed of via secure methods

Rights to Access Information

Employees and other subjects of personal data held by Celox Yachting have the right to access any personal data that is being kept about them on computer. This right is subject to certain exemptions which are set out in the Data Protection Act. Any person who wishes to exercise this right should make the request in writing to Celox Yachting Compliance Team. Celox Yachting reserves the right to charge the maximum fee payable for each subject access request. If personal details are inaccurate, they can be amended upon request.

Celox Yachting aims to comply with requests for access to personal information as quickly as possible but will ensure that it is provided within 10 working days of receipt of a written request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request

Publication of Celox Yachting Information

Information that is already in the public domain is exempt from the 2018 Act. This would include, for example, information on staff contained within externally circulated publications. Any individual who has good reason for wishing details in publications to remain confidential should contact Celox Yachting Compliance Team

Subject Consent

The need to process data for normal purposes has been communicated to all data subjects. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained. Processing may be necessary to operate Celox Yachting policies, such as health and safety and equal opportunities

Retention of Data

Celox Yachting will keep some forms of information for longer than others. All staff are responsible for ensuring that information is not kept for longer than necessary.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

Policy review date: 15th September 2024

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of Celox Yachting senior management to see that all relevant employees receive notice. Written notice and/or training will be considered.

Additional Information

Any additional information or clarification regarding this policy can be obtained by contacting the Compliance Team. In the unlikely event where you are unhappy with any decision made, you should use the Company's formal Complaints Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.