

1. INTRODUCTION

This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulations (GDPR) which is EU wide and far more extensive, seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.

DiveCo Marine Ltd (DiveCo) is pleased to provide the following GDPR information:

2. WHO WE ARE

Diveco Marine Ltd is marine civil engineering and commercial diving company that operates in the United Kingdom. Our offices are based in Upnor, Kent.

3. PERSONAL DATA

Diveco uses the information collected from you to provide information on our personnel to our clients. In making initial contact you consent to DiveCo maintaining a dialogue with you until you either opt out (which you can do at any stage) or we decide to cease using your information. DiveCo also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Diveco will be acting on the instruction of its client and will work hard to ensure that the client is fully GDPR compliant.

As a company pursuing marine civil engineering and commercial diving activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests are:

- Training certification
- Medical information
- Relevant job experience
- Permission to work in the U.K
- CTC clearance

We will never process your data where these interests are overridden by your own interests.

Some personal data may be collected about you from the C.V.s that you submit, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally-identifying information like Internet Protocol (IP) addresses. DiveCo may from time to time use such information to identify its visitors. DiveCo may also collect statistics about the behaviour of visitors to its website.

The sort of information we hold includes your application form and references (if supplied), your contract of employment/contract for services and any amendments to it; correspondence with or about you, for example letters to you about a pay rise or, at your request,

a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

You may be referred to in company documents and records that are produced by you or your colleagues in the course of carrying out your duties and the business of the company. You should refer to our Data Protection Policy that was forwarded to you and is also available on our website or in paper format from DiveCo Marine Ltd, Marine House, Upnor Road, Lower Upnor, Rochester, Kent, ME2 4UY.

Much of the information we hold will have been provided by you, but some may come from other sources, such as referees.

DiveCo's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WordPress.org uses cookies to help DiveCo identify and track visitors and their website access preferences. DiveCo website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using DiveCo website.

DiveCo will only collect the information needed so that it can contact you regarding work opportunities, we do not sell or broker your data, or pass it on the 3rd parties without your prior permission.

4. LEGAL BASIS FOR PROCESSING ANY PERSONAL DATA

To meet DiveCo contractual obligations to clients.

5. LEGITIMATE INTERESTS PURSUED BY DIVECO AND/OR ITS CLIENTS

To promote the services offered by DiveCo and/or to market the services and/or products offered by DiveCo's existing clients

6. CONSENT

Through agreeing to this privacy notice you are consenting to DiveCo processing your personal data for the purposes outlined.

If you have any concerns as to how your data is processed or wish to withdraw consent, you may do so at any time by emailing our nominated Data Processor at Julie.broad@DiveCo.co.uk, or in writing to Mrs. J. Broad, DiveCo Marine Ltd, Marine House, Upnor Road, Lower Upnor, Rochester, Kent ME2 4UY, or by phoning 0044 (0) 1634 566560.

7. DISCLOSURE

DiveCo Marine may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. DiveCo requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. DiveCo do not broker or pass on information gained from your engagement with the company without your consent. However, DiveCo may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The company may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of DiveCo, its clients and/or the wider community.

8. RETENTION POLICY

DiveCo will process personal data during the duration of any contract and will continue to store only the personal data needed for six years after the contract has expired to meet any legal obligations. After six years any personal data not needed will be deleted.

9. DATA STORAGE

Data is held in the United Kingdom using different (multiple) servers. DiveCo does not store personal data outside the EEA.

10. YOUR RIGHTS AS A DATA SUBJECT

At any point whilst DiveCo is in possession of or processing your personal data, all data subjects, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

In the event that DiveCo refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

DiveCo Marine, at your request, can confirm what information it hold about you and how it is processed:

You can request the following information:

- Identity and the contact details of the person or organisation (DiveCo) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.

- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of DiveCo or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what Personal data is held, identification will be required

DiveCo will accept the following forms of ID when information on your personal data is requested:

A copy of your HSE Dive Qualifications, driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If DiveCo is dissatisfied with the quality, further information may be sought before personal data can be released.

11. COMPLAINTS

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the General Data Protection Regulations 2018 (GDPR) or Data Protection Act 1998 (DPA) with regard to your personal data. Their contact information is:

ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, Telephone 0303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>



David Wood
Managing Director
DiveCo Marine Ltd
30th July 2020