



Document: Privacy Notice and Consent

Version: 1.0

Date: 10th July 2020

Author: Alison Gill, Director, Intelligent Ocean Ltd.

Privacy Statement Summary:

Who will use my data?	Intelligent Ocean Ltd.
What for?	We will store and process your data in order to allow us to provide our consultancy, training services and advice services to you. We may also send you details of other services or additional products that we develop that we think you will be interested in. We will also ask you if you would like to receive information from carefully selected third parties.
What will happen if I contact you?	If you contact us, we will use your information to send you the information you have requested and other information that we think you will be interested in. If you contact us for any other reason, we will use your details to respond to your enquiry, provide our services to you, and meet any legal obligations.
What data will be stored?	We will store your personal details in order to provide our consultancy and training services to you. We will store details of enquiries, services provided, and related financial information as required.
What data will be shared?	We will not share your data with any third parties other than as described here and as required to meet our obligations to you. We will only share your information with third parties for marketing purposes with your consent. We may share your information with any regulator or legal body that requests it.
How long?	Your data will be stored only for 7 years or as long as required to meet our statutory obligations, after which time your data will be deleted.
Who can access my data?	We will never sell, share or otherwise distribute your data to any other third party without your explicit consent.
How is my data kept secure?	We will store your data on secure UK based servers which will be processed in the UK. We use industry standard security protocols/technology to secure data.

We take your privacy seriously and will only use your personal information to provide the services you have requested from us and to send you information about services you may be interested in. We will never sell, share or use your personal information for other than as described here and always with your consent.

About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Intelligent Ocean Ltd.

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not

disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection.

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Loss or damage caused as a result of any data breach or other incident

Who We Are And How To Contact Us

Intelligent Ocean Ltd is a trading name of Intelligent Ocean Ltd that is registered in United Kingdom and is registered with the Information Commissioner's Office. The data controller is: **Alison Gill**. You can contact us in any of the following ways:

Email: info@intelligentocean.com

Phone: 07708 395837

Website: www.intelligentocean.com

Post: Intelligent Ocean Ltd, 21 Pentney Lakes, Common Road, Kings Lynn, Norfolk. UK. PE32 1LE.

Who this privacy policy applies to

Intelligent Ocean Ltd is a Training and Consultancy Company. This policy relates to users of Intelligent Ocean Ltd. Processing of your data is required in order to offer you these services. This policy applies to individuals who have shared their data with Intelligent Ocean Ltd as either a client, employee, trainee, supplier or in any other capacity.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- Financial information
- Company/project information
- Other information provided by you as required by us to provide our services to you

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us
- When you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information relating to services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship
- Information from other third parties that we collect in order to meet our commitments to you
- Information we collect from public domain sources including social media and other sources
- All other information we collect as part of our ongoing relationship

We do not routinely collect or process sensitive data about you, however where this is the case this will only be with your consent and we will take appropriate precautions to protect your data.

How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new client	(a) Identity, (b) Contact	Performance of a contract with you and in our legitimate interest
To process and deliver the services you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us, (c) Necessary to operate our business
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services, or privacy policy, to maintain our records	(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 clients use our services
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical, (d) Marketing and Communications	(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 content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of clients for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
In all other respects, to run our company, and provide our services to our customers.	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	Necessary for our legitimate interest to run our business and provide our services to our customers.

We may collect and process information about you, including your name, address, contact details (including email address and mobile phone number), product and service details, purchase history and

data collected as part of any finance arrangement or payment (including previous addresses, employment details and bank account details). We may take personal information from:

- Information that you provide to us when registering with our website (including your email address)
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to any purchases you make of our services, including any other transaction details made via any of our websites (including your address, telephone number and payment details)

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding the possible purchase of services
- To carry out our obligations arising from any contracts entered into between you and us including the provision of services, and to respond to queries from you regarding those contracts
- To manage and administer the relationships between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
- To obtain feedback from you regarding us

In accordance with your preferences, we may also use your personal information to provide you with information about services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

How to change your preferences

We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at anytime.

Scope of Agreement

By submitting your personal data on this site or as required for us to provide services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this

document.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at anytime. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

How we store and process your data

Your data will be collected stored and processed in the UK only, we do not transfer your data outside the EU. Your data will be stored for up to 7 years unless otherwise stated to ensure we have records of service, payments, and other interactions we have with you. For more details please see our Data Retention and Erasure policy.

In order to provide our services to you, we use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case we will ensure precautions are in place to protect your data.

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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us or purchased services from us
- You have not opted out of receiving marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes
- We will take steps to ensure your data is accurate and rectify data as necessary

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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.

Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide our website development, hosting, email services, IT and other system administration services.
- Our communications equipment, mobile phone, network, and related services supplier
- Third parties who provide advertising and marketing services.
- Websites including social media we use to advertise our services
- Professional advisers including but not limited to: HR companies, compliance companies, lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance, accounting services, and other companies as required to run our business.
- Couriers, delivery companies, or other parties necessary to provide our services to you.
- Our insurance company, legal representatives, and other professionals engaged by us
- Other third parties we use to operate our business but only as required and as you would reasonably expect
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Under the GDPR, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

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 such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage,

please contact us.

This 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 notice of every website you visit.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to client needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

Social Media

If you share our content through social media, for example by liking us on Facebook, following or tweeting about us on Twitter, or giving us a '+1' via Google Plus, those social networks will record that you have done so and may set a cookie for this purpose.

In some cases, where a page on our website includes content from a social network, such as a Twitter feed, or Facebook comments box, those services may set a cookie even where you do not click a button. As is the case for all cookies, we cannot access those set by social networks, just as those social networks cannot access cookies we set ourselves.

Log Files

Our systems automatically gather some anonymous information about visitors, including IP addresses, browser type, language, and the times and dates of webpage visits. The data collected does not include

personally identifiable information and is used, as described above, for statistical analysis, to understand user behaviour, and to administer the site.

Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage for example:

- The number of people using it
- The pages users visit
- The journey users take through the site
- Where users enter the site
- Where users come from
- Where users exit
- The demographics of our users (Geographical location, device, Internet browsers, and operating system)

Google Analytics does not personally identify you to us and though it records your device's IP address which could be used to personally identify you. It does not grant us access to this. We consider Google to be a third party data processor. Google Analytics site uses cookies. Details about these can be found on Google's developer guides.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Further information about Google's privacy policy may be obtained from <http://www.google.com/privacy.html>.

Legitimate Interests

We have conducted a Legitimate Interest Assessment to ensure you are not adversely affected by our marketing activity.

Contacting us, exercising your information rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Alison Gill at Intelligent Ocean Ltd. We will process SARs within 30 days, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a

decision. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

www.ico.org.uk

End of Document.