

Information Security Privacy Notice

For external clients & data subjects

Policy owned by	Information Security Manager
Date	30/9/2024
Linked documents	Data Protection Policy

Date	Version	Revision author	Approved by	Comments
9/9/2024	1.0d	Jennifer Bruton – Bores Group Ltd	n/a	Initial draft as part of ISO implementation project
30/9/2024	1.0	Jennifer Bruton – Bores Group Ltd	James Moore – Info Sec Mgr	Final approval as part of ISO implementation project

Employees and third-party users are responsible for ensuring that they understand fully the requirements and controls set out within this policy. For guidance, support and queries please contact Infosecurity@genmar.co.uk

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Privacy notice

This privacy notice tells you what to expect us to do with your personal information. The information provided is applicable where Genmar UK Ltd is acting in the role of Data Controller.

The majority of the work carried out by Genmar UK Ltd is in the role of Data Processor, where Genmar UK Ltd is carrying out processing of data on behalf of a client. The basis for this processing is contractual requirement.

Data Controller: *the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Controllers make decisions about processing activities. They exercise overall control of the personal data being processed and are ultimately in charge of and responsible for the processing.” – as defined by the Information Commissioner’s Office*

Data Processor: *“the a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Processors act on behalf of the relevant controller and under their authority. In doing so, they serve the controller’s interests rather than their own. Although a processor may make its own day-to-day operational decisions, Article 29 says it should only process personal data in line with a controller’s instructions, unless it is required to do otherwise by law.” – as defined by the Information Commissioner’s Office*

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/controllers-and-processors/controllers-and-processors/what-are-controllers-and-processors/>

Where Genmar UK Ltd is acting in the role of Data Processor they shall commit to ensure that the data is processed in accordance with both their legal and contractual obligations and meet, as a minimum, the same principles set out within this notice, where possible.

Please note where Genmar UK Ltd is acting in the role of Data Processor any complaints, queries and subject access requests should be directed to the relevant Data Controller. Genma UK Ltd shall assist the Data Controller in any response when required and instructed to by the Data Controller.

Contact details

Genmar UK Ltd has an Information Security Team who are responsible for managing and maintaining Information Security within the organisation. They can be contacted at:

Infosecurity@genmar.co.uk

What information we collect, use, and why

We collect or use the following information to meet contractual requirements. The data we collect is used expressly for the purposes specified within our contractual agreements with the client. The data is required for the following purposes:

- Administration of Customer or client accounts and records
- Performance of contractual agreements including, but not limited to, providing IT managed services
- Evaluation of the services performed in the form of surveys, where consent is given by the data subject

Lawful bases

Our lawful bases for collecting or using personal information for the purposes listed above are:

- Contract

Where we get personal information from

- People directly
- Clients acting in the role of Data Controller

How long we keep information

7 years from termination of contract/services, unless otherwise directed by the relevant Data Controller

Who we share information with

Genmar UK Ltd employs the use of the following Data Processors for the purposes of managing and storing client data, including generating invoices:

Processor	Description of Processing
IT Glue	Contact information for account management purposes ie. Usernames, credential management
Halo	Contact information for account management purposes ie. Usernames, records of service requests, invoices, quotes and customer satisfaction surveys
Microsoft	Contact information for client administration purposes and records of invoices and quotes

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal data.

Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal data in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request where Genmar UK Ltd is the Data Controller, please contact us using the contact details at the top of this privacy notice.

To make a data protection rights request where Genmar UK Ltd is the Data Processor, please contact the Data Controller directly using the contact details provided within their Privacy Notice.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Policy Compliance

Compliance Measurement

The information security manager will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

Exceptions

Any exception to the policy must be approved and recorded by the Information Security Manager in advance and reported to the ISSG.

Non-Compliance

An employee or third-party user found to have violated this policy may be subject to disciplinary action, up to and including termination of employment or contractual review.

Continual Improvement

The policy is updated and reviewed as part of the continual improvement process.