



Policy 05 - Records, Data Protection & Retention

1. PURPOSE

This policy sets out how Surge Crew creates, maintains, protects, and retains records relating to recruitment and placement activities, in line with the principles of the Maritime Labour Convention, 2006 (MLC), the UK General Data Protection Regulation (UK GDPR), and the Data Protection Act 2018.

The purpose of this policy is to ensure:

- Accurate and transparent record keeping
- Protection of personal data
- Appropriate retention and secure disposal of records

2. SCOPE

This policy applies to:

- All personal data and records held by Surge Crew
- All seafarers registered with Surge Crew
- All clients, yachts, and recruitment partners
- All recruitment, sourcing, and placement activities

3. TYPES OF RECORDS MAINTAINED

Surge Crew may maintain records including, but not limited to:

- a) Seafarer records
 - i. CVs and professional profiles
 - ii. Contact details
 - iii. Certification and qualification information
 - iv. Reference check notes
 - v. Availability and role preferences

- b) Recruitment and placement records
 - i. Vacancies handled
 - ii. Seafarers introduced
 - iii. Comparison tables
 - iv. Placement outcomes



- c) Compliance records
 - i. MLC policies and procedures
 - ii. Complaints log and related correspondence
 - iii. Consent records
 - iv. ICO registration details

4. DATA PROTECTION & SECURITY

Surge Crew takes appropriate technical and organisational measures to protect personal data, including:

- Secure, password-protected systems
- Controlled access to records
- Use of reputable third-party platforms (e.g. CRM, recruitment platforms)
- Regular review of data access and storage practices
- Personal data is processed only for legitimate recruitment and placement purposes.

5. LAWFUL BASIS FOR PROCESSING

Personal data is processed on the basis of:

- Consent provided by seafarers
- Legitimate interests relating to recruitment activities
- Legal and regulatory obligations where applicable
- Seafarers may withdraw consent at any time.

6. SEAFARER REGISTER

Surge Crew maintains an up-to-date register of seafarers who have been actively engaged in the recruitment process.

A record is created where direct contact or engagement has taken place with a seafarer in relation to a specific role or employment opportunity. Applications where no contact or further engagement occurs are not retained within this register.

The register includes relevant details of recruitment activity, including where applicable:

- Seafarer details
- Roles discussed or applied for
- Dates of engagement
- Outcomes of the recruitment process



Records are retained for a minimum period of **12 months** from the date of last engagement, in accordance with applicable legislation and Maritime Labour Convention requirements.

This register is maintained in a format that can be made available for inspection by the competent authority where required.

7. REVIEW & DELETION OF RECORDS

Surge Crew periodically reviews records to ensure they remain relevant.

Where records are no longer required:

- Personal data is securely deleted or anonymised
- Digital records are permanently removed from systems
- Deletion requests from seafarers are handled promptly in line with UK GDPR

8. DATA SUBJECT RIGHTS

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion of data
- Object to or restrict processing
- Withdraw consent

Requests should be submitted to: crew@surgeyachting.com

9. DATA BREACHES

Any suspected data breach is assessed promptly.

Where required:

- Affected individuals will be notified
- The Information Commissioner's Office (ICO) will be informed in line with statutory requirements

10. THIRD-PARTY PROCESSORS

Surge Crew may use third-party platforms to support recruitment activities.



Where third parties process personal data:

- Appropriate data protection measures are expected
- Data is shared only where necessary
- Responsibility for data protection remains with Surge Crew

11. REVIEW OF THIS POLICY

This policy is reviewed periodically and updated as required to reflect changes in legislation, business operations, or industry standards.