

Newhaven Marina Holding Company Ltd

PRIVACY POLICY

1. INTRODUCTION

Newhaven Marina Holding Company Ltd is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

From 1st May 2018, NHC Ltd will ask its customers to “opt-in” for marketing communications. This is due to a change to the rules which govern how we can communicate with you and a new regulation on personal data (the General Data Protection Regulation) coming into force on 25th May 2018. Therefore, we are introducing a new approach that relies on you giving us your consent about how we can contact you. This means you’ll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (email, phone, SMS or post).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact us by emailing info@newhavenmarina.co.uk, writing to: Newhaven Marina, The Yacht Harbour, Fort Road, Newhaven, East Sussex, BN9 9BY or telephoning +44 (0)1273 513881.

We will never sell your personal data and will only ever share it with organisations we work with and if its privacy and security are guaranteed.

Questions?

Any questions you have in relation to this policy or how we use your personal data should be sent to info@newhavenmarina.co.uk, writing to: Newhaven Marina, The Yacht Harbour, Fort Road, Newhaven, East Sussex, BN9 9BY or telephoning +44 (0)1273 513881.

2. ABOUT US

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by Newhaven Marina Holding Company Ltd, a company incorporated under companies Acts (company number 11114977) and whose registered office is at 10 Prince Albert street, Brighton, BN1 1HE.

3. WHAT INFORMATION WE COLLECT

Personal data you provide

We collect data you provide to us. This includes information you give when communicating with us, making a booking/reservation, or taking out a contract for services. For example:

- personal details (name, address, email, telephone number etc.) when you make an enquiry or a booking.

and

- financial information (payment information such as credit/debit card or direct debit details. (Please see section 8 for more information on payment security); and

Information created by your involvement with NMH Ltd

Your activities with the company will result in personal data being created. This could include details of how you have utilised additional services such as fuel, boat lifting, undercover storage and misc. sales.

Information we generate

We conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your activities we may be able to build a profile which helps us decide which of our communications are likely to services and facilities that interest you. Section 6 (Research and profiling) contains more information about how we use information for profiling and targeted advertising.

Information from third parties

We sometimes receive personal data about individuals from third parties. For example, if we are working/partnering with another organisation (e.g. you provide your information to another marine related service provider). Also, as explained in Section 11 (links to other sites).

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Sensitive personal data

We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about our customers. However, there may be situations where this will occur (e.g. if you an accident at our marina). If this does occur, we'll take extra care to ensure your privacy rights are protected.

Accidents or incidents

If an accident or incident occurs on our property, at one of our events or involving one of our staff then we'll keep a record of this (which may include personal data and sensitive personal data).

4. HOW WE USE INFORMATION

We only ever use your personal data with your consent, or where it is necessary in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- protect your vital interests;
- for our own (or a third party's) lawful interests, provided your rights don't override the these.

In any event, we'll only use your information for the purpose or purposes it was collected for.

Marketing

We use personal data to communicate with people, to promote the services of Newhaven Marina Holding Company Ltd. This includes keeping you up to date with our news and updates. For further information on this please see Section 5 (Marketing).

Administration

We use personal data for administrative purposes to undertake our work This includes:

- receiving payments (e.g. direct debits or bacs, telephone or payments in person);
- maintaining databases of customers;
- performing our obligations under our contracts;
- fulfilling orders for goods and services (whether placed online, over the phone or in person);
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

Internal research and analysis

We carry out research and analysis on our customers, to determine the success of services, facilities and promotions. This enables us to better understand behavior and responses and identify patterns and trends. This helps inform our approach towards future promotions, offers and strategies and make Newhaven Marina Holding Company Ltd a more effective organisation for customer enjoyment. Understanding our customers, their wants and needs also helps us provide a better experience (e.g. through more relevant communications).

Customer research and profiling

We evaluate, categorise and profile personal data in order to tailor materials, services and communications (including targeted advertising) and prevent unwanted material from filling up your inbox. This also helps us understand our customers, improve our organisation and carry out research. Further information on profiling can be found in Section 6 (Research and profiling).

5. DISCLOSING AND SHARING DATA

We will never sell your personal data. If you have opted-in to marketing, we may contact you with information about our partners, or third-party products and services, but these communications will always come from Newhaven Marina Holding Company Ltd and are usually incorporated into our own marketing materials (e.g. advertisements in magazines or newsletters).

We may share personal data with subcontractors or suppliers who provide us with services. For example, if you order a hire car through Newhaven Marina Holding Company Ltd, your name and address will be shared with the car hire company. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another marine related supplier). We'll only share information when necessary and we'll make sure we notify you first.

6. MARKETING

From 1st May 2018, Newhaven Marina Holding Company Ltd will ask its customers to "opt-in" for most communications. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about Newhaven Marina Holding Company Ltd).

This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post, phone, email, SMS).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact info@newhavenmarina.co.uk, writing to: Newhaven Marina, The Yacht Harbour, Fort Road, Newhaven, East Sussex, BN9 9BY or telephoning +44 (0)1273 513881.

What does 'marketing' mean?

Marketing does not just mean offering things for sale, but also includes news and information about:

- the work that we do, site specific and group developments,
- our role in supporting the boating industry;
- customer benefits and offers;
- marina related opportunities
- notices on behalf of Regulators (e.g. notice to mariners)
- our events, and activities;
- products, services and offers (our own, and those of third parties which may interest you);
- taking part in projects and joint initiatives (e.g. Food Festival events); and

When you receive a communication, we may collect information about you, respond to or interact with that communication, and this may affect how we communicate with you in future.

Newsletters

Newsletters are provided as a benefit to our customers. We send these out to all our customers (unless you specifically ask us not to) and you can choose to unsubscribe from general marketing communications at any time. Please be aware however that member newsletters do include advertisements, promotions and offers from time to time.

7. RESEARCH AND PROFILING

This section explains how and why we use personal data to build profiles which enable us to understand our customers, improve our relationship with them, and provide a better experience.

Analysis and grouping

We analyse our customers to determine common characteristics and preferences. We do this by assessing various types of information including take up of promotions, trends in usage or demographic information (e.g. age or location).

By grouping people together on the basis of common characteristics, we can ensure that group is provided with communications, products, and information which is most important/relevant to them. This helps prevent your inbox from filling up, and also means we aren't expending resources on contacting people with information which isn't relevant to them.

Profiling to help us understand our customers

We profile customers in terms of activities within the marina. For example, we keep track of the amount, frequency and value of each fuel berth transaction. This information helps us to ensure communications are both relevant and timely.

If, based on information that has been provided to us (such as geographical location, demographics, or previous marina activities), it appears an individual might be interested in related services or information we may contact them.

On occasion, we may also combine information about particular customers with external information (such as directorships listed on Companies House, or news about an individual which has featured in the media) in order to create a more detailed profile about a particular individual.

We will also obtain information about you from other sources, much of which is available on public and private databases. We do this to enhance and fill-in any gaps so that we can understand our customers better, send you the most relevant communications and target our resources effectively. Examples of information we'll obtain are details of, newspapers you read, shopping habits, financial products and leisure interests.

Anonymised data

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as targeting new customers, or to identify trends or patterns within our existing customer base. This information helps inform our actions and improve our campaigns, products and services.

8. YOUNG PEOPLE

Photographs, pictures, stories and competitions in our media

We want young people to join in with all things boating, and there are opportunities in our social media for readers to share their photos, stories and pictures. If we publish your child's picture, photo or story, we'll usually include their first name and age with it. If they write an article or story for us, we might also include their surname alongside it.

Parental permission: If your child is under 18 then we'll need permission from you as their parent or guardian for them to share a picture, photo or story with us.

Information for parents

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 18, we'll only use his or her personal data with your consent. This means that, for example, if your child wants to have his or her name or picture featured in one of our publications or media, we'll need you to confirm you're happy for us to do so.

Marketing

We won't send marketing emails, letters, calls or messages to under 18 year-olds.

9. HOW WE PROTECT DATA

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Payment security

Newhaven Marina Holding Company Ltd complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

CCTV

Our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and our customers assets. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review, CCTV will be recorded over.

Newhaven Marina Holding Company Ltd complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices, so you know when CCTV is in use.

10. STORAGE

Where we store information

Newhaven Marina Holding Company Ltd operation is based in the UK and we store our data within the European Union. Some organisations which provide services to us may transfer personal data outside of the EEA, but we'll only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we'll allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

How long we store information

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you

marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

11. KEEPING YOU IN CONTROL

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to our appointed Data Protection representative: danmckiernan@marinaprojects.com. Or alternatively write to Mr D McKiernan, Marina Projects Ltd, The Design Office, Mumby Road, Gosport, PO12 1AH.

Complaints

You can complain to personnel at Newhaven Marina Holding Company Ltd directly by contacting our appointed data protection representative using the details set out above. If wish to make a complaint (including a complaint about our activities) which does not directly relate to your data protection and privacy rights, you can do so direct to Newhaven Marina Holding Company Ltd: info@newhavenmarina.co.uk, writing to: Newhaven Marina, The Yacht Harbour, Fort Road, Newhaven, East Sussex, BN9 9BY or telephoning +44 (0)1273 513881.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk

12. LINKS TO OTHER SITES

Links to other sites

Our website contains links to many other websites/service providers. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the page).

If an external website requests personal information from you (e.g. in connection with an enquiry or order for goods or services), the information you provide will not be covered by the Newhaven Marina Holding Company Ltd Privacy Policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with Newhaven Marina Holding Company Ltd.

13. CHANGES TO THIS PRIVACY POLICY

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated on 30.04.2018.