

# **Privacy Policy**

At Shepperton Marina, Barge World & Boat Showrooms, we take your privacy seriously and this privacy statement explains what personal data or information we collect from you and from people who visit our website and how we use it.

#### Who are we?

Shepperton Marina Ltd is a registered company **1087117**, our registered office address is 21-27 Lamb's Conduit Street, London, WC1N 3GS. For the purposes of Data Protection Shepperton Marina Ltd, is a registered data controller ICO registration number Z2266294.

# What personal data or information do we collect?

The personal information we collect may include your name, address, email address, IP address and information regarding what pages you access on this website and when. Video footage collected via CCTV across the marina, including marina office, marina services office, and workshop.

#### How do we collect data or information from you?

- 1. Make an enquiry via our website via the telephone via the Linssen factory or exhibitions.
- 2. Use our website.
- 3. Take part in a prize draw or competition.
- 4. When you choose to receive news, updates or press releases.
- 5. Enquire about a job opportunity.
- 6. Work for or with the marina or sales office.
- 7. Supplier Contracts, Contacts, and Invoices.
- 8. Exchange business cards with a member of the marina or sales office.
- 9. Buy ancillary services such as fuel, yard services and training courses.
- 10. CCTV covering the marina, marina office, marina services office and workshop.
- 11. Via Body Cams worn by Shepperton marina Staff and Night Watchman.

# How is your information used?

- 1. We collect your personal data or information to operate our marina and sales offices effectively and provide you with the best information on our products and services. We may use your information to:
- 2. To administer your mooring contract.
- 3. To answer enquiries that you make before any agreement or contract.
- 4. To keep you informed about our services, river conditions, and invitations to events, if you have opted-in to receive these communications.
- 5. To process payment(s) for ancillary services such as fuel sales and marina yard services.
- 6. To process a job application
- 7. To fulfil our obligations as an employer
- 8. To provide benefits to you as an employee
- 9. To maintain the security of our office and IT infrastructure
- 10. To invoice you, and to track payments you make or payments made to you



- 11. Video footage (Body Cam/CCTV) will be used to provide evidence in the instances of:
  - a) Breach of Terms and Conditions
  - b) Criminal behaviour
  - c) Request for footage by Authorities (Subject Access Request Required)

We believe that all these purposes are justified based on our legitimate interests in running and promoting the marina and sales offices, our contractual requirements to deliver the agreed services to you, and our legal obligations, both as a Marina operator and responsible employer. If you would like to know more, please read below:

- 1. Berth Holders
- 2. Prospective Berth holders
- 3. Visitors
- 4. New Boat Sale Customers
- 5. Brokerage Boat Sale Customers
- 6. Job Applicants
- 7. Our Current and Former Employees
- 8. Contractors working directly for berth holders.
- 9. Suppliers
- 10. Fuel and Yard Services customers

Details of our Processing	Type of Data Held	Length of Time Held	How Data is Held
Berth Holders	<ol> <li>Name and contact information.</li> <li>Emergency contact details.</li> <li>Information and documents relating to the services we are providing, including communications with you.</li> <li>Billing and payment information.</li> <li>Information relating to the vessel (s) you have moored in the marina.</li> <li>Information about vehicles visiting the site</li> <li>Details of vessel insurance</li> <li>CCTV Footage from within the marina, marina office, marina services office.</li> </ol>	We will retain information about you for the duration of your mooring contract with us, then for an additional 6 years.  We retain financial records for 6 years, following the end of the current financial year.  CCTV Footage is retained for 21 days unless formerly requested by an authorised party.	Data is stored in Harbour Assist and Xero which are hosted in secure servers or cloudbased within the EEA.  Limited Data is stored in Rolec Services Smart Master Prepayment System for those customers buying electricity which is hosted in secure servers or cloud-based within the EEA.



	9. Bodycam footage as worn by staff members, namely dock masters and the night watchmen.	Bodycam footage is retained for a maximum of 60 days unless formerly requested by an authorised party.	Limited data is stored on Paxton Net2 Access Control UK which is hosted in secure servers or cloud-based within the EEA.
Prospective Berth Holders	<ol> <li>Name and contact information</li> <li>Information and documents relating to the services we are providing, including communications with you.</li> <li>Current mooring details.</li> <li>Information relating to the vessel (s) proposed.</li> <li>CCTV Footage from within the marina, marina office, marina services office.</li> <li>Bodycam footage as worn by staff members, namely dock masters and the night watchmen.</li> </ol>	We will retain information about you for the duration of the enquiry, then a further two years.  CCTV Footage is retained for 21 days unless formerly requested by an authorised party.  Bodycam footage is retained for a maximum of 60 days unless formerly requested by an authorised party.	Data is stored in computer-held records which are password controlled. Data waiting to be uploaded may be stored in locked filing cabinets.
Visitors	<ol> <li>Name and contact information.</li> <li>Information and documents relating to the services we are providing, including communications with you.</li> <li>Billing and payment information.</li> <li>Information relating to the vessel (s) you have moored in the marina.</li> <li>CCTV Footage from within the marina, marina office, marina services office.</li> <li>Bodycam footage as worn by staff members, namely dock masters and the night watchmen.</li> </ol>	We will retain information about you for the duration of your mooring contract with us, then for an additional 6 years.	Data is stored in Harbour Assist and Xero which are hosted in secure servers or cloud-based within the EEA.



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		unless formerly requested by an authorised party.	
New Boat Sales Customers	<ol> <li>Name and contact information.</li> <li>Information and documents relating to the services we are providing, including communications with you.</li> <li>Billing and payment information.</li> <li>Information relating to the vessel (s) being transacted.</li> <li>Information relating to current vessel (s).</li> <li>CCTV Footage from within the marina, marina office, marina services office.</li> <li>Bodycam footage as worn by staff members, namely dock masters and the night watchmen.</li> </ol>	We will retain information about you for the duration of your sales contract with us, then for an additional 6 years.  We retain financial records for 6 years, following the end of the current financial year.  We retain copies of Bills of Sale relating to the vessel and a copy of the original VAT receipt indefinitely.  CCTV Footage is retained for 21 days unless formerly requested by an authorised party.  Bodycam footage is retained for a maximum of 60 days unless formerly requested by an authorised party.	Data is stored in computer-held records which are password controlled. Data waiting to be uploaded may be stored in locked filing cabinets.  Data is also stored in Xero and Harbour Assist which are hosted in secure servers or cloudbased within the EEA.
Brokerage Boat Sales	Name and contact information.     Information and	We will retain information about you for the duration of	Data is stored in computer-held records which are
	documents relating to the services we are providing, including communications with you.  3. Billing and payment information.  4. Information relating to the vessel (s) being sold.	your brokerage contract with us, and then for an additional 6 years.  We retain financial records for 6 years, following the end of	password controlled. Data waiting to be uploaded may be stored in locked filing cabinets.  Data is also stored in Xero and Harbour Assist which are



		the current financial year.  We retain copies of Bills of Sale relating to the vessel and a copy of the original VAT receipt indefinitely.  CCTV Footage is retained for 21 days unless formerly requested by an authorised party.  Bodycam footage is retained for a maximum of 60 days unless formerly requested by an authorised party.	hosted in secure servers or cloud-based within the EEA.
Job Applicants	Name and contact information     CV and application form.	We will retain information about you for the duration of the recruitment campaign, then one year.	Data is stored in computer-held records which are password controlled. Data waiting to be uploaded may be stored in locked filing cabinets.
Current and Former Employees	<ol> <li>Name, date of birth, and contact information</li> <li>National insurance number and Unique Tax Reference (UTR)</li> <li>Information relating to your qualifications, experience and training.</li> <li>Information relating to performance reviews &amp; disciplinary actions.</li> <li>Tax and Pension Records</li> <li>Absence Records</li> <li>Copies of photographic identification</li> </ol>	We will retain information about you for the duration of our contractual relationship with you, then for an additional 6 years.  CCTV Footage is retained for 21 days unless formerly requested by an authorised party.  Bodycam footage is retained for a	Data is also stored in Xero which is hosted in secure servers or cloud-based within the EEA.  Data is stored in Croner Simplify, a hosted UK-based server which is password-controlled.



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	8. Payment details Next of Kin details	maximum of 60 days unless formerly	
	Next of kill details	requested by an	
		authorised party.	
Contractors	1. Name and contact	We will retain	Data is stored in
Working	information.	information about you	computer-held
Directly for	<ol><li>Insurance details</li></ol>	for the duration of	records which are
Berth	3. Risk Assessments	your contract with us,	password controlled.
Holders	4. Details of the vessel being	then for an additional	Data waiting to be
	worked on	6 years.	uploaded may be
	5. Billing and payment information.	We retain financial	stored in locked filing cabinets.
	6. Information about vehicles	We retain financial records for 6 years,	cabinets.
	visiting the site	following the end of	Data is also stored in
	visiting the site	the current financial	Xero and Harbour
		year.	Assist which are
			hosted in secure
		CCTV Footage is	servers or cloud-
		retained for 21 days	based within the EEA.
		unless formerly	
		requested by an	
		authorised party.	
		Bodycam footage is	
		retained for a	
		maximum of 60 days unless formerly	
		requested by an	
		authorised party.	
Suppliers	Contact details	We retain financial	Data is stored in
	2. Bank details	records for 6 years,	computer-held
	3. Description of goods and	following the end of	records which are
	services purchased.	the current financial	password controlled.
		year.	
			Data is also stored in Xero which is hosted
			in secure servers or
			cloud-based within
			the EEA.
Fuel and	1. Name and contact	We retain information	Data is stored in
Yard	information.	about you for one	computer-held
Services	2. Information and	year after your last	records which are
Customers	documents relating to the	visit.	password controlled.
	services we are providing,	Ma matain formation	Data waiting to be
	including communications	We retain financial	uploaded may be
	with you.	records for 6 years,	



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3. Information relating to the vessel (s) you have moored	following the end of the current financial	stored in locked filing cabinets.
in the marina.	year.	
<ol> <li>Billing and payment information.</li> </ol>	CCTV Footage is	Data is also stored in Xero and Harbour
5. Purpose of fuel use.	retained for 21 days unless formerly	Assist which are hosted in secure
	requested by an authorised party.	servers or cloud- based within the EEA.
	Bodycam footage is retained for a maximum of 60 days	
	unless formerly requested by an authorised party.	

#### **Newsletters**

We use a third-party provider, Outlook, to deliver our newsletters and invitations as well as Harbour Assist which has an internal communication programme. As a recipient, you can manage which electronic communications you receive from us and can unsubscribe at any time.

# **Emailing us**

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government standards. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

# Who has access to your information?

We do not sell or rent your personal data or information to any third party or share your information with third parties for their marketing purposes.

We will disclose your data or information if required by law, for example by a court order or for the prevention of fraud or other crime.

We may pass your information on to our third-party service providers, agents or subcontractors to complete a task or provide services to you on our behalf. However, we disclose only the personal information necessary to deliver that service and have a contract in place that requires them to keep your information secure and not to use it for marketing purposes.

Third-party service providers who act as data processors on our behalf:



- 1. **Redsquid Ltd.** The IT support services to Shepperton Marina Ltd. and at times may be required to access our systems for maintenance, upgrade and support services They cannot use the data we hold for their own purposes.
- 2. **Secureassist Security Systems Ltd.** The Security Company to Shepperton Marina Ltd. Who monitor the CCTV Footage, out of hours and access Net2 for maintenance, upgrade and support services. They cannot use the data we hold for their own purposes.

#### Transfers outside of the European Economic Area

Your personal information in the European Economic Area (EEA) is protected by data-protection laws, but other countries do not necessarily protect your personal information in the same way.

The EEA covers all countries in the EU plus Norway, Liechtenstein and Iceland. Shepperton Marina Ltd reserves the right to use online tools which host data outside of the EEA. Before selecting such tools, we review their privacy policy and check that the company is signed up to the EU-US Privacy Shield agreement. Companies who have signed up to this agreement commit to securing personal data in line with EU data protection legislation.

# **Keeping your data secure**

When you give us personal information we take steps to ensure that it's treated securely and strive to protect it on our internal systems.

# Your rights

You have certain rights over the processing of your personal information by Shepperton Marina Ltd. These are:

- 1. The right to be informed, which is what this privacy policy is for
- 2. The right to access the data we hold about you
- 3. The right to object to direct marketing
- 4. The right to object to processing carried out based on legitimate interests
- 5. The right to erasure (in some circumstances)
- 6. The right to data portability
- 7. The right to have your data rectified if it is inaccurate
- 8. The right to have your data restricted or blocked from processing

# How you can update your information

The accuracy of your information is important to us. If you change your contact details or if you want to update any of the information we hold on you, please contact us by emailing <a href="mailto:office@sheppertonmarina.co.uk">office@sheppertonmarina.co.uk</a>, <a href="mailto:englisheppertonmarina.co.uk">enguiries@sheppertonmarina.co.uk</a>, <a href="mailto:broker@boatshowrooms.co.uk">broker@boatshowrooms.co.uk</a>, <a href="mailto:linssensales@boatshowrooms.com">linssensales@boatshowrooms.com</a> or by post at Shepperton Marina Ltd, Felix Lane, Shepperton, Middlesex, TW17 8NS. Alternatively, you can telephone us on 01932 243722.

# How you can access your personal information

You have the right to ask for a copy of the personal information Shepperton Marina Ltd holds relating to you. To do this please contact us by email <a href="mailto:office@sheppertonmarina.co.uk">office@sheppertonmarina.co.uk</a>, <a href="mailto:enquiries@sheppertonmarina.co.uk">enquiries@sheppertonmarina.co.uk</a>,



<u>broker@boatshowrooms.co.uk</u>, <u>linssensales@boatshowrooms.com</u> or by post at Shepperton Marina Ltd, Felix Lane, Shepperton, Middlesex, TW17 8NS. Alternatively, you can telephone us on 01932 243722.

You also have the right to complain about our processing of your personal data with the UK's Information Commissioner's Office.

# Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 19<sup>th</sup> of December 2023.