
PRIVACY POLICY

BACKGROUND:

The Ships Spares Freight 247 Network (SS247) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, shipsparesfreight247.com, the website will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our website. If you do not accept and agree with this Privacy Policy, you must stop using our website immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of our website;
“Cookie”	means a small text file placed on your computer or device by our website when you visit certain parts of our website and/or when you use certain features of our website.
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003

2. Information About Us

Our website is owned and operated by Distinct Services(GS) Ltd, registered in England under company number 04874659.

Registered and Trading address: Sandy Farm Business Centre, Sandy Farm Sands Road, The Sands, Farnham, Surrey, GU10 1PX United Kingdom

Data Protection Co-ordinator: Gary Magee

Email address: Gary@distinct-services.com

Telephone number:01252 781952

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our website. Our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can

be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 14 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner’s Office (in the UK) or your local Data Protection Regulator.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office or your local Data Protection Regulator

6. What Data Do You Collect?

Depending upon your use of our website, we may collect some or all the following personal and non-personal data:

- Name;
- Address;
- Email address;

- Telephone & mobile number;
- Business name;
- Job title;
- Profession;
- Bankers name and account details
- Payment information
- Web IP address;
- Web browser type and version;
- Operating system;

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by e-mailing opt-out to lucy@shipspares247.com)

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the as long as necessary to enable us to perform the services we provide you or to comply with local regulatory requirements (e.g. in the UK we are required to hold records for the tax authorities for seven years)

9. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

We may also store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and

may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We may also share your data within the other membership groups of which we manage. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage.

We may share your data with external third parties that are based outside of the EEA.

The following safeguard are applied to such transfers:

We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection.

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR.

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe.

10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception:

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for marketing or membership reasons.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

11. How Can I Control My Personal Data?

11.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via our website you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your account).

12. Can I Withhold Information?

You may access certain areas of our website without providing any personal data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information on Cookies see Section 13.

13. How Do You Use Cookies?

Our website may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our website and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on our website are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our website may not function fully or as intended.

14. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

15. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Gary Magee):

Email address: Gary@distinct-services.com.

Telephone number: 01252 781952.

Postal Address: Sandy Farm Business Centre, Sandy Farm Sands Road, The Sands, Farnham, Surrey, GU10 1PX. United Kingdom

16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change business in a way that affects personal data protection.

Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.