

## WEBSITE PRIVACY POLICY

### INTRODUCTION

Welcome to our privacy policy.

Lacy & Middlemiss Shipbrokers Limited (“**we**”, “**our**”, “**us**”,) respect the privacy of our website users (“**you**”) and we recognise the need for appropriate protections and management of your personal information.

This privacy policy will inform you as to how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

We may update this privacy policy at any time. Please check this page when you visit our website.

### GLOSSARY

When we refer to **Data Protection Legislation** we mean the General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”); and the Data Protection Act 2018.

**Personal information** is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, email address, etc., and also online identifiers and location data such as IP addresses and mobile device IDs.

**Special category data** means personal information revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs; or trade union membership; genetic data; biometric data; data related to your health or data concerning your sex life or sexual orientation; and criminal convictions or involvement in criminal proceedings.

A **data controller** is someone who decides why personal data is to be collected and how it will be used and treated.

### CONTACT US

If you have any questions regarding this privacy policy you can contact us by email at: [dataprotection@denholm-group.co.uk](mailto:dataprotection@denholm-group.co.uk).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### HOW DO WE USE YOUR PERSONAL INFORMATION AND WHY?

If you contact us via the website and provide your name and contact details we will use these details to respond to your query. We do this on the basis of our legitimate interests.

If in response to our response to your query you wish to engage our services we will use your personal information to provide you with those services, as it will be necessary for the agreement we enter into. We may not be able to provide the services without your personal details.

We ask that you do not provide any special category data to us or any personal information which is not relevant to your query.

## MARKETING

If you provide us with a telephone number or postal address we may send you non-electronic forms of communication (post and live calls), based on our legitimate interest. We will only send you digital communications (email and text) with your explicit and prior consent.

You will always have the option to unsubscribe from any of our marketing communications at any time. Our marketing materials will cover the services that we and companies in our group can provide.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## DO WE SHARE PERSONAL INFORMATION?

We are part of a group of companies and therefore we share the same IT infrastructure. Details of our group companies is available at <http://denholm-group.co.uk/>. We will not pass your details to a group company outwith the EU.

We may also be required to disclose your personal information to:

- any other person who is authorised to act on your behalf;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant dispute resolution body or the courts; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in our business.

We will not sell, trade or lease your personal information to others. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## EUROPEAN ECONOMIC AREA

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA). However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to correspond with you.

We also may transfer data outside the UK or the EEA where our service providers host, process, or store data outside the UK or the EEA.

## RETENTION PERIODS

We will not hold your personal information for any longer than is necessary for the uses outlined above, unless we are required to keep your personal data longer to comply with the law and any regulatory requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



## YOUR RIGHTS

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You can exercise your rights by contacting us by email at [dataprotection@denholm-group.co.uk](mailto:dataprotection@denholm-group.co.uk).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

