

GDPR POLICY



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Written By: André Cocuccio
 Checked By: Shirley Barnet

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Marine and Risk Consultants Ltd
 Marico Marine, Bramshaw, Southampton
 SO43 7JB Hampshire, United Kingdom
 Tel. + 44 (0) 2380 811133



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1 INTRODUCTION

Marico Marine is committed to a policy of protecting the rights and privacy of individuals, in accordance with the General Data Protection Regulation (GDPR). GDPR contains provisions that the organisation will need to be aware of as data controllers, including provisions intended to enhance the protection of personal data.

GDPR requires that:

Marico Marine needs to process certain information about its staff, customer, suppliers, and other individuals with whom it has a relationship for various purposes such as, but not limited to:

- The recruitment and payment of staff.
- The day to day purchasing and sales of goods
- The making or receiving of payments as part of day to day trading
- To contact you about a submission or request for information you have made.
- In relation to any correspondence we receive from you or any comment or complaint you make about our products or services.
- Complying with legal obligations and government including local government.

To comply with various legal obligations, including the obligations imposed on it by GDPR, Marico Marine must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

2 COMPLIANCE

All members of staff are responsible for ensuring that any personal information which they hold is kept securely and not disclosed to any unauthorised third parties. Marico Marine will ensure that all personal information is accessible only to those who have a valid reason for using it. Marico Marine will have in place appropriate security measures to protect information physically and electronically.

As a matter of best practice, other agencies and individuals working with Marico Marine and who have access to personal information, will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies sign a contract which among other things will include an agreement to abide by this policy.

Consent as a basis for processing information although not always necessary is the best way to ensure that information is collected and processed in an open and transparent manner. Consent is especially important when Marico Marine is processing any sensitive information, as defined by the legislation.

Marico Marine understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement. Marico Marine also confirms consent cannot be inferred from the non-response to a communication.

This policy will be updated as necessary to reflect best practice in information management, security, and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation. This policy applies to all staff of Marico Marine. Any breach of this policy or of the Regulation itself will be considered an offence and the company's disciplinary procedures may be invoked.

3 RESPONSIBILITY

Responsibilities under GDPR Marico Marine will be the 'data controller' under the terms of the legislation. This means it is ultimately responsible for controlling the use and processing of personal data. The company appoints a Data Protection Officer (DPO) for each site who is available to address any concerns regarding the data held by the company and how it is processed, held, and used.

The Senior Management Team is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the company.

The Senior Management Team is also responsible for ensuring that the Company's policy is kept up to date. Details of the Marico Marine's policy can also be found on their website.

Compliance with the legislation is the personal responsibility of all staff at Marico Marine who process personal information.

Individuals who provide personal data to Marico Marine are responsible for ensuring that the information is accurate and up-to-date.

4 DATA PROTECTION PRINCIPLES

4.1 PROCESS PERSONAL DATA FAIRLY AND LAWFULLY (THE RIGHT TO BE INFORMED)

Marico Marine will make all reasonable efforts to ensure that individuals who are the focus of personal Identifying information (PII) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

The Company will ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed. Marico Marine will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained.

The Company will process the data for the specific and lawful purpose for which it was collected and not further process the data in a manner incompatible with this purpose. The Company will ensure that the reason for which it collected the data originally is the only reason for which it processes that data unless the individual consents to any additional processing before it takes place.

Marico Marine undertakes not to disclose personal data to unauthorised third parties. Legitimate disclosures may occur in the following instances:

- Where the individual has given their consent to the disclosure.
- The disclosure is required for the performance of a contract.

There are other instances when the legislation permits disclosure without the consent of the individual.

CCTV. There are some CCTV systems operating at Marico House for the purpose of protecting staff and property. Marico Marine will only process personal data obtained by the CCTV system in a manner which ensures compliance with the legislation.

4.2 SUBJECT ACCESS RIGHTS (SARS) (THE RIGHT OF ACCESS)

Individuals have a right to access any personal data relating to them which is held by Marico Marine. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

Any individual wishing to exercise this right should apply in writing to the Data Protection Officer.

Any member of staff receiving a SAR should forward this to the Data Protection Officer.

To ensure security we require you to prove your identity with 2 pieces of approved identification before any SARs request can be released.

4.3 KEEP PERSONAL DATA ACCURATE (THE RIGHT TO RECTIFICATION).

It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and everyone should notify the Company if a change in circumstances mean that the data needs to be updated.

It is the responsibility of the Company to ensure that any notification regarding the change is noted and acted on.

4.4 ONLY KEEP PERSONAL DATA FOR AS LONG AS IS NECESSARY (THE RIGHT TO ERASURE).

Marico Marine undertakes not to retain personal data for longer than is necessary to ensure compliance with GDPR legislation, and other statutory requirements. This means Marico Marine will undertake a periodic review of the information held and implement a purge process as required.

Marico Marine will dispose of any personal data in a way that protects the rights and privacy of the individual concerned.

4.5 RESTRICT THE PROCESS OF PERSONAL INFORMATION.

Individuals have the right to prevent processing of information while that information is subject to corrective action

At any time, a person can request to know what information is stored and request action to rectify, block, erase or destroy inaccurate information while that process is underway.

4.6 ENSURE THAT NO PERSONAL DATA IS TRANSFERRED TO A COUNTRY OR A TERRITORY OUTSIDE OF THE UNITED KINGDOM (UK)

Unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. Marico Marine will not transfer data to such territories without the explicit consent of the individual. This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the UK - so Marico Marine will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If Marico Marine collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

4.7 THE RIGHT TO OBJECT

Allows an individual to prevent processing for purposes of:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- Direct marketing (including profiling).
- Processing for purposes of scientific/historical research and statistics.

5 INCIDENT

GDPR introduces a duty to report certain types of personal data breach to the relevant supervisory authority. Where feasible Marico Marine will do this within 72 hours of becoming aware of the breach. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, Marico Marine will also inform those individuals without undue delay.

This policy will be updated to reflect the General Data Protection Regulation (GDPR) May 2018. Please view the ICO's website (<https://ico.org.uk>) which provides further details and guidance.

For help or advice on any data protection or freedom of information issues, please do not hesitate to contact: The Data Protection Officer (DPO): **André Cocuccio, UK Director**.

Signed: 

Name: André Cocuccio

Role: UK Director, Marico Marine

Date: 29 April 2020

Date to be reviewed: 30 April 2021

SLAVERY & HUMAN TRAFFICKING STATEMENT (MODERN SLAVERY ACT 2015)

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Marine and Risk Consultants Ltd (Marico) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Marico has a zero tolerance to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

1.1 OUR BUSINESS

Marico is a company based at Marico House, Bramshaw, Southampton, UK. We provide marine and risk consultancy services and equipment to Port Authorities and other marine organisations.

1.2 OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Ethical anti-Corruption policy. This sets out how our employees need to respect the laws of the countries with whom they deal and take seriously any occurrences of dishonesty;
- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this;
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will;
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals; and
- Staff handbook. This handbook explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

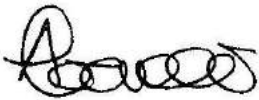
1.3 TRAINING

We will conduct training for our procurement/buying teams if appropriate in order to ensure they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

1.4 APPROVAL FOR THIS STATEMENT

This statement was approved by the Director of Operations (UK):

Signed



André Cocuccio – UK Director

Date: 29 April 2020

Date to be Reviewed: 30 April 2021

EQUAL OPPORTUNITIES POLICY STATEMENT

Marico Marine is committed to encouraging equality and diversity among our workforce and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

Marico Marine – in providing goods and/or services and/or facilities – is also committed against unlawful discrimination of customers or the public.

This policy's purpose is to:

- provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time;
- not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation; and
- oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

In meeting these commitments, Marico Marine will:

- encourage equality and diversity in the workplace as they are good practice and make business sense; and
- create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public;

- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence;

- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation;
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act);
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law; and
- Monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy.

Monitoring will also include assessing how the equality policy, and any sporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

This Equality & Diversity Policy is fully supported by senior management. Details of The Company's grievance and disciplinary policies and procedures can be found in the Marico Staff Handbook. This includes to whom an employee should raise a grievance – usually their line manager. Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination



André Cocuccio – UK Director

Date: 29 April 2020

Date to be reviewed: 30 April 2021


ETHICAL ANTI-CORRUPTION POLICY STATEMENT

Marico Marine (the Company) insists on honesty, integrity and fairness in all aspects of its business and it expects the same of those it does business for and with.

- We observe all applicable laws and regulations of the countries in which we operate.
- Our employees are expected to act lawfully, in a professional manner and with the utmost integrity in their dealings with our clients, competitors, suppliers, the community and each other, striving at all times to enhance the reputation and performance of the Company. They must respect the dignity and human rights of colleagues and the people that we do business with. All new employees at the Company must confirm that they have read the Quick Guide to the Bribery Act 2010 and guidance notes which are sent to them as part of their induction.
- All business transactions on behalf of the Company must be reflected accurately and fairly in the accounts of the Company in accordance with established procedures and be subject to audit.
- We avoid conflicts of interest in the services we provide to our clients. Our employees do not accept or give gifts or hospitality of significant value in any form.
- Our employees must avoid conflicts of interest between their private financial activities and their part in the conduct of the Company's business.
- We take malpractice and dishonesty very seriously. Employees and any associated third parties are encouraged to report any wrong doing by the Company or its employees that falls short of our business policies and principles.

The Company will not tolerate any form of corruption or bribery. This policy applies to all the Company's business dealings and transactions in all countries in which it or its subsidiaries and associates operate. We will observe all applicable laws and regulations in the countries in which the Company does business.

Signed



André Cocuccio – UK Director

Date: 29 April 2020

Date to be Reviewed: 30 April 2021

HEALTH AND SAFETY POLICY STATEMENT

Marico Marine believes that accidents and illness at work are preventable, and that high standards of health and safety management are of the utmost importance to the effectiveness, efficiency and reputation of the company. Marico Marine is committed to protecting the health and safety of employees, clients, contractors, visitors and the communities in which the company operates, both in the UK and overseas.

In meeting these commitments, Marico Marine will:

- Comply with legal and other relevant requirements as pertinent to an office environment;
- Maintain safe and healthy working conditions by identifying and mitigating health and safety risks in the work place and arising from its work activities as pertinent to an office environment;
- Consult with employees on matters affecting their health and safety;
- Provide and maintain equipment in a safe condition;
- Provide appropriate information, instruction and supervision for employees;
- Ensure all employees are adequately trained and are competent to do their assigned tasks; and
- Review and revise this policy at regular intervals and following any significant changes in legislation or circumstances.

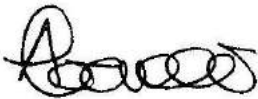
ENVIRONMENTAL POLICY STATEMENT

Marine and Risk Consultants Limited (Marico Marine) is committed to minimising the impact of its activities on the environment in which it operates, both on shore and afloat.

In meeting this commitment, Marico Marine will:

- Comply with legal and other relevant requirements as pertinent to an office environment;
- Assess its activities in order to establish and minimise any adverse consequences for the environment;
- Use appropriate machinery and power sources so as to minimise toxic and polluting emissions into the atmosphere or water, as pertinent to an office environment;
- Strictly control the handling and use of ozone-depleting gases so as to minimise adverse effects on the atmosphere as pertinent to an office environment;

- Minimise waste by evaluating operations and ensuring they are as efficient as possible;
- Actively promote recycling internally (ie ink toners, computer equipment, packaging materials);
- Use environmentally friendly and biodegradable cleaning products;
- Provide information, instruction and supervision for employees;
- Ensure all employees are adequately trained and are competent to do their assigned tasks within the office; and
- Review and revise this policy at regular intervals and following any significant changes in legislation or circumstances.



André Cocuccio – UK Director

Date: 29 April 2020

Date to be reviewed: 30 April 2021

CORPORATE GUIDANCE

CORPORATE SOCIAL RESPONSIBILITY POLICY

Marico Marine is committed to achieving the highest standards of service, delivery and employment practice whilst ensuring equality of opportunity for all personnel within our workforce.

We achieve this through:

- Continuous business improvement in our performance and the delivery of our services;
- Having due regard to efficiency, economy, effectiveness and equal opportunities;
- Acknowledging at all levels the value of each and every individual across our workforce;
- By actively working to *make a meaningful difference*, for Marico, our clients and across the industries in which we operate.

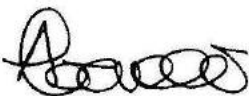
Marico Marine has adopted policies which support the development of a positive and inclusive working environment and organisational culture where all employees have rights to fair treatment, respect, and continuous professional development.

In doing so, we aim to ensure that our employment practices secure equality of opportunity and that no prospective or existing employee receives less favourable treatment as a result of their age, gender, marital status, ethnic origin, disability, or any other reasons which cannot be shown to be justified.

Such policies include:

- Policies in relation to equality, diversity, anti-bribery, anti-slavery etc;
- Promotion of good workforce practices in delivery of services and contracts;
- Provision of an outstanding work environment based in the New Forest, England;
- Fair & contemporary employment terms and conditions for all employees;
- Flexible working opportunities;
- Flexible initiatives for staff assistance;
- A wide range of staff training and development opportunities; and
- A strong commitment to the continued professional development of all team members.

SIGNED:



NAME: André Cocuccio

TITLE: UK Director

DATE: 01/04/2020

QUALITY POLICY STATEMENT

The Marine & Risk Consultants Limited quality policy is to achieve sustained, profitable growth by providing services which consistently satisfy the needs and expectations of its customers.

This level of quality is achieved through the adoption of a system of procedures (processes) that reflect the competence of the Company to existing customers, potential customers, and independent auditing authorities. The procedures can be found on the server and consultants are issued with the updated procedures when produced. Marico procedures are subject to annual review and an audit programme in tune with any risk element.

To ensure company-wide consistency, QA approved forms and templates complement the procedures and these can be found within the relevant folders in the QA area on the server.

Flexibility and the ability to deal, if necessary, with a client's changing needs during a project phase is key to Marico's success in ensuring that a perfect solution is found each time for the client.

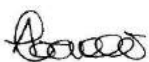
Feedback, via End of Project Audit and external Customer Satisfaction Survey, is actively sought at the termination of each project, or annually for ongoing work, or if a project is not awarded to Marico. This feedback is recorded and analysed by top management at regular intervals in order to continually seek improvement. Achievement of this policy involves all staff, who are individually responsible for the quality of their work, resulting in a continually improving working environment for all. This policy is provided and explained to each employee by the Director or Quality Manager.

To achieve and maintain the required level of assurance the Director retains responsibility for the Quality System with routine operation controlled by the Quality Manager.

The policy of the Quality Assurance System is:

- To maintain an effective Quality Assurance System complying with International Standard ISO9001 (Quality Systems);
- To achieve and maintain a level of quality which enhances the Company's reputation with customers;
- To ensure compliance with relevant statutory and safety requirements;
- To endeavour, at all times, to maximise customer satisfaction with the services provided by Marine & Risk Consultants Limited;
- To comply with the relevant laws and codes of practice of the local place of work;
- To comply with the guidelines laid down in the Bribery Act 2010 which are encompassed in the Company's Ethical and Anti-Corruption Policy, a copy of which is issued to each member of staff;
- To maintain professional secrecy with respect to information gained from the work with clients, their partners and suppliers; and
- To maintain a policy of equality within the work place.

Objectives are set annually to comply with quality policy.



André Cocuccio – UK Director

Date: 29 April 2020 Date to be reviewed: 30 April 2021