



Company Name:	Merchant Navy Resources Limited ('the Company')
Company Contact details:	Port of Liverpool Building Pier Head Liverpool L3 1BY Tel:+44 151 236 6200 dataprotection@mnrltd.com Data Protection Officer: Mr. David Corlett
Document	Privacy Notice (when personal data is obtained directly from the data subject)
Topic:	Data Protection
Date:	25/05/2018
Version:	1.00

The Company is a recruitment and administration business which provides work-finding and administration services to its clients, administered seafarers and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services, client administration and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services and/or client administration services. This includes for example, administration of required documentation and certification, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, developing and managing our services and relationship with you and our clients.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer these services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Ensuring the information held is up to date, verifying information provided, carrying out administration services required to meet client requirements, training, visa application, flight booking, payroll queries and to keep you informed of relevant job opportunities and provide work seeking services.

c. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Client/s that require company recruitment services
- Client/s that require company administration services
- Ship Agents to facilitate joining/leaving of vessel
- Flag state authorities to ensure correctly qualified
- Previous employers to confirm service records
- Recipients as per your request where applicable
- Complying with our legal obligations

d. Statutory/contractual requirement

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract.

2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services and/or providing client administration services. We will take steps to ensure adequate protections are in place to

ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

3. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

4. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your [personal data/[and]sensitive personal data] you have the right to withdraw that consent at any time by contacting the Data Protection Officer

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: the Data Protection Officer

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.