



SCRABSTER HARBOUR TRUST PRIVACY POLICY AND NOTICE

Scrabster Harbour Trust (SHT) is committed to protecting your data and respecting your privacy. This Privacy Policy and Notice applies to all data subjects whose personal data SHT collects, in line with the requirements of the EU General Data Protection Regulation.

Who are we?

Scrabster Harbour is managed and operated by Scrabster Harbour Trust, of Harbour Office, Scrabster, Caithness, KW14 7UJ.

All queries regarding this policy and any data protection matter should be directed to Sandy Mackie, Trust Manager in writing to the above address or by email to harbour@scrabster.co.uk.

Responsibilities

As the data controller, SHT determines how and why data is processed and has a responsibility to bring to your attention certain information about how your data will be used and your rights in relation to the data held.

Disclosure

Except as noted within the relevant sections of this Privacy Notice, SHT will not pass your personal data to third parties without first notifying you.

Safeguards

SHT makes use of a number of IT systems in order to process personal data. SHT has implemented technical and organisational measures to ensure personal data processed remains secure.

Security Measures

SHT takes the security of your data seriously and has put in place internal policies and controls to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by SHT's employees in the proper performance of their duties. Internal networks and systems are securely protected and include systems restrictions.

Your Rights

At any point while SHT is in possession of or processing your personal data, as the data subject, you have the following rights:

- Right to be informed – you have the right to be aware of how SHT uses your information, as set out within this Privacy Policy and Notice.
- Right of access – you have the right to request a copy of the information that SHT holds about you.
- Right of rectification – you have a right to correct data that SHT holds about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data SHT holds about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, to have a right to restrict the processing.
- Right of portability – you have the right to have the data SHT holds about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

If you wish to exercise any of these rights, please contact harbour@scrabster.co.uk

Privacy Notice

SHT collects and processes personal data for a number of different reasons, as set out below. Your data may be collected in one or more ways depending on which service(s) you use.

SHT only collects special categories of personal data in relation to the following services: Recruitment and Employment as set out below.

Information about Consent

Where the basis for processing is consent, by submitting your details, you are accepting and consenting to the practices described in this Privacy Policy and Notice.

If you provide SHT with personal information, you are giving SHT permission to process your personal data specifically for the purposes identified above. Where required, consent must be explicitly given, but can be withdrawn at any time.

You have the right to withdraw your consent at any time by contacting harbour@scrabster.co.uk. Your personal data will be erased within 30 days of your request. However, if SHT have another legal basis for processing your data, it may continue to process that data subject to your legal rights.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by SHT, or how your complaint has been handled, you have the right to lodge a complaint directly with the ICO and with SHT at harbour@scrabster.co.uk

Changes to this Policy

SHT may change this Privacy Policy and Notice at any time by updating this page, please make sure you frequently visit this page. SHT will endeavour to provide you with a notice of change of this page if any amendments occur.

Marketing & Communications

SHT processes personal data for marketing purposes.

The personal data we collect is as follows:

- First and last name.
- Email address.
- Name of company (where applicable).
- Address (where applicable).

The personal data we collect will be used for the following purposes:

- Sending communications, information on events, and other information about Scrabster Harbour.
- Processing any complaints that we receive.

Our legal basis for processing your personal data for marketing purposes is your consent. Where you have consented, we will contact you with marketing material as described above.

We will not collect any special data types for the purpose of sending marketing communications about Scrabster Harbour.

SHT will process and store personal data until you remove your consent for us to contact you. We will erase the data held by us within 30 days of the removal of consent. You may withdraw consent at any time by contacting harbour@scrabster.co.uk

We will not pass information collected for marketing purposes on to third parties.

CCTV Monitoring

SHT carries out CCTV monitoring within Scrabster Harbour.

The personal data we collect is as follows:

- Footage of vessels, individuals and vehicles passing through the Scrabster Harbour estate, including visual images, personal appearances and behaviour.

The personal data we collect will be used to maintain the security of the port environment and the safety of its users.

Our legal basis for processing personal data using CCTV is public task.

We will not collect any special data types through use of CCTV monitoring within Scrabster Harbour. SHT will process and store CCTV footage for 28 days as standard, but up to 6 years if required as evidence within an investigation. Access to CCTV footage is restricted and recordings held on secure devices.

We may pass CCTV footage on to third party law enforcement agencies where required for investigations. A contracted IT company will process footage on our behalf and under our supervision.

Recruitment

SHT processes personal data during recruitment.

The personal data we collect is as follows:

- Name, address and contact details, including email addresses and telephone numbers.
- Details of qualifications, skills, experience and employment history.
- Information about remuneration, including benefit entitlement.
- Details of any disabilities, for which the organisation needs to make reasonable adjustments during the recruitment process.
- Information about entitlement to work in the UK.

The personal data we collect will be used for the following purposes:

- Confirm a candidate's suitability for the role.
- Comply with legal obligations around checking eligibility to work in the UK.
- Make an offer of employment.
- Make reasonable adjustments for candidates with disabilities.

Personal data is collected in a number of ways, including:

- Application forms, CVs or resumes.
- Passports or other identity documents.
- Interviews or other forms of assessment, including online tests.
- Information received from third parties, including through references supplied by former employers, information from employment background check providers and criminal record checks.

We will only seek information from third parties once a job offer has been made to you, and we will inform you that we are doing so. If your application for employment is successful and we make an offer of employment, we will then share your data with former employers to obtain references for you, and employment background check providers to obtain necessary background checks. Our legal basis for processing personal data for recruitment purposes is performance of contract.

We will collect certain special types of personal data for recruitment purposes, including information about disabilities and information contained within passports such as nationality.

SHT will store unsuccessful applications for a period of 6 months after the recruitment process, or 12 months where you have asked us to keep your data on file for consideration for future opportunities. Successful applicants will have their data transferred to their personnel file, which is subject to SHTs internal privacy policy.

We will not pass your data on to third parties without notifying you first.

Tenancy & Licence Applications

Scrabster Harbour Trust processes personal data during tenancy applications and agreements.

The personal data we collect is as follows:

- Name, address and contact details, including email addresses and telephone numbers.
- National insurance numbers, identification and address history for background checks.
- Bank details for taking payment and arranging deposit payments.

The personal data we collect will be used for the following purposes:

- Register an expression of interest generally or in a specific property.
- To carry out background checks on prospective tenants.
- Processing of Tenancy documentation.
- Taking payments and deposits, and returning deposits where applicable.

Personal data is collected in a number of ways, including:

- Application for tenancy
- Passports or other identity documents.
- Information received from third parties, including through references and background check providers.

We will only seek information from third parties once we have informed you that we are doing so. If your application for tenancy is successful and we make a tenancy offer, we may then share your data with reference providers, and background check providers to obtain necessary background checks.

Our legal basis for processing personal data for tenancy purposes is performance of contract.

We will collect certain special types of personal data for tenancy purposes, including information contained within passports such as nationality.

SHT will store tenant details for up to 12 years after tenancy in some cases.

We will not pass your data on to third parties without notifying you first.

Stakeholder Engagement

SHT processes personal data for engagement with stakeholder groups.

The personal data we collect is as follows:

- Name, address and contact details, including email addresses and telephone numbers.
- Details of any stakeholder events attended.

The personal data we collect will be used for the following purposes:

- Contacting members of stakeholder groups such as the Users Group, Port Security Group, Fisheries Group and Trust Body with relevant communications and meeting invitations

Our legal basis for processing personal data members of stakeholder groups is a legal obligation under relevant harbour legislation and legitimate interests.

Where legal obligation is the basis for processing, we will retain information for as long as necessary to discharge our duties under the relevant harbour legislation.

We will not pass information collected for events purposes on to third parties.

Berthing Applications

SHT processes personal data for permanent and visitor berth holder applications.

The personal data we process is as follows:

- Name, address and contact details, including email addresses and telephone numbers.
- Identification, including date of birth and nationality.
- Bank details for taking payment.
- Vessel details and insurance details, which may contain limited personal details.

The personal data we collect will be used for the following purposes:

- Processing berthing applications.
- Identity checks.
- Taking payments for berth services, including berth allocation and shore services.
- Moving information between IT systems to allow payments.

Personal data is collected in a number of ways, including:

- Berthing application forms.

Our legal basis for processing personal data for marina purposes is performance of contract.

We will collect certain special types of personal data for berthing processing purposes, including information contained within passports such as nationality.

SHT will store berth holder details for as long as legally required.

We may occasionally pass data to third party law enforcement agencies where requested.