

CMO Group Privacy Notice (General)

Document:	CMO Group Privacy Notice (General)		
Category:	General Information		
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Applicable to:	General	Version:	2

PRIVACY NOTICE

In accordance with the General Data Protection Regulation (GDPR), Cockett Marine Oil Group ('the Group' which includes Cockett Marine Oil Pte Ltd and all subsidiaries and associated companies) implemented this privacy notice to inform everyone whom it processes personal data on. An overview of the most important categories is listed below: -

- Customer employees
- Prospect employees
- Vendor employees
- Business Counterparties and their employees
- Third parties – Agents / Contractors / Associates
- Recipients of the Group mailings

Employees and Job Applicants please refer to your specific Privacy Notice respectively held on our intranet and website.

We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures

g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep the following personal data: -

- Contact details
- Other personal data you provide to the Group
- Data concerning your visit to our website

C) COLLECTING YOUR DATA

You have or will in future provide several pieces of personal data to us directly. It enables us to contact and communicate with you, perform marketing activities and improve the quality of our service.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

Data maybe processed in connection with a justified interest of the Group, for example business and administration matters, compliance and legal matters, effective communications, quality improvements or direct marketing, in the latter case, an opt out is always offered.

E) WHO WE SHARE YOUR DATA WITH

Employees within our Group who have access to your data which is relevant to their function behave professionally, confidentially and follow appropriate rules of conduct to ensure data is processed in line with GDPR.

We may also share your data with third parties as part of a Group sale or restructure, or for other reasons to comply with a legal obligation upon us. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

To provide our services, it may be necessary to transfer your personal data outside the European Economic Area. We have put measures in place to ensure that your data is transferred securely and that the bodies who receive the data that we have transferred process it in a way required by EU and UK data protection laws.

F) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

G) RETENTION PERIODS

We will not retain your personal data any longer than is necessary to achieve the purpose for which it was intended and for complying with statutory retention periods.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent although this may impact the level of service we are able to provide to you in future.

H) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it
- b) the right of access to the data we hold on you. We operate a Subject Access Request procedure and all such requests will be dealt with accordingly
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected
- d) This is also known as 'rectification'
- e) the right to have data deleted in certain circumstances. This is also known as 'erasure'
- f) the right to restrict the processing of the data
- g) the right to transfer the data we hold on you to another party. This is also known as 'portability'
- h) the right to object to the inclusion of any information
- i) the right to regulate any automated decision-making and profiling of personal data

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact dataprotectionofficer@cockett.com

I) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint by submitting the Data Breach Form to our data protection officer.

J) NOTICE IS SUBJECT TO CHANGE

The Group reserves the right to amend or alter this Privacy Notice, if for examples there are changes in legislation.

K) USE OF GOOGLE ANALYTICS

The Group uses Google Analytics to obtain insight into, inter alia, visitor flows and traffic sources. This means that Google acts as a Processor in the Group's processing of personal data.

Information collected with Google Analytics is anonymised to the extent possible.

The information obtained is stored by Google on servers in the United States. Google may provide your information as statutorily obliged to do so, read Google's Privacy Policy for further details.

L) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:

Director - Group Support Services
dataprotectionofficer@cockett.com
Office: +971 4 425 5110

Version Control:

Version	Date	Reason	Owner
V1	May 2018	New procedure	DGSS
V2	March 2021	New format	DGSS