

# PRIVACY POLICY

For the purpose of this privacy policy 'we' means Orwell Offshore Ltd.

This privacy policy explains what personal information we collect, how we use it and how individuals can check and update any of personal information.

## Where do we get your information?

We mainly collect your information from you when you contact Orwell Offshore, whether that be at an exhibition, by making an enquiry online, supplying commodities or when making a purchase with the company.

We also collect information from other sources, including business directories and other commercially or publicly available sources. If we collect personal information about you from another source than from you, we will tell you about the source in our next communication with you.

## What type of information is collected from you?

The personal information we collect might include the following:

- Your first and last name;
- Your email address;
- Your company name;
- Your business phone number;
- Your location:
- Your job title;
- Type of industry within which your company operates;
- Your IP address;
- Your interests relating to our products and solutions;
- Information regarding what web pages and downloads you have accessed and when, which emails you have opened and when.

## How we use your information

We collect and process your personal information for the purpose of providing you with marketing information and other communications on the products and services offered by us, in order to increase our business opportunities with you or the company you represent.

## **Automated profiling**

We use automated profiling to analyse your personal information to create a profile of your professional interests and preferences so that we can contact you with information relevant to you. By submitting a form on the website of campaign landing pages you will enter our database where



we will tailor communications and target is based on the demographics or marketing preference information you provide.

From here we will also collect intent data such as email clicks, form submissions, visits to our website and use a mixture of this profile and engagement information to determine whether you have a current interest in our solutions.

We also make use of additional information about you when it is available from external sources such as, but not limited to, Google Analytics.

#### Consent

We rely on your consent in order to handle your personal information. Should you wish to withdraw your consent, you can do so at any time by contacting us at <a href="mailto:enquiries@orwelloffshore.com">enquiries@orwelloffshore.com</a> or by clicking the 'unsubscribe' link in any of our communications to you.

### How long will we keep your personal information?

We will retain your information for the period necessary to fulfil the purposes outlined in the privacy policy unless a longer retention period is required or permitted by local law to which we are subject. We are using the following criteria to establish our retention period: (i) as long as we have an ongoing relationship with you (either as an individual or in your capacity as employed by one of our corporate customers, suppliers or co-operations partners); (ii) as required by legal obligations to which we are subject (such as tax and accounting obligations); and (iii) as advisable in light of our legal position (such as applicable statues of limitations).

If you have not opened any of our email communications over a 24 month period your contact details will be deleted from our marketing database.

### How to check and update your information

To check what information we handle about you, you can email <a href="mailto:enquiries@orwelloffshore.com">enquiries@orwelloffshore.com</a>

You have the right to request information about the categories of information concerning you that we are processing and how they are being used by contacting us in written form using the contact details below. You can also contact us should you want your personal data corrected, updated, deleted or restricted in any way. In certain situations, you also have the right to object to the processing of your personal data and request that your personal data be transmitted in an electronic format. For the protection of your privacy and your personal data, we may require that you identify yourself in connection with such a request.

#### **Marketing Communications**

If you don't want us to send you relevant offers, news or marketing information, email: enquiries@orwelloffshore.com with your preferences.



### Contact information of the controller of your personal information:

Corporate Services Manager Orwell Offshore Limited Orwell Landing Ipswich Suffolk IP2 8NJ

### Sharing data

We may disclose your information to external parties, such as vendors and service providers processing your information under the instructions of Orwell Offshore. Where such disclosure entails transfers of your information outside the EU/EEA, we will ensure that the European Commission Standard Contractual Clauses have been entered into between the transferring entity and the receiving external party. Alternatively, other safeguards will be put in place prior to such transfers.

We will not sell your personal information to third parties.

#### Security

We will ensure that the access to your information is accurately secured by applying appropriate safeguards, depending on the circumstances, taking into account the state of the art, the costs of implementation and the nature, scope, context and purpose of processing as well as the risk. In support of the commitment, we have implemented appropriate technical, physical, and organizational measures to protect your information against; unauthorized or accidental destruction, alteration, or disclosure; misuse; damage; theft or accidental loss; unauthorized access.

#### **Complaints**

If you are concerned about how we handle your information, you have the right to lodge a complaint to the competent data protection authority. Information on how to reach the UK data protection authority can be found at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

#### Contact us

If you have any questions related to the information above, if you suspect that a breach of this privacy policy has occurred, if you would like to obtain a copy of the safeguard mechanisms put in place to protect your information in case of any transfer of the information outside the EEA, or if you would like to contact us for any other reason, please e-mail us at <a href="mailto:enquiries@orwelloffshore.com">enquiries@orwelloffshore.com</a>

Richard Ayling

Richard Ayling
Managing Director
March 2023

Jemma Lewis Gemma Lewis

Corporate Services Manager March 2023