

DATA PROTECTION POLICY

This policy explains how Orwell Offshore Holdings Limited and its UK and overseas subsidiaries are keeping the personal information it collects safe.

Principles

Anyone processing personal data must comply with the enforceable principles of good practice.

Personal data shall be:

- Processed lawfully, fairly and in a transparent way.
- Collected for specified, explicit and legitimate purposes, and processed in a way that is compatible with those purposes.
- Adequate, relevant, and limited to what is necessary to conduct the purposes.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes for which the personal data are Processed.
- Kept secure and protected as much as is reasonably possible against unauthorised / unlawful processing and against loss or damage; and
- Processed in accordance with the data subjects' rights.

Orwell Offshore will comply with each of these principles.

What Type of Information is Held?

The personal information we collect may include the following:

- Your name(s) and postal addresses.
- Your email address and next of kin details (where applicable for Orwell employees).
- For Orwell employees your career history and qualification certificates.
- Identification documents such as passports & bank account details (where applicable).
- Your company name.
- Your phone number provided for business use.
- Your location.
- Your job title.
- Type of industry within which you or your employer operates.
- Your IP address.
- Your device information.
- Your interests relating to our services and solutions.
- Information regarding what web pages you have accessed, and when and where.

Keeping Details Secure

Orwell Offshore stores information on a secure infrastructure protected by the latest encryption and firewall technology. These systems are periodically audited by internal and external security assessors to ensure all infrastructure is secure.

Security

Orwell Offshore will ensure that the access to your information is accurately secured by applying appropriate safeguards, depending on the circumstances, 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 organisational measures to protect your information against unauthorised or accidental destruction, alteration, disclosure; misuse, damage, theft, accidental loss or unauthorised access.

Collected data will be stored within secure electronic records management systems, with the system being dependent on the nature of information. Orwell Offshore will use a correspondence recording system. The system is used to process and store supporting information such as correspondence, PDF files, drawings, tenders, or associated documentation.

Business Continuity Planning

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Using processes and system recommendations, an implementation plan, and an Information Technology and Security Incident Response Plan, which provides step-by-step instructions on what to do should an adverse event occur.

Richard Ayling

Richard Ayling
Managing Director
February 2024

Gemma Lewis

Gemma Lewis
Corporate Services Manager
February 2024