

Orkney Ferries Ltd Privacy Notice

This Privacy Notice is relevant for anyone sharing their personal data directly or indirectly with Orkney Ferries Ltd ("Orkney Ferries", "we" or "us") when visiting our websites or using our services, including by post, telephone or mobile, in person, via social media or when you otherwise communicate with us. Orkney Ferries Limited is a private limited company registered in the UK and as such, we adhere to the General Data Protection Regulation - Regulation (EU) 2016/679, the Data Protection Act 2018 and the Privacy & Electronic Communications Regulations (PECR) 2003.

Our address is **Shore Street, Kirkwall KW15 1LG**. With regard to data protection matters, we are happy to receive your questions or concerns by email info@orkneyferries.co.uk. In this Privacy Statement, we explain what types of personal data we process and for what purposes. We also explain the rights you have in relation to our processing and how you can learn more about our processing and exercise your rights.

Scope of this Privacy Notice

Please note that this Privacy Notice concerns the processing of personal data for which Orkney Ferries is the data controller, i.e. where Orkney Ferries has decided the purposes and means of the processing. For the avoidance of doubt, this Privacy Notice does not concern any processing of personal data that Orkney Ferries may conduct as a data processor on behalf of another Data Controller.

Personal Data Processed

Personal data refers to data that relates to you. We collect and process the following types of personal data related to you:

- Identity details such as your name.
- Contact details such as e-mail address and phone number.
- Vehicle details
- Financial details, such as card payment details in accordance with the Payment Card Industry Data Security Standards (PCI DSS)
- Information generated as a result of your use of our services. Such information may include IP address, device and browser type and also information about how you interact with our services.
- Plus other information we receive from you through your contact with us.

Purposes of Processing

We will only process your personal information where we are satisfied that we have an appropriate legal basis for doing so. We process personal data for the following purposes:

In the context of contractual obligations

- To provide our services in accordance with relevant terms and conditions.
- Administration of the business relationship with you.
- Where necessary for our legitimate interests
- To provide you with information about our services.
- For purposes which are required by law
- Other processing necessary to comply with regulatory obligations that apply to our business

Where you give us consent

- In some contexts we may ask for consent to process your information, for example consent to be added to a mailing list.

Data Protection Principles

Your personal data shall be:

- Collected and processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and kept up to date.
- Kept in a form which permits identification of data subjects for no longer than is necessary.
- Stored in a manner that ensures appropriate security of the personal data.

Data Sharing

We will only share your personal information with third parties in very limited circumstances. We share personal data with third parties who process your personal data on our behalf for the purposes explained above, for example banks and payment providers.

We are also legally obliged to share certain data with other bodies e.g. HMRC and will do so where the law requires this; Orkney Ferries will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and proportionate.

For the avoidance of doubt, we will not share personal data with third parties in a manner that enables such third parties to use personal data for direct marketing purposes in relation to you as a private individual.

Orkney Ferries will not transfer personal data outside the UK or the EEA (European Economic Area) unless this cannot be avoided. To ensure the transfer is legal and

safe prior to transferring such data we will take other measures. For example using the EU/US Privacy Shield to protect transfer to data processors the USA or by using Standard Contractual Clauses to govern the transfer and processing of personal data involved.

Storage and security of personal information

Orkney Ferries will strive to ensure that personal information is accurate and held in a secure and confidential environment. We will keep your personal information for as long as we are obliged to keep it by law or may need it in order to respond to any questions or complaints or to show that we treated you fairly. We may also keep it for statistical purposes but if so we will only use it for that purpose.

When the information is no longer needed it will be securely destroyed or permanently rendered anonymous. We will only keep your information for as long as is necessary, in line with our retention schedule, when it will be securely destroyed or permanently rendered anonymous

Cookies

Our website uses several cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good experience when you browse our website and allows us to improve our site.

Below are details of the cookies used on the main and booking websites:

Main:

- ASPSESSIONID - automatically added by system and are deleted from the computer when the browser is closed. Helps to manage the current booking session.

Booking:

- ASPSESSIONID - automatically added by system and are deleted from the computer when the browser is closed. Helps to manage the current booking session.
- tportidenc - stores details of the current booking and helps to prevent duplicate bookings.
- of_confirm - helps to manage how the confirmation page is displayed.

Your Data Protection Rights

Under data protection law, you have rights including:

- **Access:** you have the right to ask us for copies of your personal information.
- **Rectification:** you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- **Erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **Restriction of Processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Object:** You have the right to object to the processing of your personal information in certain circumstances.
- **Data Portability:** You have the right to ask that we transfer the personal information you gave us to another organisation, or you, in certain circumstances.

You are not required to pay any extra charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact info@orkneyferries.co.uk or write to us at Orkney Ferries Limited, Shore Street, Kirkwall KW15 1LG if you wish to make a request.

Right to Complain

If you are unhappy with the way Orkney Ferries has processed your personal data you have the right to complain. Any complaints should be addressed to the Data Protection Officer at the address provided above. If the matter is not resolved, you can contact the Information Commissioner's Office.

You can contact the ICO via its website at www.ico.org.uk.

ICO helpline number: 0303 123 1113