1. **Introduction**

This policy sets out the obligations of Crossland Tankers Ltd (“the Company”) regarding data protection and the rights of all interested parties (“data subjects”) in respect of their personal data under the General Data Protection Regulation (“the Regulation”).

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a wide range of personal identifiers such as a name, an identification number, location data, an online identifier, to name but a few. This regulation governs both automated personal data and manual filing systems.

This policy sets out the procedures that are followed by the Company when dealing with personal data as per the GDPR and data protection principles.

The procedures and principles set out herein must always be followed by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

1. **The Data Protection Principles**

This policy aims to ensure company compliance with the Regulation and data principles. The principles are rules with which any party handling personal data must comply.

1. The Company must process personal data lawfully, fairly, and in a transparent manner in relation to~~,~~ individuals.
2. The data is collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; (Note: further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes).
3. The data collected is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
4. The information held is accurate, kept up to date and if found inaccurate, having regard to the purposes for which they are processed, is erased, or rectified without delay.
5. The data held is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
6. The Company takes care to process the data in a manner that ensures appropriate security, protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
7. The Data Controller is responsible for and will be able to demonstrate compliance with the preceding principles. The Company’s Data Protection Officer is **Pearse@crosslandtankers.com**
8. The Company shall keep electronic or written internal records of all personal data collection, holding, and processing, and the legitimate reason for holding, full details found in our Data Retention Policy.
9. As per the requirements of the GDPR guidelines, the Company shall carry out Privacy Impact Assessments (PIA’s) when and as required under the Regulation. The Privacy Impact Assessments shall be overseen by the Company’s Data Protection Officer and will follow the ICO code of practice on how to conduct a PIA.

The Company are aware of the rights of their data subjects as per the regulation and ensure that they are informed and provided these rights, when collecting and processing their data.

The following rights include:

1. Right of access to the information being held.
2. A right to get the information rectified if they find any factual errors recorded; They can request access to their information via a subject access request (“SAR”). The Company is required to respond to this request within one month of receipt. All SAR’s should be forwarded to the Company’s Data Controller.
3. Data Subjects also have the right to have their information erased from the system completely (also known as the ‘right to be forgotten’).
4. The right to restrict processing of their information especially with other third parties.
5. The right to data portability by allowing the data subjects to obtain and reuse their personal data for their own purposes across different services.
6. The right to object to the processing of their information that the Company holds on them.
7. Rights with respect to automated decision-making and profiling.

The Company shall ensure that control measures are taken with respect to the collection, holding and processing of personal data.

All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of the following individual responsibilities and the Company’s responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;

Only those that need access to personal data to carry out their assigned duties correctly shall have access to personal data held by the Company.

1. They shall be appropriately trained to do so.
2. They will be appropriately supervised
3. Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed
4. The performance of those employees and other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed.
5. All employees and other parties working on behalf of the Company handling personal data will be bound by contract to comply with the GDPR and the Company’s Data Protection Policy.

All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that all their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the Regulation;

Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

All personal data breaches must be reported immediately to the Company’s Data Protection Officer.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner’s Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

This policy shall be deemed effective as of the “Created Date” below. No part of this policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This policy has been approved and authorised by:



**Signed:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Date:** 22/04/2022

 Sean McKeown **Review Date:** April 2023

 **(Managing Director)**



Company Reg No: NI018916