UK General Data Protection Regulation (GDPR) Policy

For Planet Ocean Ltd

1. Introduction and Policy Statement

Planet Ocean Ltd ("the Company," "we," "us," or "our") is committed to ensuring the protection of all Personal Data that we process and to providing and maintaining a data protection regime that is compliant with the **UK General Data Protection Regulation (UK GDPR)**, as tailored by the **Data Protection Act 2018 (DPA 2018)**.
This policy outlines the Company's commitment to data protection and privacy and sets out the standards and procedures that must be followed when processing Personal Data.

2. Scope

This policy applies to all employees, contractors, third-party partners, and any individuals or entities processing Personal Data on behalf of Planet Ocean Ltd. It applies to all Personal Data collected, stored, transmitted, or otherwise processed by the Company, regardless of the format (electronic, paper, or verbal).

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3. Data Protection Principles

Planet Ocean Ltd adheres strictly to the seven principles of the UK GDPR, ensuring that Personal Data is:

Principle	Company Commitment
Lawfulness, Fairness, and Transparency	Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
Purpose Limitation	Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.[1]
Data Minimisation[2]	Adequate, relevant, and limited to what is necessary in relation to the purposes for which they[3] are processed.[4]
Accuracy[5]	Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure t[6]hat inaccurate Personal Data is erased or rectified without delay.
Storage Limitation	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.
Integrity and Confidentiality	Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
Accountability	The Company is responsible for, and must be able to demonstrate compliance with, the other six principles.

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4. Lawful Bases for Processing

The Company will only process Personal Data where it has at least one valid **lawful basis** under Article 6 of the UK GDPR. The most common lawful bases relied upon by the Company are likely to include (but are not limited to):

1. **Consent:** The data subject has given clear consent for us to process their Personal Data for a specific purpose.
2. **Contract:** The processing is necessary for a contract we have with the data subject, or because they have asked us to take specific steps before entering into a contract (e.g., fulfilling an order for marine equipment).
3. **Legal Obligation:** The processing is necessary for us to comply with the law (not including contractual obligations).
4. **Legitimate Interests:** The processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the data subject's Personal Data which overrides those legitimate interests.

5. Data Subject Rights

Planet Ocean Ltd respects the rights of individuals regarding their Personal Data. Data subjects have the right to:

1. **The Right to Be Informed:** Regarding our collection and use of their Personal Data (addressed by this policy and our Privacy Notice).
2. **The Right of Access (Subject Access Request - SAR):** To obtain confirmation that their data is being processed and to access their Personal Data.
3. **The Right to Rectification:** To have inaccurate Personal Data corrected or completed if it is incomplete.
4. **The Right to Erasure (The Right to Be Forgotten):** To have their Personal Data erased under certain circumstances.
5. **The Right to Restrict Processing:** To 'block' or suppress the processing of their Personal Data under certain circumstances.
6. **The Right to Data Portability:** To obtain and reuse their Personal Data for their own purposes across different services.
7. **The Right to Object:** To object to processing based on legitimate interests or for direct marketing purposes.
8. **Rights in Relation to Automated Decision Making and Profiling:** Not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects or similarly significant effects.

All requests regarding these rights should be submitted to the Data Protection Point of Contact (see Section 10).

6. Data Security and Retention

Data Security

The Company implements appropriate **technical and organisational measures** to ensure the security of Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage. These measures include:

- Use of strong, unique passwords and multi-factor authentication.
- Encryption of sensitive data where appropriate.
- Access controls on all systems and data repositories (principle of least privilege).
- Regular staff training on data protection and security.
- Regular vulnerability assessments and testing of systems.
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Data Retention

Personal Data will not be kept for longer than is necessary for the purpose(s) for which it was collected. The Company maintains a **Data Retention Schedule** (a separate document) which specifies the maximum retention periods for different categories of data. Once the data reaches its retention limit, it is securely destroyed or anonymised.

7. Data Breach Notification

In the event of a Personal Data breach, Planet Ocean Ltd will:

- **Notify the Information Commissioner's Office (ICO):** We will report a notifiable breach to the ICO without undue delay and, where feasible, no later than **72 hours** after becoming aware of it, unless the breach is unlikely to result in a risk to the rights and freedoms of natural persons.
- **Notify the Data Subjects:** If the breach is likely to result in a **high risk** to the rights and freedoms of natural persons, we will inform the affected data subjects directly and without undue delay.

8. International Data Transfers

Planet Ocean Ltd may, in the course of its business operations, transfer Personal Data outside of the UK. We will only transfer data outside the UK where one of the following conditions is met:

1. The transfer is to a country deemed to provide an adequate level of protection for Personal Data by the UK government (an "Adequacy Regulation").
2. The Company has put in place appropriate safeguards, such as **Standard Contractual Clauses (SCCs)** adopted for use in the UK (the International Data Transfer Agreement or Addendum), binding corporate rules, or approved codes of conduct.
3. The transfer relies on an exception or derogation, such as the explicit consent of the data subject or necessity for the performance of a contract.

9. Governance and Policy Review

Aspect	Detail
Accountability	The Company's **senior management** has overall responsibility for ensuring compliance with this policy and the UK GDPR.
Data Protection Point of Contact (DPPoC)	The Company has designated a DPPoC (or Data Protection Officer, if required) who is responsible for overseeing compliance, handling subject access requests, and acting as the primary contact with the ICO.
ICO Registration	Planet Ocean Ltd will maintain its registration with the ICO as a data controller.
Review	This policy will be formally reviewed at least **annually** and whenever there are significant changes to the Company's data processing activities or to relevant legislation.

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10. Contact Information

If you have any questions about this policy, or our data processing activities, please contact:

Role	Details
Data Protection Point of Contact	*Terence H A Sloane* *Planet Ocean Ltd* Unit 16 Camberley Business Centre Bracebridge Camberley GU15 3DP
Email	*terry@planet-ocean.co.uk*
Telephone	*0845 1081457*

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T H A Sloane
Managing Director

