

## GENERAL DATA PROTECTION REGULATION (GDPR)

Prepared by John McKenzie Operations Director Mamarine.com Llp & Burials at Sea.co.uk 7 March 2018

Reviewed and Updated 07-03-18 - JLM

<b>Awareness</b>	Decision makers and key people in the organisation are aware that the law has changed to the GDPR, and the need to understand and appreciate its impact upon the Limited Liability partnership and its subsidiary ( Mamarine.com Llp & Burials at Sea.co.uk )
	The Key decision maker is identified as John L McKenzie the designated person of influence in the LLP and joint business owner

<b>Information held</b>	Document what personal data is held by Mamarine.com Llp & Burials at Sea.co.uk, and where it came from and who it is shared with.
	<p>Mamarine.com Llp - 99% of personal data comes via email requesting information about boat charters, either as an email or via our web enquiry contact sheet which contains name, email and contact numbers.</p> <p>Burials at Sea.co.uk additional to those listed above receives details of the deceased client's death certificate, freedom from infection certificate, a coroners out of England certificate and the MMO's (Marine Management Organisation) burial at sea licence.</p> <p>Details on emails and later invoices will include full names, contact numbers, email addresses and some company addresses. An annual desk diary has the basic details of each booking covering similar to electronic diary inputs.</p> <p>This data is held on email as company records for the purposes of business records, Tax and VAT return information.</p> <p>The only data that is shared maybe if Mamarine.com /Burials at Sea.co.uk are unable or unavailable to carry out the request we will forward the contact details to a charter business colleague /Funeral Director.</p> <p>The enquirer will be included in such emails.</p>

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<b>Communicating Privacy Information</b>	<p>Review all current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation</p>
	<p>As of March 2018 our only privacy notices were included in our terms and conditions and on our web site notes</p> <p style="text-align: center;"><b>“PRIVACY / SECURITY / PERSONAL DATA GDPR STATEMENT”</b></p> <p>Mamarine.com / Burials at Sea.co.uk respects your privacy. Please bear in mind that any personal information that you submit through forms, letters / emails and similar are not encrypted and therefore may be seen or collected by others. Any such information is sent at your own risk and you should therefore carefully consider its sensitivity before transmitting it. If you have any concerns, questions or comments please email us at <a href="mailto:john@mamarine.com">john@mamarine.com</a> or <a href="mailto:john@burialsatsea.co.uk">john@burialsatsea.co.uk</a></p> <p>Cookies are small text files that can be used by web sites to make a user's experience more efficient.</p> <p>Mamarine.com Llp and Burials at Sea.co.uk do have some non-essential cookies to track website usage, these are not used to identify or track users but to assist with improving site use and access. We will not pass or sell any such data to any other company except where a requirement is made in UK law.</p> <p>Whilst we make every effort to keep the information that you supply directly or in directly secure we would like to remind you aware that the Internet in itself is not a completely secure medium.</p> <p>By using Mamarine.com Llp &amp; Burials at Sea.co.uk web sites you agree to accept this privacy policy and are aware that our policy may change with time. Any changes made to this policy will be reflected on these web pages. By making an enquiry with us, or buying any service from us, you agree to us holding your information on electronic and / or paper file and to us contacting you with future offers, news and product information. You may at any time inform us by email or in writing that you no longer want to hear from us. Your data is stored in accordance with UK law and we will never pass on or sell your information. Our full cookie policy can be found on our webpages with the link at the bottom of each page.</p> <p>CHANGES made March 2018</p> <ul style="list-style-type: none"> <li>• Website will have a cookies information notice with tick box agree to continue</li> <li>• Emails to have a privacy note attached to meet GDPR standards</li> <li>• Issue of new privacy policy 07.03.18</li> <li>• Issue of cookie policy for websites</li> </ul>

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<b>Individuals' Rights</b>	Check procedures to ensure they cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.
<b>Subject Access Requests</b>	Update your procedures and plan how you will handle requests within the new timescales and provide any additional information
	Any requests for personal information held on any individual will be completed within 14 days and may be subject to a £10 administration fee. Applications must be in writing setting out what information is required concerning the person applying or on behalf of whom.
<b>Lawful basis for processing personal data</b>	Identify the lawful basis for your processing activity in the GDPR, document it and update your privacy notice to explain it.
	A new privacy policy was introduced in March 2018 and is available to anyone seeking information by email or via the website link below
<b>Consent</b>	Review how you seek, record and manage consent and whether you need to make any changes. Refresh existing consents now if they don't meet the GDPR standard
	Consents on website cookies will have an opt in button. Personal details collected are outlined within our Privacy statement
<b>Children</b>	You should start thinking now about whether you need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity.
	Children do not make any booking direct with us. Should a booking be for a group of children our policy remains that an adult will confirm all details and bookings and will supply an agreed number of appropriate adults aboard with the group at all times

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<b>Data Breaches</b>	Have the right procedures in place to detect, report and investigate a personal data breach.
	Annual on line security package.
	Any attempts to hack or access our site will be reported to relevant authorities.
	On line cloud based backups in place so upon a serious security breach we can remove the site and reload afterwards with new security pass access codes.

<b>Data Protection By Design &amp; Data Protection Impact Assessments</b>	Familiarise yourself now with the ICO's code of practice on Privacy Impact Assessments as well as the latest guidance from the Article 29 Working Party, and work out how and when to implement them in your organisation.
<b>Data Protection Officers</b>	You should designate someone to take responsibility for data protection compliance and assess where this role will sit within your organisation's structure and governance arrangements. You should consider whether you are required to formally designate a Data Protection Officer. Mamarine.com Llp & Burials at Sea.co.uk have designated the Operations Director of the LLP currently – John McKenzie
	Data Protection compliance remains with the company owners and is the designated person of influence (Companies House) John McKenzie, No other staff employed.

<b>International</b>	If your organisation operates in more than one EU member state (i.e. you carry out cross-border processing), you should determine your lead data protection supervisory authority. Article 29 Working Party guidelines will help you do this
	Mamarine.com Llp & Burials at Sea.co.uk do not operate outside the EU and only operate in the UK