

Privacy Statement: <i>Passenger information</i>	Reference:	PO 05-24
	Issue date:	31/01/2024
	Effective from:	01/03/2024

1. Purpose

The Company takes its responsibilities towards data protection seriously & strives to meet or exceed the legal requirements for data handlers in Wales. As an organisation, we collect & process personal information about customers: this policy explains what data is held, about who, when it is collected, for what purpose, & how it is managed.

2. Scope

This policy relates to the personal information of passengers on all kiosk trips & certain commercial trips.

3. Definitions

Unless otherwise defined in this section, all words have their normal meaning.

Affiliate means a company or person who sells kiosk trips on our behalf.

Commercial trips are all trips managed through FareHarbor that are not kiosk trips, & includes passenger & cargo transport.

Company means the partnership of S. Zalot & R. G. Zalot t/a Starida Sea Services (“we”, “us”, “our”, etc.).

Customer means a person booking a kiosk trip or commercial trip, or purchases a gift card or other similar voucher for a kiosk trip (“you”, “your”, etc.).

FareHarbor means FareHarbor B.V., a private limited liability company incorporated under the laws of the Netherlands & has its office at Vijzelstraat 66-80, 1017 HL Amsterdam, the Netherlands (or such other place as defined in FareHarbor’s Privacy Statement, available at fareharbor.com/legal).

Kiosk trips includes wildlife & sightseeing cruises, fishing trips, & personal & family trips.

Passenger means a customer & any member of the group for which the customer books either a kiosk trip or a commercial trip, whether or not the passenger boards a vessel.

4. Contact details

Name: Gareth Williams

Postal address: Gallows Point, Shed 15 BEAUMARIS LL58 8YL

Phone number: +44 1248 810907

Email address: gareth@starida.com

5. Type of data collected

We currently hold the following information on customers who book direct: name, email address, telephone number.

We currently hold the following information on customers who book via an affiliate: name, email address, telephone number.

Depending on the trip booked, we also hold the following information if provided by the customer: home post code, details of any disability a passenger may have (but only where special assistance has been requested).

Where payment for a trip is processed via FareHarbor, the customer’s payment details are stored encrypted with the booking, with only the card scheme & last 4 digits of the cardholder PAN visible to us.

Where payment for a trip is processed by the company other than via FareHarbor, the card scheme & last 4 digits of the cardholder PAN is included in the merchant receipt provided by the payments processor: these details can be linked to a customer.

Where payment for a trip is processed by an affiliate, no personal details relating to the payment are passed to us.

6. How do we get your personal information & why do we need it

All personal information we hold is provided by you in the process of making a booking.

We need this information in order to manage your booking & provide the activity or services booked.

We are also required under the Merchant Shipping Acts to keep a manifest of all passengers on board a vessel.

Information is provided to us by FareHarbor, or by any affiliate through which you book. Use of your personal information by FareHarbor & affiliates is subject to the privacy policies of that organisation & you are advised to check that organisation's privacy policy for details on how they process your information.

We do not share your information with third parties, except where we are legally or legitimately required to do so.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on to process your personal information are:

Your consent: you can remove your consent at any time, except where another legal basis applies. You can do this by writing to the company at the address or email address listed above.

We have a contractual obligation.

We have a legal obligation.

We have a vital interest.

We need it to perform a public task.

7. How do we store your information

Your personal information is stored securely by FareHarbor.

Passenger manifests are kept in paper form for the period required under the Merchant Shipping Acts, currently the validity of the vessel's current passenger or workboat certificate, plus 5 years.

Card payment receipts are stored with passenger manifests for a period of six months or until 30th April in the following year, whichever is the longer.

Access to FareHarbor is restricted to those of the company's employees & agents who have a legitimate need to access the system. The need for access is regularly monitored & may be withdrawn where there is no current legitimate need.

Paper records are kept securely at the company's offices, with access restricted to those with a legitimate need.

Paper records will be disposed of by cross cut shredding by the company before being recycled by an appropriate waste handler.

8. Your data protection rights

Under data protection law, you have rights including:

Your right of access: you have the right to ask us for copies of your personal information.

Your right to erasure: you have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing: you have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing: you have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. To make a request, contact the company at the address provided above.

9. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the address provided above.

You can also complain to the ICO if you are unhappy with how we have used your data.

Address: Information Commissioner's Office, Wycliffe House, Water Lane WILMSLOW SK9 5AF

Telephone: 030 3123 1113

Website: ico.org.uk

10. Roles & Responsibilities

Day to day management of this policy is the responsibility of the Office Manager.

Overall responsibility for the operation of this policy & the safe storage of any data collected remains at all times with the partners.

11. Review

This policy will be reviewed every two years, unless there is a change in the law relating to data protection or unless there is a change in the company's procedures.

Release	Revision	Issue date	Reason for release & sections revised
1	0	31/01/2024	Initial draft

10. Approval

The originally-signed policy will be kept in the company office, with digitally signed copies available on the company's website.

Stan Zalot, Partner

Richard Zalot, Partner