

# DATA PRIVACY NOTICE

Your privacy matters to **MarineCoordinationServices (MCS)** and when you are using our services it is important that you understand how we will collect and protect your personal data.

If working as a data processor, MCS will be acting on the instruction of its client who is the data controller.

## Who is subject to this notice?

This notice applies to all data subjects whose personal data is processed by MCS.

## Definitions

**Controller** means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by EU or Member State laws, the controller may be designated by those laws.

**Processor** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of a controller.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Personal Data** means any information relating to an identified or identifiable natural person (a "data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

**Sensitive Data** means a special category personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life.

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## The Personal Data We Collect

### Personal Data

MCS collects personal data from data subjects as necessary and for the purposes described in this notice. The personal data collected about you may vary based on the requirements and/or limitations of the country where you work, as well as the requirements of your role. Please note that you will be required to provide personal data as a contractual requirement of your contract. Failure to provide personal data will limit your eligibility to work onsite. Except where restricted by local law, MCS processes the following general categories of personal data:

Personal data includes:

- Name, home address and job title and company information
- Gender, nationality
- Contact information including telephone number, email address
- Certificates relevant to work requirements – photo ID's
- Date of birth
- Emergency contact information
- Security verification checks (e.g. Passport number, NI number and/or other form of unique identifier)

### Sensitive Data

Sensitive data is a special category of personal data that is given extra protection by law and may be processed by MCS. For example, MCS may record your medical information to assess your fitness to work, or to protect your health and safety.

Sensitive Personal data includes:

- Medical information (e.g. allergies, medical conditions where relevant)
- Drugs and Alcohol test results, where permitted by local law
- Data that may identify your race or ethnicity e.g. nationality

This information is required to fulfill the legitimate obligations within the field of either contracting, (client)employment or management of the project.

## Why are we providing notice?

MCS processes personal data and sensitive personal data on behalf of itself and its clients. The personal data MCS processes is essential for its or the client's ability to operate, in order to provide a safe workplace and to adhere to applicable data protection and employment laws. This notice is intended to provide you with information on how MCS will process your personal data. Clients using MCS can use the data in MCS systems for alternative purposes outside of the core processing purposes listed below. For information on these processes please refer to the (client)Controller's privacy notice.

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## Purposes of processing your personal data

We capture and process personal data for the purpose of enabling us and the client to achieve their business interests and compliance obligations including:

- a) data subjects movements used for safety purposes, e.g. in case of evacuation of a site – if applicable
- b) Contact information to be used for planning/manifesting
- c) Certificates to verify competency according to an established training matrix
- d) Dependent personal data (NOK) to be used in case of an emergency.

## How to update your personal data

MCS strives to maintain accurate, complete, and up-to-date personal data. We rely on you to help us maintain accurate personal data about you. If your personal data changes, please contact the Site Administrator as soon as possible.

## How your personal data is protected

MCS is committed to protecting personal data collected from you against the risks of loss or unauthorised use or access. We have implemented reasonable and appropriate technical, physical, and administrative controls to protect such information. We provide heightened security to protect personal data, given the increased risks associated with the loss of such information.

As a general matter, access to personal data is strictly restricted to people who need access for the purposes listed in this notice or where otherwise required by law.

## Legal basis for processing personal data

Our primary legal basis for processing your personal data is our contractual obligation to you and/or our client to whom you or your employer are contracted.

Personal data also may be released to protect the vital interests of data subjects (such as the disclosure of personal data in responding to a security incident or to medical workers in the event of a life-threatening emergency).

Where MCS has an obligation to comply with applicable law, legal or regulatory obligations or regulatory inquiries or requests.

## External Processing of Personal Data

We do not transfer your personal data to any third parties outside of the EEA. The MCS service is hosted by SeaPlanner in the UK.

## Retention

MCS retains your personal data for as long as necessary or as instructed by the client.

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## Your Rights

MCS will observe your legal rights (and on instruction from the Client) with respect to personal data that relates to you. These rights include:

- 1) The right to access personal data
- 2) The right to obtain information about how personal data is stored
- 3) The right to rectify or have inaccurate personal data corrected
- 4) The right to have personal data securely removed or deleted when storage of the personal data is no longer necessary for the defined purposes
- 5) The right to restrict processing of personal data in certain circumstances
- 6) The right to opt out of personal data being shared with other Sites
- 7) Right to object to your personal data being processed
- 8) The right to data portability

Please note that MCS will not disclose to you any information that may compromise the privacy of another individual unless required to do so by law.

If you have questions or concerns regarding the processing of your personal data or wish to exercise your rights under applicable law, please contact our Privacy Officer in the first instance. You also have the right to raise any complaint with the relevant data protection supervisory authority in your country.

## Exercising your rights

To exercise any of your rights listed above please contact our Privacy Officer (contact details on page 5).

## Consent

If (upon explicit request) you consent to sharing your profile across Sites within MCS you may withdraw your consent at any time by contacting our Privacy Officer.

## Your Duties

**Updating your personal data.** MCS strives to maintain accurate, complete, and up-to-date personal data. We rely on you to help us maintain accurate personal data about you. If your personal data changes, please contact our Site Administrator.

**Dependent Personal Data / Next of Kin** MCS may collect personal data for emergency contacts in case you experience a medical emergency at work. If you provide personal data about others, MCS will rely on you (unless otherwise required by law) to communicate to those individuals that you are providing us with their personal data. MCS will respect the privacy rights of those individuals whose personal data you provide us.

**Duty to report.** If you come into possession of personal data regarding another individual that is not strictly necessary for the performance of your duties, immediately contact our Privacy Officer.

# DATA PRIVACY NOTICE

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by MCS or its partners, you have the right to complain to MCS's Privacy Officer.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you does not comply with the regulations.

The details for each of these contacts are:

### **Marine Coordination Services BV**

Madame Curieweg 2 – 4

8501 XC Joure

The Netherlands

mail: [dpo@mcsnl.com](mailto:dpo@mcsnl.com)

### **Supervisory Authority (for the Netherlands):**

Autoriteit Persoonsgegevens

Postbus 93374

2509 AJ, Den Haag

The Netherlands

## Revisions to MCS's Data Privacy Notice

We reserve the right to update this Data Privacy Notice at any time, and any changes we make to our Data Privacy Notice will be posted on this page. If there are any material changes to the way we process personal data, the types of personal data we collect, or to any other aspect of this notice, we will seek to notify you as soon as possible.