

Privacy Notice

Your privacy is important to Setag Yachts Ltd. So, we've developed a Privacy Notice that explains how we collect, record, use and store your information. Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions.

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Who we are

Setag Yachts Ltd ("Setag"/"we"/"our") is a company specialising in the refit / refurbishment of second hand yachts, specialising in Princess Yachts, Sunseeker and Fairline, collectively our "Services".

Trading as Setag.

Company number: 13096558

Address:

Plym House 3 Longbridge Road, Marsh Mills, Plymouth,
Devon, United Kingdom, PL6 8LT

Email: admin@setagyachts.com

Who this Notice applies to

This Privacy Notice tells you what to expect when we collect personal information from you as a data subject. It applies to information we collect about our clients and website users.

Data we collect from you

As a customer, we collect information from you when you visit our websites or premises, attend boat shows and other marketing events, purchase something from us, enquire in person about our products (motor yachts, luxury boats, parts and accessories) or services, contact us by telephone, email or other means, or respond to a communication from us. We may also receive information about you from the relevant vessel manufacturer. The provision of information to us is largely voluntary; however, if you do not provide us with Transaction information or Preference information, we may not be able to fulfil your order or provide you with updates.

We also collect data on our staff.

We may collect, store and use the following personal data about you:

- Full name
- Contact information including email address and telephone number
- Address
- DOB
- Copy of passport, Driving Licence, National ID
- Copy of utility bill
- Nationality
- Occupation
- Country of residence
- Gender & age
- Website usage data including Cookies
- Other information relevant to client enquiries
- Bank details
- Bank account details and tax status information
- Yacht name, address & identification number
- Crew members names and contact information
- Photography individual and yacht
- Distributor or broker information
- Health and Safety data: Clothing and shoe sizes
- Your marketing preferences, your account settings including any default preferences, any preferences we have observed, such as the types of offers that interest you, or the areas of our website that you visit.
- Any voluntary information you provide us with, such as hobbies and interests, and responses to surveys.
- Details of your online browsing activities on our website, such as the pages, products or areas of our website that you visit, or which link has brought you to our website from our email communications or third-party websites.
- This information may be identifiable to you because you are logged in to your account, or because we have collected details of your IP address or the device that you have used to access the website. This may also give us the geographic region which your device reports that you are located in.
- CCTV footage at our premises.

Why we collect this data

The personal data we collect will be used for the following purposes:

- Complying with legal obligations. Diligence
- Replying to enquiries about our Services.
- Legal obligations (e.g. Health and Safety requirements)
- Sending you quotations, order confirmations, receipts or invoices.
- Resolving disputes, calculating and collecting fees, and troubleshooting problems.
- Customising your experience, analyse usage of our website, improve and measure interest in our products and Services, and inform you about updates to our Services.
- Providing you with information that may affect your use of our website.
- Providing client service.

- For the professional fulfilment of our Services as instructed by you including working with third parties on your behalf.
- To pass on your details to trusted third parties as required.
- For our own internal records.
- Customising our website for you.
- Providing you with information on similar Services.
- For security and safety purposes
- To take payment from our clients.
- Consent to send direct marketing material
- To notify you of any new services/new stories etc. (Email subscription from Mailchimp)

How we use your data and our lawful basis for processing

Clients:

We hold the contact details of our clients, so that we can perform our contract with our client and provide support on our Services, as well as being able to manage the relationship with our clients, such as billing and other management information. We may also need to take steps at your request prior to entering into a contract with you. Where appropriate, we share these with trusted third parties. Please see below under the heading "Who might we share your data with?" for more information.

The legal basis for this processing is the performance of a contract between us and our client and/or taking steps, at a client's request, to enter into such a contract.

We use details of your payments to us and your order/booking confirmations for our book and record keeping and for tax purposes. The legal basis for this processing is to comply with our legal obligations.

We will store client payment details for the purpose of processing payments.

Website users:

Website users can submit enquiries and join our mailing list online via the on our website. We will use the personal data that you provide us with to respond to your query, this will initially be via email using the email address you have provided us with.

We will use the personal data that you provide us with to respond to your query via telephone or email using the email address or contact number that you have provided us with.

The legal basis for the above processing is the performance of a contract and/or taking steps, at a website user's request, to enter into such a contract.

Cookies are small text files that are placed on your computer when you visit a website. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Our website uses cookies. If you are concerned about security, you can modify your browser to prevent cookies being stored on your machine. You can adjust the settings on your computer to decline any cookies if you wish. This can be done within the "settings" section of your web browser. From there you can block all cookies from this website and its external serving vendors or use the cookie control system if available upon your first visit.

Such data may be processed for the purposes of analysing the use of our website and Services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and Services.

Marketing:

Upon receipt of any marketing-type of communication that is not for use in our commercial relationship and general communication, you will have the opportunity to opt-out of future

communications by clicking an unsubscribe link or by following the unsubscribe instructions described within the communication or otherwise notifying us at via email using the following email address: marketing@setagyachts.com

Who we may share your data with

We will treat your personal data confidentially and may disclose or share your data in certain circumstances when necessary to provide our Services or conduct our business operations, as outlined in our purposes for processing. The following third parties may receive your personal data for the following purpose(s):

- If you are a client we may share your data with the below details, to fulfil our Services and agreement with you.
- Service providers who provide IT and system administration services for the purpose for IT support and administration.
- Professional advisers including lawyers, bankers, auditors and insurers if and when required for legal reasons.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or assets.
- When you provide personal information to one Setag Group company it may be shared with other Setag Group companies. This enables us to run our business effectively and to provide you with an efficient service.
- If your geographic needs would be better served by one of our authorised sub-dealers, with your permission we will pass on your information to that sub-dealer or broker.
- In order to make certain services available to you we sometimes share your data with trusted third parties.
- If your enquiry leads to the purchase of services your information will be shared with the relevant manufacturer/component supplier for warranty registration and safety recall purposes. If you purchase a used vessel with an insurance backed warranty your information will be registered with the insurer.
- To ensure that the data that we hold remains up to date, we periodically cleanse our databases using consumer credit reporting agencies to check our contact information.
- We may use third party service providers such as events management companies, call centres and mailing houses to support our marketing activities. We may also use service providers in less direct ways, such as in the provision of our payment and finance systems, or fraud verification.
- We have agreements with our service providers which restrict how they are able to process your personal information and require them to keep it secure. If any service provider is based outside of the European Economic Area, we will ensure that the provider is either a current subscriber to the EU/US Privacy Shield, or we have an appropriate contract for the international transfer of personal information with them.
- Our website also contains scripts from third party affiliates who will gather Observed information about you in order to verify referrals from third party advertising. We do not process this information but it is collected directly by them and processed in accordance with their privacy policies. For a list of affiliates, please see our Cookie Policy.
- We may share any of your personal data with a prospective purchaser of all or any part of our business, on the basis of our legitimate interests and the interests of our purchaser, so that they can appropriately value the business and assess any risks and continue doing business with you after the acquisition.
- We may share your name and email address with Mail Chimp as and when required, please refer to their Privacy Policy for further information: <https://mailchimp.com/legal/privacy/>

How long we retain your data for

We will only retain your personal data for so long as is necessary to fulfil the purposes we collected it for, including for the purposes of contract/order and satisfying any legal, accounting, or reporting requirements.

For tax purposes the law requires us to keep basic information about our clients (including contact details, identity, financial and transaction data) for six years after they are no longer our clients.

What happens if you don't provide us with the data

If the provision of personal data is deemed necessary for the contract/agreement between us and you there may be possible consequences of failing to provide the personal data. For example, if we do not have the personal data requested from you we may be unable to communicate with you or provide you with the Services that you have requested.

How we keep your personal data safe

We have technical and organisational measures in place to ensure that your personal data has the appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

In addition, we limit access to your personal data to those employees and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Your rights

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

1. **Right of access** – You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. You have the right to request a copy of the information that we hold about you and providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data within one month of your request.
2. **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete. The information we hold will be accurate and up to date. You can check the information that we hold about you by e-mailing us. If you find any inaccuracies we will delete or correct it promptly.
3. **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
4. **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing. Those conditions are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

5. Right of portability – you have the right to have the data we hold about you transferred to another organisation. This right only applies to personal data that you have provided to us, where the processing is based on your consent or for the performance of the contract and when processing is carried out by automated means.

6. Right to object – you have the right to object to certain types of processing only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims. If you object to direct marketing we will cease to process your personal data for this purpose.

If you wish to enforce any of your rights listed above please email us or write to us using the contact details under “Who we are”.

All of the above requests will also be forwarded on should there be a third party involved in the processing of your personal data (as identified under “Who we may share your data with”).

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority using the contact details below.

UK’s Supervisory Authority:

Address: Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Email: casework@ico.org.uk

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time. You should check this page occasionally to ensure you are happy with any changes to this Notice.

We may notify you of changes to this Notice by providing you with a new Privacy Notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information.