

KEELSON MARINE ASSURANCE LLC PRIVACY POLICY

INTRODUCTION

As a provider of online assessments, Keelson Marine Assurance LLC (Keelson) takes data privacy very seriously and understands that personal data is private and that any use of such data needs to follow data protection principles and applicable law.

To this end, below are the details of our “Privacy Policy” which outlines our procedures on the collection and use of personal information.

This Privacy Policy sets out what personal data we collect and process about you in connection with the services and functions of Keelson; where we obtain the data from; what we do with that data; how we comply with the data protection rules, who we transfer data to and how we deal with individuals’ rights in relation to their personal data. Any personal data is collected and processed in accordance with UK and EU data protection laws.

All our employees and contractors are required to comply with this Privacy Policy when they process personal data on our behalf.

Please note that we may disclose individuals’ information to trusted third parties, eg hosting providers, for the purposes set out and explained in this document. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with UK and EU laws on data protection.

We are not responsible for the content or the privacy policies for any websites to which we provide external links. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the Privacy Policy whenever you visit the site to make sure that you understand how any personal information you provide will be used.

DATA PRIVACY LEGISLATION, DATA CONTROLLERS AND DATA PROCESSORS

Data protection provides rights to individuals with regard to the use of their personal data by organisations, including Keelson. UK and EU laws on data protection govern all activities we engage in with regard to our collection, storage, handling, disclosure and other uses of personal data.

Compliance with the data protection rules is a legal obligation. In addition, our compliance with the data protection rules helps individuals to have confidence in dealing with us and helps us to maintain a positive reputation in relation to how we handle personal information.

The applicable rules are contained in the EU General Data Protection Regulation (EU Regulation 679/2016), the UK Data Protection Act 2018 and the United Kingdom General Data Protection Regulation (the “GDPR”).

- “Data Controllers” are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed, who/which make independent decisions in relation to the personal data and/or who/which otherwise control that personal data.
- “Data Processors” are people who or organisations which hold / process personal data on behalf of and for the purposes specified by the Data Controller.
- “Personal Data” means any information relating to an identified or identifiable natural person.

For the purposes of the GDPR, except when stated otherwise in this Privacy Policy, Keelson is acting as a Data Controller.

DATA PROTECTION PRINCIPLES

The eight data protection rules (also known as the data protection principles) that apply to our organisation are that:-

1. We must process personal data fairly, lawfully and transparently. This obligation includes that we must have a valid legal basis for our processing of personal data whether the consent of the person has been given, or that the processing is necessary for our legitimate interests (as long as these interests do not outweigh the rights of data subjects) or some other legal basis set out under the DPAs or (when applicable) the GDPR). It also means that we must be transparent with individuals about our processing of their personal data.
2. We can only collect personal data for specified, identified and legitimate purposes.
3. We can only then process the personal data that we have collected for the purposes which we have identified or for purposes that are compatible with the purposes that we have identified.
4. The personal data that we collect and process must be adequate, relevant and limited to what is necessary for the purposes.
5. The personal data that we collect and process must be accurate and (where necessary) kept up to-date.
6. We must not keep personal data any longer than is necessary, bearing the purpose for which we collected it. This includes that we should keep personal data in a form which permits identification of the data subject for no longer than is necessary.
7. We must keep personal data safe and secure from unauthorised access, deletion, disclosure or other unauthorised uses. This includes not just keeping data safe and secure from persons outside our organisation, but also from people within our organisation who have no need to access or use the personal data. We must also be careful when transferring personal data outside the European Economic Area (“EEA”, being the EU plus Norway, Liechtenstein and Iceland) or the UK, and make sure that we have a valid legal basis on which to transfer that data. Transfer can include using a cloud server that is located outside the EU/UK or allowing people who are located outside the EEA/UK access to personal data that is stored within the EEA.
8. We must comply with data subjects’ rights of information about, and (separately) access to, their personal data and with their other data protection rights, including rights to correct or erase their personal data, rights “to be forgotten”, rights to object to processing (including profiling), rights against automated decision-making and (under the GDPR) rights to data portability.

PERSONAL DATA SECURITY

We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if they agree to comply with those procedures and policies, or if they put in place adequate measures. In addition, we have appropriate written agreements in place with all of our data processors.

We maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

- Confidentiality means that only people who are authorised to use the data can access it.
- Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.
- Availability means that authorised users should be able to access the data if they need it for authorised purposes.

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. Keelson uses third party vendors and hosting partners to provide the necessary hardware, software networking, storage, and related technology required to run our application. The data you provide to us is protected using modern encryption, intrusion prevention, and account access techniques.

INFORMATION WE COLLECT

WHAT PERSONAL DATA WE COLLECT

When a candidate is enrolled, we collect various information such as name, company name, email address, vessel, role and rank.

HOW WE MAY USE PERSONAL DATA WE COLLECT

We may use this Personal Data to perform the services requested. This data processing is necessary to provide or fulfil a service requested by or for you / your organisation.

We do not use this Personal Data for marketing purposes.

We will not share your personal data with any third party for marketing purposes.

RETENTION OF PERSONAL DATA WE COLLECT

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for and for up to seven (7) years afterwards or otherwise permitted by applicable laws. We may also retain your information during the period of time needed to complete our legitimate business operations, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

CONSENT TO USE OF PERSONAL DATA WE COLLECT

When you agree to be enrolled on Keelson's DP CPD Programme you agree to us using your data to provide or fulfil a service requested by or for you / your organisation.

You can always choose not to provide this personal information. If you choose not to provide essential information you might not be able to receive the service or information that you request.

If you do not want to receive communications from us, please follow the unsubscribe instructions at the bottom of the emails you receive, which are clearly marked (this method is the quickest way to expedite your unsubscribe request). Alternatively, you may submit a request by sending an email with details to info@Keelsonmarine.com.

In registering your details with us you will be asked to consent to our processing of your personal information as described above. You may withdraw consent at any time by contacting us as described in this Privacy Policy. Withdrawal of consent shall be without effect to the lawfulness of processing based on consent before its withdrawal.

WHAT NON-PERSONAL DATA WE COLLECT

Like most online services, we gather statistical and other analytical information collected on an aggregate basis relating to all users. This non-personal data comprises of information that cannot be used to identify or contact you. Information collected may include your browser type and language, or the city or region or country from which you accessed our services, as well as the ways you interact with our services, such as pages visited, time spent on pages, the number of clicks and the domain names. We may also use third-party analytic providers and technologies, including cookies and similar tools, to assist.

The information collected from cookies in your Web browser includes standard information from you (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Keelson website (such as the Web pages viewed and links clicked).

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognise your browser and help us to track visitors to our site. A cookie contains your contact information and information to allow us to identify your computer when you travel around our site for the purpose of helping tailor the experience to meet your needs. Most web browsers automatically accept cookies, but, if you wish, you can set your browser to prevent it from accepting cookies. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. The cookies we use do not detect any information stored on your computers.

Certain information in relation to web usage is revealed via our internet service provider who records some of the following data. The information we receive depends upon what you do when visiting our site:

- The logical address of the server you are using.
- The date and time you access our site.
- The pages you have accessed and the documents downloaded.
- The previous Internet address from which you linked directly to our site.
- Some of the search criteria you are using.
- How We May Use Non-Personal Data We Collect Via our Website

We use this non-personal usage information to operate and improve our Website, to improve the information we are supplying to our users, to find out how many people are visiting our sites and for statistical purposes. Summary statistics allow us to assess the number of visitors to the different sections of our site, discover what information is most and least used, inform us on future design and layout specifications, and help us make our site more user friendly.

We process this information given our legitimate business interest to improve the Keelson website and our customer's experience with it.

Cookies enable us to improve our service to you and to provide certain features that you may find useful. We also use cookies to monitor customer traffic patterns and site usage to help us develop the design and layout of the websites.

This software does not enable us to capture any personal user's information. Aggregate cookie and tracking information may be shared with third parties.

We will make no attempt to identify individual visitors, or to associate the usage / technical details listed above with any individual. We will only use this information for statistical and other administrative purposes. You should note that usage / technical details, which we cannot associate with any identifiable individual, are not "personal data" within the meaning of the GDPR.

ACCESS AND OTHER RIGHTS THAT YOU HAVE REGARDING PERSONAL DATA WE COLLECT

You may request access to your personal information in order to review, correct or delete any personal information Keelson retains about you by:

- sending an email request to info@Keelsonmarine.com
- send a request by post to Data Privacy, Keelson, 11211 Katy Freeway
- Houston
- Texas 77079
- For queries specifically relating to UK-GDPR, please contact our UK Representative:
- Kate Gillespie
- kate@Keelsonmarine.com
- +44 (0)7788833759

In your request, please clearly state what personal information you would like to have access to. Keelson will respond to requests within 30 days.

EU residents have rights to access personal information stored about them and to limit its use and disclosure. This includes the right to request access to and rectification or erasure of personal information or restriction of or objection to processing, as well as the right to data portability and to withdraw consent to processing of personal information.

Keelson shall address such requests in accordance with applicable data protection laws.

RETENTION OF DATA WE COLLECT

Keelson retains personal information for as long as is necessary to provide its services which includes prudent, limited duration archive retention, for compliance with legal obligations, to enforce our rights under agreements and as permitted under applicable data protection law. Retention periods will therefore reasonably vary based upon the nature of the personal information involved.

INFORMATION COLLECTED WHEN YOU TAKE AN ASSESSMENT

An assessment may consist of a test, exam, quiz, survey, or other kind of assessment. Keelson provides assessment services via TestReach.com. [Please click here for TestReach's GDPR Policy.](#)

Keelson's customers are the companies or organisations or individuals that enrol on a Keelson assessment programme. Keelson is the Data Controller and Keelson is the Data Processor in respect of the processing of personal information described above.

When you take an assessment on the TestReach system, the Keelson may collect, receive or store personal information including question responses and Keelson will derive an assessment score and

Keelson uses the above information for its internal business purposes (such as maintaining and improving our products), to correspond with you regarding the issue and to improve the support experience. For example, we may use information provided in interactions with our support personnel to improve our help documentation. All personal information received as part of the support process is treated in the same way as information for people taking assessments.

ACCESS AND OTHER RIGHTS THAT YOU HAVE REGARDING ASSESSMENT-RELATED DATA

Keelson stores personal information. If you want to receive access to, limit the use of, or limit disclosure of, your personal information received by Keelson as part of an assessment process administered contact us.

DISCLOSING INFORMATION TO OTHERS

Keelson does not sell or rent personal information (including your email address) it collects to others; however, it may disclose personally identifiable information in the following situations and where applicable in compliance with and limited by the requirements of the Privacy Shield principles, EU and Swiss data protection law and other commitments made by Keelson to good privacy practice:

- in response to a subpoena, court order or legal process, to the extent permitted and required by law;
- to protect your security or the security of other persons including for national security or law enforcement purposes, consistent with applicable law;
- in connection with a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Privacy Policy and provided that the third party only uses your personal data for the purposes that you provided it to us.
- when you request it, for instance if you have asked us to do this as part of an effort to connect you with experts who can help you.

By providing us with your personal information, you give your consent for your personal information to be transmitted in the situations outlined above. You may withdraw this consent at any time by contacting us as described in this privacy notice.

AGGREGATION AND QUALITY ASSURANCE USE

Keelson may from time to time use assessment or personal information collected, for the purposes of maintenance and operation of services provided to you, including for internal quality assurance purposes, for instance to ensure that new releases of software behave as expected.

Keelson has a formal data security policy that keeps track of any such data and carries out internal exercises to ensure that it is not misused.

Keelson may statistically aggregate data in non-person specific form, and subject to applicable law use this data for operations management, quality control, security and marketing purposes and to improve the quality of our future products and services

By using our services or taking assessments, you give consent for such use. Except where our use does not require consent under applicable law, you may withdraw your consent to such use at any time by contacting us as described in this Privacy Policy.

CHANGES TO THIS PRIVACY POLICY

From time to time, we may need to update this Privacy Policy. We reserve the right to do so by updating this Privacy Policy which will be pointed to from our Website. The “last updated” date at the top of this page will be modified to show that a change has been made.

When the changes are material, we will also inform you in advance of any changes taking effect in our newsletter and/or otherwise prominently positing a notice of such changes or by directly sending you a notification of changes.

We stand behind the promises we make, and unless required by law will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers. We encourage you to review this privacy policy periodically for any changes or updates.

ENFORCEMENT

Keelson is committed to working with individuals to obtain a fair resolution to any complaints or disputes about privacy and personal information.

Keelson carries out periodic self-assessments to verify that its privacy policy and practices are implemented as described and will take such actions as may be required to address any compliance failures. Please contact us if you have any questions or concerns regarding this Privacy Policy or our practices.

If you have any questions, complaints or concerns about this Privacy Policy please contact us as outlined at the end of this Privacy Policy.

For information collected regarding residents of EU member states and Switzerland, Keelson agrees to cooperate with the EU Data Protection Authorities and Swiss Federal Data Protection and Information Commissioner in resolving any individual complaints or disputes with regard to this privacy policy, applicable EU data protection law and Switzerland’s applicable data privacy laws. Individuals in respect of which personal information has been transferred to the United States from the EU or Switzerland may report privacy complaints to their local EU Data Protection Authority or the Swiss Federal Data Protection and Information Commissioner, including if Keelson fails to respond within the timescales referred to in this privacy policy or if our response does not address your concerns.

IF YOU HAVE ANY QUESTIONS OR CONCERNS ABOUT THIS PRIVACY POLICY OR HOW WE HAVE HANDLED YOUR PERSONAL DATA, PLEASE CONTACT US BY:

- sending an email request to info@Keelsonmarine.com
- sending a request by post to **Data Privacy, Keelson Marine Assurance LLC 11211 Katy Freeway Houston Texas 77079**
- or calling Keelson on **+44 (0)77788833759**
- For queries specifically relating to UK-GDPR, please contact our UK Representative:
- Kate Gillespie
- kate@Keelsonmarnine.com

If we are unable to satisfactorily deal with your concerns, you should contact the bodies referred to above. Unless stated otherwise in this Privacy Policy or required by law, we will respond within 30 days.