



Kilrush Maritime Ltd.,  
Kilrush, Co. Clare.  
Phone 065 9052072  
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Email [info@kilrushmarina.ie](mailto:info@kilrushmarina.ie)

## DATA PROTECTION POLICY

The following information is being provided to you, as set out in the General Data Protection Regulation (GDPR) and is intended to inform you of how the personal information you are providing/have provided will be used, by whom and for what purposes at Kilrush Maritime Ltd.

### What personal data does the Kilrush Maritime Ltd. collect for its berthholders?

The Kilrush Maritime Ltd. holds the personal data of its berthholders which includes the following:

- Name;
- Address;
- Contact details;
- Details of any boat held;

(Collectively referred to as the “**Customer Data**”)

While the name and address of the Customer is required in order to hold a berth at Kilrush Marina, the remaining Customer Data is only collected if you voluntarily submit this data to the Kilrush Maritime Ltd.

### Why Kilrush Maritime Ltd. collects Customer Data

The Customer Data is collected for the purpose of: -

1. Processing applications for berthholders;
2. Processing and maintaining records of the berthholders of Kilrush Maritime Ltd.;
3. Managing and administering your berthholdership;
4. Communicating with berthholders including the renewal of berthholdership;
5. Providing any products or services or information requested by you;
6. Registering you for events organised by the Kilrush Maritime Ltd. to include races, galas and any other events.
7. Furnishing the berthholder with a door swipe for access to the Kilrush Maritime Ltd.’s buildings, and for maintaining a record of entry to the buildings.

### Legal Basis for Processing your Customer Data

- **Compliance with a Legal Obligation:** Where it is our legal obligation under applicable law and regulatory requirements to use your personal information in order to comply with legal requirements imposed on us.
- **Performance of a Contract:** It is necessary for us to process your Customer Data to perform our obligations in accordance with the Berthholdership Terms and Conditions. The Kilrush Maritime Ltd. cannot maintain the berthholdership of a berthholder without holding and processing this Customer Data.
- **Legitimate Interests:** It is in our legitimate interest to process your Customer Data for the following reasons:
  1. To provide you with the services under the Berthholdership Contract which you have instructed us to deliver.
  2. To comply with applicable law or regulatory requirements.
  3. To respond to any queries that you have submitted to us.
- **Consent:** We process your Customer Data once we have obtained your consent to do so in order to send you marketing emails and our e-newsletter (this consent may be revoked at any time).

## **Sharing of Customer Data with Third Parties**

- The Customer Data of Kilrush Maritime Ltd. berthholders is not shared with any third parties, only where it is required by law and where applicants for berthholdership and berthholders have expressly consented to the Kilrush Maritime Ltd. sharing their data.

## **Security of Customer Data**

The security and accuracy of the Customer Data is important to Kilrush Maritime Ltd.. Kilrush Maritime Ltd. intend to protect all Customer Data collected.

### **i. CCTV**

Please note that the Kilrush Maritime Ltd. operates a CCTV system throughout the premises both internally and externally.

From time to time, as required by law, personal data (i.e CCTV images) relating to the berthholders and moorings or berths at the premises are held and processed in accordance with the law (e.g for the investigation of a crime by the Gardaí). The CCTV system is operated by the Kilrush Maritime Ltd. with authorised personnel only having access to these recordings.

Warning signs have been placed on the premises to inform all persons entering onto the premises of the existence of the CCTV system.

The CCTV system is in operation 24 hours each day, every day of the year, except for periods of breakdown or necessary maintenance.

This information is processed for the purpose of: -

- a. Security
- b. The prevention and detection of crime

The lawful basis for the processing of your Customer Data above (CCTV) is keeping employees and Berthholders safe and secure by preventing crime and ensuring compliance with health and safety procedures. CCTV images are stored on a hard drive located in the Kilrush Maritime Ltd.'s premises for approximately one month, before they are erased.

For further information regarding CCTV, please see the Kilrush Maritime Ltd.'s CCTV Policy which is available in the Kilrush Maritime Ltd.'s Data Protection Policy.

### **i. Photographs / Videos**

From time to time, the Kilrush Maritime Ltd. will hold events for Berthholders where photos/videos may be taken of berthholders by a photographer engaged by the Kilrush Maritime Ltd. A berthholder's photo/video may be shared on the Kilrush Maritime Ltd. Facebook page, the Kilrush Maritime Ltd. website, on posters and on the TV monitor within the Kilrush Maritime Ltd.'s premises or may be included in the electronic magazine which is made available to berthholders.

Any berthholder may request the removal of their photo/video at any time from our web services. Please contact the Marina Manager to make such a request.

### **1. Financial data**

From time to time, Kilrush Maritime Ltd. may be required to process a payment at your request. Kilrush Maritime Ltd. will require your financial data to process such a payment for a product or service. Kilrush Maritime Ltd. does not retain this data and it is immediately destroyed once the payment has been processed.

## **Retention of Customer Data**

Kilrush Maritime Ltd. will retain and process your Customer Data for as long as you are a Berthholder of the Kilrush Maritime Ltd. and for a period of **five** years from the date of the expiration of your berthholdership.

Thereafter your Customer Data will be deleted by the Kilrush Maritime Ltd. and will no longer be retained.

## **Retention of Other Data**

- **CCTV Recordings:** CCTV recordings will be maintained for a period of one month of being recorded before they are destroyed. This is subject to the personal data being processed as is required by Statute (i.e Gardaí investigation) and in that case the data will be retained for as long as is necessary for an investigation to conclude and the prosecution of any offence for which that personal data may be required as evidence.

## **Rights of an individual Data Subject**

As a data subject and in accordance with the applicable Data Protection Laws in this jurisdiction, has following rights:

1. rights to access, rectification, erasure and portability of the personal data (in certain circumstances)
2. rights to restriction of, or objection to, processing of their personal data (in certain circumstances);
3. rights to withdraw consent at any time (if consent is used as the lawful basis of the processing)
4. right to move your information- we can share a copy of your personal data held with another organisation on your request.

Should you wish to make a request in relation to a, b, c and/or d above, please contact the Marina Manager.

- **Email:** [info@kilrushmarina.ie](mailto:info@kilrushmarina.ie)
- **Telephone:** 0659052072
- **Address:** Kilrush Marina, Merchants Quay, Kilrush, Co. Clare.

## **How can I raise a complaint?**

You have a right to complain to the Office of the Data Protection Commission in relation to the processing of your personal data ([www.dataprotection.ie](http://www.dataprotection.ie)).

All enquires that you have in relation to data protection issues should be addressed to the Marina Manager.

## **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on Jan, 2020.