
PRIVACY POLICY

BACKGROUND:

Sevseas International Ltd understands that your privacy is important to you and that you care about how your personal data is used. [We] respect and value the privacy of everyone who visits this website, www.sevseas.com (“[Our] Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with [our] obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of [Our] Site;
“Cookie”	means a small text file placed on your computer or device by [Our] Site when you visit certain parts of [Our] Site and/or when you use certain features of [Our] Site. Details of the Cookies used by [Our] Site are set out in Part 12, below; and
["Cookie Law"]	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;]

2. Information About [Us]

[Our] Site is [owned and] operated by Sevseas International Ltd, a limited company [registered in England under company number 06855642].

[Registered address: Harrow Business Centre, 429-433 Pinner Road, Harrow, HA1 4HN, London.]

[Main trading address:] Harrow Business Centre, 429-433 Pinner Road, Harrow, HA1 4HN, London.

[VAT number: GB972845185.]

[Data Protection Officer: Ms Nishma Khetani

Email address: nishma@sevseas.com

Telephone number: +44 (0) 2033724183.

Postal address: Harrow Business Centre, 429-433 Pinner Road, Harrow, HA1 4HN, London.]

[Representative: Ms Namrita Chhabra-Lakhlani

Email address: namrita@sevseas.com

Telephone number: +44 (0) 2033724183.

Postal address: Harrow Business Centre, 429-433 Pinner Road, Harrow, HA1 4HN, London.]

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of [Our] Site. [Our] Site may contain links to other websites. Please note that [we] have no control over how your data is collected, stored, or used by other websites and [we] advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which [we] will always work to uphold:

- a) The right to be informed about [our] collection and use of your personal data.

This Privacy Policy should tell you everything you need to know, but you can always contact [us] to find out more or to ask any questions using the details in Part 11.

- b) The right to access the personal data [we] hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by [us] is inaccurate or incomplete. Please contact [us] using the details in Part 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask [us] to delete or otherwise dispose of any of your personal data that [we] hold. Please contact [us] using the details in Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to [us] using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if [we are] relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to [us] directly, [we are] using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask [us] for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. [We] do not use your personal data in this way.]

For more information about [our] use of your personal data or exercising your rights as outlined above, please contact [us] using the details provided in Part 13.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data [we] hold about you changes, please keep [us] informed as long as [we] have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about [our] use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

[We] would welcome the opportunity to resolve your concerns [ourselves], so please contact [us] first, using the details in Part 13.

6. What Data Do You Collect and How?

Depending upon your use of [Our] Site, [we] may collect and hold some or all of the personal [and non-personal] data set out in the table below, using the methods also set out in the table. Please also see Part 12 for more information about [our] use of Cookies and similar technologies. [We] do not collect any [‘special category’ or ‘sensitive’ personal data] **AND/OR** [personal data relating to children] **AND/OR** [data relating to criminal convictions and/or offences].]

Data Collected	How [We] Collect the Data
[Identity Information including full name, email address, contact number, company name and company website.]	Using the “contact us” form on our website https://sevseas.com/contact/ and/or through website analytics and/or through any phone or email contact that you make directly with us.

7. How Do You Use My Personal Data?

Under the Data Protection Legislation, [we] must always have a lawful basis for using personal data. The following table describes how [we] [may] use your personal data, and [our] lawful bases for doing so:

What [We] Do	What Data [We] Use	[Our] Lawful Basis
We use your data to keep you updated with our material offers, marketing emails and any company news and updates.	Email address and contact telephone number.	Your legitimate interest in our products AND/OR services which you may have expressed either using the contact us form on our website or through other forms of communication such as email, telephone or face to face.

[With your permission and/or where permitted by law, [we] may also use your personal data for marketing purposes, which may include contacting you by [email] **AND/OR** [telephone] **AND/OR** [text message] **AND/OR** [post] with information, news, and offers on [our] [products] **AND/OR** [services]. You will not be sent any unlawful marketing or spam. [We] will always work to fully protect your rights and comply with [our] obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.]

[We] will only use your personal data for the purpose(s) for which it was originally collected unless [we] reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If [we] do use your personal data in this way and you wish [us] to explain how the new purpose is compatible with the original, please contact [us] using the details in Part 13.

If [we] need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, [we] will inform you and explain the legal basis which allows [us] to do so. In some circumstances, where permitted or required by law, [we] may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. **How Long Will You Keep My Personal Data?**

[We] will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

9. **How and Where Do You Store My Personal Data?**

[[We] will [only store your personal data] in the UK. This means that it will be fully protected under the Data Protection Legislation.]

The security of your personal data is essential to [us], and to protect your data, [we] take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where [we are] legally required to do so;

10. **Do You Share My Personal Data?**

[[We] will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

[If [we] sell, transfer, or merge parts of [our] business or assets, your personal data may be transferred to a third party. Any new owner of [our] business may continue to use your personal data in the same way(s) that [we] have used it, as specified in this Privacy Policy.]

In some limited circumstances, [we] may be legally required to share certain personal data, which might include yours, if [we are] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

[[We] may sometimes contract third parties to supply certain [products] **AND/OR** [services].

If any of your personal data is shared with a third party, [we] will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, [our] obligations, and the third party's obligations under the law, as described above in Part 9.]

[If any personal data is transferred outside of the UK, [we] will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.]

[If [we] sell, transfer, or merge parts of [our] business or assets, your personal data may be transferred to a third party. Any new owner of [our] business may continue to use your personal data in the same way(s) that [we] have used it, as specified in this Privacy Policy.]

In some limited circumstances, [we] may be legally required to share certain personal data, which might include yours, if [we are] involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.]

11. **How Can I Access My Personal Data?**

If you want to know what personal data [we] have about you, you can ask [us] for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover [our] administrative costs in responding.

[We] will respond to your subject access request within [10 working days and, in any case, not more than] one month of receiving it. Normally, [we] aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date [we] receive your request. You will be kept fully informed of [our] progress.

12. How Do You Use Cookies?

[[Our] Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by [us] and are used only by [us]. [We] use Cookies to facilitate and improve your experience of [Our] Site and to provide and improve [our] [products] **AND/OR** [services]. In addition, [Our] Site uses analytics services which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling [us] to better understand how people use [Our] Site.

13. How Do I Contact You?

To contact [us] about anything to do with your personal data and data protection, including to make a subject access request, please use the following details [(for the attention of Ms Namrita Chhabra-Lakhlani)]:

Email address: namrita@sevseas.com.

Telephone number: +44(0) 203 372 4183.

Postal Address: Harrow Business Centre, 429-433 Pinner Road, Harrow, HA1 4HN, London.

14. Changes to this Privacy Policy

[We] may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if [we] change [our] business in a way that affects personal data protection.

Any changes will be immediately posted on [Our] Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of [Our] Site following the alterations. [We] recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 20/06/2023.