



# HUMAN RIGHTS AT SEA

## Privacy Policy

### Introduction

This website (“the Site”) is provided by Human Rights At Sea (“HRAS”) [www.humanrightsatsea.org](http://www.humanrightsatsea.org) and hosted in the United Kingdom under English laws.

HRAS is a private not-for-profit organization with its head office at 9 Bedford Row, WC2R 4AZ. HRAS is registered as a data controller with the UK Information Commissioner's Office ("ICO") for the purpose of the Data Protection Act 1998. HRAS is committed to protecting and respecting your privacy.

Any reference to Human Rights at Sea (“HRAS”) within this page should be taken to include its Founder, CEO, Directors, Trustees, Collaborative Partners, Supporting Entities, design and content developers and associated third parties within its ambit. The words "we", "us" and "our" in this and our other policies referred to below should be understood to mean "HRAS" and/or the other persons described in this paragraph.

This policy together with our **Terms of Use** and any other documents referred to in it, including our **Cookie Policy** sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following policy carefully to understand our views and practices regarding your personal data and how we will treat it.

This policy applies to any personal data collected from you during your usage of this Site as well as any communication with HRAS through any other channel (including, but not limited to, email, letters, phone calls, facsimile or in person).

By visiting the Site you accept and consent to the practices described in this policy.

### Your Agreement

This Privacy Policy is valid from the date at the top of the policy. Please note that by using this Site, you agree to this Privacy Policy. If you do not agree with this Privacy Policy, please cease using the Site and our materials immediately.



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## Variations to Policy

HRAS reserve the right to revise this Privacy Policy from time to time. Any such changes will be posted online. Please check this page frequently to take notice of any changes we make, which will be legally binding on you. By using the Site, you agree to be bound by such amendments from the date on which they are posted on the Site. If you do not accept such amendments, you should cease using the Site immediately. However, you may reserve the right to opt-out of receiving notifications from us should you wish to do so.

## Information we may collect

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by submitting information and documentation to the Site including, amongst other things, when you: submit an inquiry or Missing Seafarers' Report Form; sign an online petition; correspond with us by e-mail, telephone or otherwise; subscribe to our mailing list; participate in discussion boards or other social media functions on the Site; follow or communicate with us on social media outlets; submit information or documentation through any other of our online portals, or when you report a problem with the Site.

The information which you give us may include, but is not limited to:

- names;
- addresses;
- e-mail addresses;
- phone numbers;
- personal descriptions;
- identification document details;
- photographs;
- employment information;
- any other information you provide to us.

Please note that if you make a donation to HRAS or the MSRP via a link on the Site, your data will be collected and processed by a third party donations manager, which will transfer to us your data excluding your payment card details. This third party has its own Privacy Policy and Terms and Conditions. It is your responsibility to check these policies.

- **Information we collect about you.** On each of your visits to the Site we may automatically collect the following information:



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- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We do not knowingly collect personal information from anyone under 13 years old. If you are under 13 years old, please do not provide us with any such information, or ask your parents for permission.

- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive). We may receive any of the above types of information from other sources, including from law enforcement agencies, charities and relevant service providers.

### **Cookies**

The Site makes use of cookies, which are small text files stored on your computer or mobile device by our server, in order to improve your user experience and to distinguish you from other users. For more detailed information on the types of cookies that we use and the purposes for which we use them please see our **Cookie Policy**.

You can set up your computer to refuse cookies by turning them off in your browser. To find out more about cookies or how to delete cookies in your browser, please visit: [www.aboutcookies.org](http://www.aboutcookies.org) or see our separate 'Cookie Policy'.

### **Purpose of use of the Information**

We will collect personal information from you in a fair and reasonable manner, and only in accordance with the law of England and Wales. Such personal information will be used only for the following purposes (unless we have obtained your consent or applicable law requires or permits us to process your information otherwise):



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**Information you give to us.** We will use this information:

- To provide you with a personalised service;
- To operate this Site, understand its usage for statistical purposes (e.g. number of Site visits, average time visitors spend on the Site, etc.), and for security purposes;
- To manage and process enquiries, registrations, donations, and other interactions with you;
- To provide you with information which you might request from us, or information about HRAS and/or the MSRP;
- To provide you with information about our services such as through the mailing list and to inform you of other relevant MSRP or HRAS activities, if we have received any necessary consent from you and in accordance with the law of England and Wales;
- Other marketing purposes where you have indicated any necessary consent;
- To share your contact information with our affiliates and relevant third party organisations, provided that you have given any necessary consent to such sharing.
- To share your information with third party service providers for the purpose of (where applicable): processing donations, operating our Site and IT systems, administering our mailing lists, and complying with applicable laws and regulations.
- To publish details of missing seafarers and fishermen on the Site;
- To assist national and international law enforcement agencies in locating missing seafarers and fishermen;
- In legal actions and prosecutions in connection with missing seafarers and fishermen;
- To notify you about changes to our Site or our activities; and
- To ensure that content from the Site is presented in the most effective manner for you and for your computer.

**Information we collect about you.** We will use this information:

- To assist national and international law enforcement agencies in locating missing seafarers and fishermen;



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- In legal actions and prosecutions in connection with missing seafarers and fishermen;
- To administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep the Site safe and secure.

## **Disclosure of your information**

We may share your information with our Trustees, our Founder and with staff or volunteers as necessary in order to fulfil the purposes set out above.

We may also share your information with selected third parties including:

- National and international law enforcement agencies.
- Selected service providers who assist us in realising our purposes, as set out above.
- Analytics and search engine providers that assist us in the improvement and optimisation of the Site.
- We may disclose your personal information to third parties:
  - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our **Terms of Use** and other agreements; or to protect the rights, property, or safety of HRAS, the Site's users, or others. This includes without limitation exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the processing of your details, the investigation of missing persons and liaising with national



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and international law enforcement agencies. By submitting your personal data, you agree to this transfer, storing and processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored and maintained on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

### **Your Rights**

#### **Privacy Preferences**

You may request the deletion, amendment of or addition to the information we have collected from you at any time by contacting us at [enquiries@missingseafarers.org](mailto:enquiries@missingseafarers.org). In order to process your request we will require proof of your identity, and we ask that you give us reasons for your request.

You may subscribe or unsubscribe to any mailing list by visiting the appropriate link in the mailing list email.

If you request that we disclose, modify or delete your information from our databases, or cease to make use of your personal information either temporarily or permanently, we will endeavour to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for record-keeping purposes, and there may also be residual information that will remain within our databases and other records to the extent that such retention is legally required and permitted.

#### **Access To Information**

You may have the right, under applicable law, to access information held about you. Your right of access can be exercised in accordance with English law, subject to any relevant exemptions. Any access request may be subject to a fee.



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## **External Websites**

The Site may, from time to time, contain links to and from external websites, including (but not limited to): news sites, international institutions, non-governmental organisations and other relevant entities, websites of our partner networks, advertisers and affiliates.

If you follow a link to any of these websites, please note that these websites have their own privacy policies. We do not monitor or control the privacy practices of those websites, and are not responsible for their practices or the content of their websites. You are advised to review the privacy policies of such third parties individually. Please check these policies before you submit any personal data to these websites.

## **Security**

We take your privacy very seriously and use reasonable physical, technical and administrative security methods to protect the data that resides on our servers and other files.

However, due to the existing legal, regulatory and security environment, we cannot fully ensure that your private communications and other personally identifiable information will not be disclosed to third parties. For example, third parties may unlawfully intercept or access transmissions or private communications. Additionally, in the event that we need to investigate or resolve possible problems or enquiries we may be required to disclose information about you that may be in our possession to private entities, law enforcement or other government officials if necessary and appropriate.

## **Contact Information**

If you have any questions about this Privacy Policy, including any complaints regarding our handling of personal information, please send an email to [enquiries@humanrightsatsea.org](mailto:enquiries@humanrightsatsea.org)

Thank you for visiting the Site.