

## **Sea Teach Privacy Policy - Storage Policy - Cookie Policy**

Personal information submitted to us will be used for the purposes specified in this policy, on the relevant pages of the website or on the booking form.

### **I. The type of personal information we collect:**

1. We collect certain personal data about the visitors and users of our site.
2. The data we collect when you book a course with us includes the following:
  - First Name & Last Name
  - Address: We request this information for sending certificates, course packs or other orders. We also require an address for invoicing.
  - Phone & Email Address: We request your contact details, so we can contact you regarding the course you have booked with us.
  - Date of Birth, Nationality, Passport/ID Number: We request these data for correctly booking courses, issuing certificates and for invoicing.
  - Payment details as necessary for online or email booking.

### **II. How we collect personal information:**

1. We collect personal information when you provide it to us automatically, as you navigate through our site;
2. We collect personal information when you provide it to us directly via completed course booking forms, by buying services and goods through our website or by sending us emails;
3. We are required to collect emergency contact details and medical details before the start of certain courses, if the course type requires this information to be collected.

### **III. How we use personal information:**

1. To complete a contract, or take steps linked to a contract: e.g. when you purchase a course or goods through our website;
2. When it is necessary for purposes which are in our, or third parties, legitimate interests. These interests include:
  - operating the site;
  - providing you with services described on the site;
  - verifying your identity when you sign in to our site;
  - responding to support requests, and helping facilitate the resolution of any disputes;
  - carrying out technical analysis to determine how to improve the site/ services we provide;
  - monitoring activity on the site, e.g. to identify potentially fraudulent activity
3. For purposes which are required by law: For the purpose of responding to requests from the government, a court of law, or law enforcement authorities conducting an investigation.

#### IV. When we disclose your personal information:

We will disclose personal information to the following recipients:

1. To enable access to your online course: we need to share some of your personal data with the RYA via your user profile in [www.ryainteractive.org](http://www.ryainteractive.org). This learning management website is hosted and maintained by a third party called Learning Pool, who will not use your personal information for any reason other than enabling your course. Your name and email address will be entered on [www.ryainteractive.org](http://www.ryainteractive.org) in order to create your user account. On your first access to the site, you will be asked to enter your address and date of birth. You will have access to the site for one year in order to complete your online course. During this period, your personal information will be held on the website by Learning Pool and be available to this training centre and the RYA for the purpose of managing your course. Instructional support will be provided by this training centre for a period of 1 year from the date of your course booking. On completion of your course, your name, email, date of birth and address will be transferred to the RYA's central database for the purpose of recording details of the course and any certification you gain as a result of it. This information allows the RYA to record your certification, to update any records they may already hold about you or your qualifications and to verify your certificate if required. After one year from the date of your enrolment on the course, your user account will be removed from [www.ryainteractive.org](http://www.ryainteractive.org). Full details of how the RYA will deal with your personal information will be displayed when you first access [www.ryainteractive.org](http://www.ryainteractive.org)
2. When you are awarded with an RYA certificate that needs to be registered online: On successful completion of certain RYA courses, your name, contact details (including address), date of birth, certificate number and date of issue will be shared with the RYA through a secure web portal on [www.rya.org.uk](http://www.rya.org.uk). The data will be stored on the RYA's central database. This information allows the RYA to record your qualification, to update any records they may hold for you, and to verify or replace your certificate if required. For further information on how the RYA will deal with your data, please see the RYA's privacy policy at [www.rya.org.uk/go/privacy](http://www.rya.org.uk/go/privacy);
3. When we register you for an examination by DSV Prüfungsausschuss für Sportbootführerscheine:  
  
To register you for the exam by the DSV, we need to share some of your personal data with the [DSV](#). The DSV has its own data protection policies, which can be found [here](#).  
  
Should not wish for us to share your personal data with the DSV, then please advise us accordingly and we will provide you with all necessary information to do the exam registration yourself and directly with the DSV.
4. Our professional advisers (lawyers, accountants, auditors etc.) who are located in Spain;
5. Regulators and Government authorities in connection with our compliance procedures and obligations (such as Guardia Civil inspecting our booking procedures and training vessels);
6. A third party to respond to requests relating to a criminal investigation or alleged/ suspected illegal activity;
7. A third party, to enforce or defend our rights, or to address financial or reputational risks;
8. Other recipients when we are authorized or required by law to do so.

#### **V. Where we store your personal information:**

1. We are based in Spain, so your data will be processed in Spain. Some of the recipients we have described in section IV. above, and to whom we disclose your personal information, are based outside Spain in particular the RYA in the United Kingdom and the DSV in Germany.
2. We store personal information on secure servers that are managed by our service provider, and on hard copy files that are kept in a secure location in our office. Personal information that we store or transmit is protected by security and access controls, including username and password authentication, and data encryption where appropriate.

#### **VI. How you can access your personal information:**

1. You also have the right to make a request to access other personal information we hold about you, and to request corrections of any errors in that data. You can also close the account you have with us at any time;
2. To make an access or correction request, contact our privacy representative using the contact details at the end of this policy;
3. You are entitled to ask us to port your personal information, to erase it, or restrict its processing. You also have the right to object to some data processing that are in our legitimate interests, such as profiling, which we perform for direct marketing. And, after we have asked for your consent to process your data, you have the right to withdraw this consent [more information on this provided below].
4. When we require your personal information to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage our contractual relationship with you, or to meet obligations placed on us. In all other cases, provision of requested personal information is optional.
5. If you have unresolved concerns you also have the right to complain to data protection authorities. The relevant data protection authority will be the one of the country:
  - of your habitual residence;
  - of your place of work; or
  - in which you consider the alleged infringement has occurred.If you have any questions about our privacy policy or the way in which we have been managing your personal information, please contact our office in writing.

#### **VII. Information you make public or give to others:**

1. If you make your personal information available to others, we can't control or accept responsibility for the way they might use or manage that data. If you're sharing information, this privacy policy will not apply.

#### **VIII. How long we keep your personal information:**

1. We retain your personal information for as long as necessary to provide our services to you and to comply with our legal obligations:
  - After your course has finished, we keep certain personal information that is strictly related to the course and certificate you earn with us. We keep information stored on

our system in case a certificate is lost, stolen or destroyed, this is solely because we want to be able to support you in getting a replacement.

- If you no longer want us to use/store your personal information, you can request that we erase your personal information: If you do not want your details to be stored on our system please let us know, but please be aware that unless your certificate has been registered with the RYA, neither us nor the RYA will be able to replace or verify your certificate if it is lost, stolen or destroyed. Please note that if you request the removal of your personal information, we will retain details from deleted accounts as necessary to comply with the law, and keep data relating to invoices. The information we retain will be handled in accordance with this Privacy Policy.

#### **IX. Personal data request:**

For your personal data request please get in touch with us by email: [email@sea-teach.com](mailto:email@sea-teach.com)

#### **X. Cookies:**

Most websites you visit will use cookies in order to improve your user experience, by enabling that website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie'). Most cookies are harmless and are designed to help your online experience.

If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it, or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block web browser cookies which are set on your device then you can do this through your browser settings; the Help function within your browser should tell you how to do this.

A cookie is a simple text file that is stored on your computer or mobile device by a website's server. Only that server will be able to retrieve or read the contents of that cookie. Each cookie is also unique to each of your web browsers. The cookie will contain anonymous information, such as a unique identifier and the site name and some digits and numbers.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, and generally improving your experience of a website. Cookies make the interaction between you and the website faster and easier. If a website doesn't use cookies, it will think you are a new visitor every time you move to a new page on the site.

Our website also contains content embedded from external social media websites and these sites may also set their own cookies. We use various social media on our website – such as Facebook, LinkedIn and Twitter. This will not affect you unless you click on these links.

Our website has links to other third party websites. Please note that our cookies policy only relates to the cookies that are found on our website and that the management of other websites is outside of our control. However, we will make reasonable attempts to ensure that we are not directing you to visit websites that might use cookies in a disreputable fashion. It is your responsibility to read the cookies policy for every website you visit if you wish to understand how each intends to use them.

You may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this for a wide variety of desktop browsers.

## **XI. Web analytics:**

1. When you visit our website, there's certain data that's recorded, which is generally anonymous information and does not reveal your identity. If you're logged in to your account, some of this data could be associated with you, by this we mean:
  - Your IP address or proxy server IP address (stored for 60 days for security reasons)
  - The domain name you requested;
  - The name of your internet service provider is sometimes captured depending on the configuration of your ISP connection;
  - The date and time of your visit to the website;
  - The length of your session;
  - The pages which you have accessed;
  - The number of times you access our site within any month;
  - The file URL you look at and information relating to it;
  - The website which referred you to our Site; and
  - The operating system your device uses.

## **XII. When we need to update this policy:**

1. We will need to change this policy from time to time in order to make sure it stays up to date with the latest legal requirements;
2. When we do change the policy, we'll make sure to notify you about such changes, when required. A copy of the latest version of this policy will always be available on this page of our site.

## **XIII. Third Party Websites**

1. Our website includes hyperlinks to, and details of, third party websites.
2. We have no control over, and are not responsible for, the privacy policies and practices of third parties.
3. We do not accept any liability for the content of external links. Third parties are solely responsible for their own content.
4. We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

## **Our details**

1. This website is owned and operated by *Sea Teach Mallorca SL*.
2. Sea Teach is registered in Spain under the tax number (CIF) ES B56806169, and our registered office is at Port Petit 208, 07660 Palma, Balearic Islands, Spain.
3. You can contact us:

- by post, using the postal address above;
- using our website contact form;
- by telephone, on (+34) 971 648 429 or (+34) 626 275 264
- by email, using [email@sea-teach.com](mailto:email@sea-teach.com)