

# Privacy Policy

Barton Marine Equipment Ltd. Privacy Policy

In Compliance with General Data Protection Regulation (GDPR) May 2018

Reviewed September 2019

## **Barton Marine: Data Collection, Protection and Control**

Data we collect as a Trade Manufacturer depends on who our services are used by and how they wish to work with Barton Marine. This Policy refers to those using our services, interested business partners or customers, prospects and suppliers. This policy is not applicable to third party users, their websites, products or services. If you disagree with practices described in this policy, then you should take all precautions to remove yourself from using our website, services or products.

When data is received from a business or individual, sometimes an “account” is created as requested by that entity. Sometimes we receive information or data sent to us electronically, and that provided data is stored as requested by the sender, or required for future use. We also receive data from partners in the business such as banking or finance institutions, raw material suppliers, service providers, government, regulatory entities or legal providers, and that information is stored for historical reference or ongoing use. This data is essential information for basic business practices which allows Barton to keep its products and services provided in a safe and regulated manner. All credit or financial information received is only used for the purpose of providing the services requested by the sender.

Data Collection at Barton Marine involves two approaches. Personal Data involves reasonable and specific use of data to identify individuals as customers or suppliers for the business processes required and requested. This can include a person’s name, addresses, phone, contact details, or if a financial transaction is requested, it may involve taking credit card information solely for the purpose of that single transaction. “Other Data” which is collected and does not fall into the category of Personal Data, can be acquired in multiple ways including collection from our Website by interested parties, responses to our advertisements or promotions, transaction data from basic business responses, purchases or projects. Company data is part of Other Data collection and is used and kept for the express requirements of business exercises or transactions.

## **Use of Data**

Barton Marine and our service providers use Personal Data to provide services, detect and prevent fraud, diminish financial losses or other harm to users, customers, suppliers or to Barton Marine. We also use Personal Data at times to promote services, sell, improve or design products or systems for the benefit or interest of our customers and suppliers. This may be exercised by:

- Verifying identity or compliance purposes
- Evaluation of an applicant or credit report for the use or purchase of our products
- Monitoring fraud or harmful activity
- Responding to inquiries or providing customer support
- Processing Payments to Barton Marine
- Regulatory or government requirements or audits
- New product development or communication of design or marketing of product to customers
- Basic business intelligence to keep Barton Marine compliant and competitive in the markets we serve

Barton Marine also uses Other Data for a variety of general business purposes as noted above, but when required by other nations or businesses, we will use this data with the same security as Personal Data.

#### **Data Disclosure**

Barton Marine does not sell, provide, borrow, or give out Personal Data to any other marketers, promoters or third parties other than our trusted service providers or affiliates that aid our own Barton Marine management or business service programs. Personal Data is never provided to other businesses for their own specific sales or marketing efforts unless the individual authorizes and expresses this transfer of data in writing to Barton Marine. Following this request, the data shared is subject to the third party's privacy policy.

For safety, legal or regulatory enforcement purposes, Personal Data may be shared within the confines of the applicable laws that regulate such transfers of information. This may include protecting Barton Marine's rights, privacy, safety or property. It may also include the legal transfer of Data with third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, which may include any bankruptcy or similar proceedings.

#### **Data Security**

Barton Marine has always employed reasonable measures to protect Personal Data and we strive to comply and reach the highest levels possible of securing sensitive information. We keep data in locked confidential files accessible only to those required to manage the issues or transactions involved, and computer files are password-only accessible, by only those finance officers, managers or administrators who need the data for specific business responsibilities. Any known breaches of information will be immediately reported to the ICO regulators and any person who feels that their data may be compromised is asked to contact Barton Marine immediately to investigate and rectify.

Barton Marine may collect, use and disclose certain Personal Data about customers when acting as a service provider. Those we disclose to are responsible for making sure that the customer's privacy rights are respected. This includes appropriate disclosures about third party data collection and use. Barton Marine will process Personal Data in accordance with the terms of our agreement with the user or Personal Data provider and every attempt will be made to do so according to their lawful instructions.

#### **Social Media and Advertising**

Barton Marine makes every reasonable effort to keep data protected on social media sites and in our advertising activities. When you access one of our Barton media sites or our website, the use of "cookies" may be used that are downloaded on browsers to allow your online devices to be recognized, accessed or followed by third parties. It is recommended that anyone accessing our sites ensure firewalls and clean up software are in place to protect their own devices and privacy.

#### **Personal Choice and Data Retention**

Our customers, colleagues and suppliers have the right and option to opt-out of receiving or reviewing information from Barton Marine. We will provide unsubscribe links and features to our news, transactions and promotions. Our services are not targeted at minors and we request that no minors under the age of 16 provide or extend to us their Personal Data. Barton requests that anyone wishing to have personal data or contact information removed from our system, to contact us in writing or by email to require their information to be corrected in our database or removed from our systems. We may still have to communicate legal or reasonable business data with you, but every effort will be made to comply with Personal Data requests from our customers, prospects,

suppliers or dealers. Barton will retain Personal Data for the period necessary to fulfil specific, requested, and/or required business activities. Barton Marine has an obligation to retain some data provided to us including appropriate processing of transactions, settlements, refunds or charges. Also to eliminate fraud and money laundering, according to regulations or laws in specific regions. Some data may be saved to comply with regulatory or lawful financial requirements even if data requests are received to terminate Personal Data in our system.

### **International Data Information**

Barton Marine's services are often provided internationally. All forms of Data may be stored and processed in any country where we have sales activities or where we engage with service providers and network operations. We may transfer Data outside of your country of residence, which may have data protection rules that are different from those of your country. However, we will try to ensure that any such transfers comply with applicable data protection laws and that your Data remains protected to the standards described in this privacy policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data. We ask that you inform us of any new or evolving privacy requirements you have or your governing system requires so we can ensure compliance.

### **Final Notations on Data and Barton Marine's Privacy Policy**

Barton Marine may change this Privacy Policy as required or as necessary and changes will come into effect when a new policy is publically posted on our website. We may also send out new policy changes directly to inform our customers, suppliers, colleagues, interested parties or prospects about changes that need to take place. If you have any questions or comments about the Barton Marine Privacy Policy, please contact us at [info@bartonmarine.com](mailto:info@bartonmarine.com)

You can contact us directly at

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