



## **Irene Partnerships Ltd**

### **Guest Privacy Notice**

This document describes how Irene Partnerships Ltd collects, uses and manages the information it holds about its guests, how the information may be shared and how the confidentiality of guest information is maintained.

We take our duty to protect your personal information and confidentiality very seriously and are committed to taking appropriate measures to ensure it is held securely and only accessed by those with a need to know. We take care to meet our legal and regulatory duties.

The office staff, crew and our partners keep records about your personal details, contact information and medical conditions. These records, which may be written on paper or held on computer, help to ensure that you receive the best possible experience on board Irene.

### **What kind of information is held about you?**

- Personal details, such as name, address, date of birth, next of kin & telephone numbers.
- Contact we have with you, such as voyages booked, enquiries and feedback on your experience.
- Financial information such as bank details, invoices and payments.

### **How we use your personal information.**

In general terms, your records are used to direct, manage and deliver your sailing experience so that:

- The crew can plan an experience which is safe and enjoyable for you.
- The crew can react to emergencies in the most appropriate way.
- The office can fulfil its contractual obligations to you.
- We can understand your experience to allow us to improve our service.

### **When do we share information about you?**

We share information about you with others directly involved in your voyage or experience on board Irene. This includes staff of Irene Partnership Ltd, contractors and partner companies. All people and organisations who have access to your information will have agreed to comply with our policies on protecting your data and will only use it for the purposes outlined by this policy.

More information about how and why we share data is outlined below.

### **Safe and Enjoyable Experience:**

We use the information we hold about you to allow our crew to tailor voyages to individual guests and to with our booking partners to ensure you are sufficiently well to undertake the voyage. We share your information electronically and this will influence whether we accept

your booking, the amount of sailing done each day whilst on a voyage, our planned destinations, our catering and our allocation of cabins and berths.

This will be based on information such as:

- Existing health conditions
- Dietary preferences
- Age and fitness considerations

### **Emergency Situations:**

It is critical for the crew to have access to certain information to ensure they can react in the best possible way to any emergency. We share information provided by you through the booking process to ensure they can take all appropriate steps to protect your safety in such a situation. This is done by secure electronic means. Where required, this information will be shared with emergency services and medical services.

The sort of information this relates to is:

- Existing health conditions
- Medication being taken
- Next of kin information
- Personal details such as name and contact information

### **Fulfilling Contract Obligations**

In order for us to fulfil our contractual obligations in providing your voyage, we will share your contact and booking information with our partner company, who manages Irene on our behalf, and with the crew of Irene. We will use this information to stay in contact with you following your booking to advise of joining instructions and to provide you with your invoice.

We will also use the details to provide such assistance or resolve such queries as may arise between your booking and you joining us for the voyage.

Information we will use includes:

- Names and contact details
- Email addresses
- Phone numbers

### **Service Improvement**

Your enjoyment of the voyage is critical to us. We may contact you once you have completed your voyage for feedback purposes. We will share positive and negative comments with all staff, contractors and partners who may have contributed to your experience.

### **How Long Are Records Retained**

All records are retained in line with their use and our data protection policies. Where legislation requires us to keep data items longer than our policy states, we will comply with the law.

Our general policy is to retain booking records for seven years following the voyage.

Where a booking does not result in a voyage, we will retain the data for a period of 12 months.

## Your Rights

You have the certain rights under the GDPR. These are outlined below:

### **Right to access:**

You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.

### **Right to Rectification:**

You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

### **Right to Erasure:**

You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

### **Right to Restriction of Processing:**

You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Right to Data Portability:**

You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

### **Right to Object:**

You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

### **Right to Complain:**

You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information.

## How you can access your records

You can access your records by making a Subject Access Request. All requests should be made in writing to the Office Manager at the address at the end of this document and accompanied by evidence of your identity.

We will then provide your information as quickly as possible but within one month of receiving your written request. You will need to provide:

- Satisfactory evidence of your identity
- Authority to act on someone else's behalf (if appropriate)

An indication of what information you are requesting to enable us to locate it in an efficient manner.

Whilst no charge is made to you for access to your records please be aware that we can charge a reasonable fee, based on the administrative costs of meeting your request, if a request is

manifestly unfounded or excessive, particularly if it is repetitive. We reserve the right not to respond to your request in those circumstances and if we do, we will let you know why and how you can take the matter further if you wish to do so. An extension to two months for provision of records can be made where requests are complex or numerous.

## **Accuracy**

If you think any information we hold about you is inaccurate please let us know by contacting Data Controller at the address at the end of this document.

## **Transferring personal data outside of the EEA**

In some cases we may transfer your personal data to countries outside the European Economic Area, for example we may use cloud computer programmes where the servers are outside of the EEA.

Where we do so we will ensure that such transfers are compliant with GDPR and that appropriate measures are put in place to keep your Personal Data secure.

## **Data Controller**

The data controller responsible for keeping your information confidential is:

Irene Partnership Ltd  
Bishops Lodge  
Oakley Green  
Windsor SL4 5UL

If you have any queries or concerns please address them to the Chief Privacy Officer at the above or email to [info@ireness.com](mailto:info@ireness.com) where it will be forwarded to the relevant person.