



The International Association of Maritime Institutions

IAMI

Data Protection Policy

| Approved by: | Version: | Issue Date: | Review Date: | Contact Person: |
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| IAMI Directors | Ver 7 | Mar 2024 | Jan 2027 | Secretary, IAMI |

Contents

1. Introduction
2. Data Processing
3. Data protection / GDPR roles.
4. Policy review date.
5. Abbreviations

1. Introduction

This policy complies with UK legislation within the Data Protection Act 2018 and the EU General Data Protection Regulation (“GDPR”) 2018. These Regulations aims to standardise data protection laws and processing across the UK and EU; affording individuals stronger, more consistent rights to access and control their personal information.

<https://www.gov.uk/data-protection>

IAMI are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

IAMI are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation.

2. Data processing

Data Protection – our procedure and processes for data protection are reviewed to ensure it meets the standards and requirements of the Data Protection Act / GDPR and maintain the security of all data held by us. IAMI are committed to using only UK based hosting services.

Cyber Protection. IAMI have a separate policy on Cyber Protection to protect employees and systems from external threats which would compromise our systems and data held on them.

Data Retention – we are required to maintain a database of all certificates issued by IAMI, and only data pertaining to certification validation process will be retained, to ensure we meet the ‘data minimisation’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed compliantly and ethically. The retention of personal data will be maintained until the candidate reaches the age of 70.

Data Breaches – where we suspect, or it is reported to us that a data breach has occurred, then the Data Protection Officer (DPO) appointed by the IAMI Directors will identify, assess, investigate and report this at the earliest possible time. The DPO has a duty to report any data breach to the Information Commissioner’s Office <https://ico.org.uk/for-organisations/report-a-breach/>

International Data Transfers – IAMI members transfer personal data onto the secure and encrypted web based YDES, EKES, GUEST or EPA interface, and hence data storage on site or on personal equipment is not required by members or their staff.

Subject Access Request (SAR) – IAMI can receive requests for individual data held by them, and this pertains to a verification check of certification held

under the YDES, EKES, GUEST or EPA systems. IAMI will respond within 30 days to any such request received in writing.

Privacy Notice/Policy – all individuals who enrol to undertake either an YDES examination, EKES examination, GUEST assessment or EPA assessment are informed that their personal information is used for the purposes of their certification only.

Direct Marketing – IAMI do not, nor will, undertake any direct marketing to people enrolled onto YDES, EKES, GUEST or EPA assessment.

Processor Agreements – IAMI do use third parties to process personal information on our behalf, they are required to comply with their own GDPR / Data Protection Act obligations as a UK company. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the GDPR / Data Protection Act.

Data Subject Rights

In addition to the procedures mentioned above, individuals can enforce their data protection rights, and IAMI will provide, where requested, information about: -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

3. Data Protection Act / GDPR Roles

IAMI Directors have designated the IAMI Secretary as the Data Protection Officer (DPO), and they are responsible for promoting awareness of the Data Protection / GDPR across the organisation, maintaining our Data Protection Act / GDPR compliance, identifying any gap areas and implementing the new policies, procedures and measures.

IAMI will maintain its registration with the Information Commissioner's Office (ICO) through annual subscription.

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For questions and queries about Data Processing or GDPR related matters, please contact IAMI Secretary at secretary@iami.org.uk

4. Policy Review

The effectiveness of this policy will be reviewed every three years considering experience and best practice. This mechanism recognises that changes as a result of experience may prompt a review of the policy before the end of this three-year period.

5. Abbreviations

YDES – Yacht Deck Examination System

EKES – Engineering Knowledge Examination System

GUEST - Guidelines for Excellence in Superyacht Training

EPA – End Point Assessment for England based UK apprentices