

This Privacy Notice sets out the basis on which the Company will process any personal data the Company collects or receives from anybody using our website [www.sparrowsgroup.com](http://www.sparrowsgroup.com). The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

**Data Protection Officer:** The GDPR Steering Committee will assume the responsibilities of the Data Protection Officer. All correspondence should be addressed to [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com)

**Scope:** This Privacy Policy applies to Sparrows Offshore Group Limited (“Sparrows Group”), (“The Company”) and all subsidiary companies.

## 1 WHAT INFORMATION DOES THE COMPANY COLLECT AND HOW IS IT USED?

This privacy notice tells you what to expect when the Company collects and receives personal information. This applies to information we collect about:

- visitors to our websites
- information submitted to us via our contact us form.

When someone visits [www.sparrowsgroup.com](http://www.sparrowsgroup.com) we collect standard internet log information and details of visitor behaviour patterns to find out things such as the number of visitors to various parts of the website. We collect this information in a way which does not identify anyone and we do not make any attempt to find out the identities of those visiting. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will highlight this in advance. We will make it clear when we collect personal information and will explain what we intend to do with it.

When you submit your personal details to us via our contact us form we will use that information to respond to your message. Your message is emailed to the relevant department who will respond directly to you. If your message is a genuine sales enquiry it will be logged in our CRM (Customer Relationship Management) database.

We will only use the data you have submitted via the contact us form for marketing purposes if you tick the relevant box agreeing to this.

We will never sell your information to a third party for marketing purposes.

## 2 HOW DO YOU USE COOKIES?

Cookies are small text files placed on your computer by websites you visit. They are widely used in order to make websites work, or work more efficiently, as well as provide information to the owners of the website.

Cookie	Name	Purpose	More information
ShareThis	_unam	The ‘__unam’ cookie is part of the ShareThis service and monitors “click-stream” activity, e.g. web pages viewed, navigation from page to page, time spent on each page etc. The ShareThis service only personally identifies you if you have separately signed up with ShareThis for a ShareThis account and given them your consent. You can read the ShareThis privacy policy here. This page also explains how you can opt out of the tracking aspects of the ShareThis Service if you wish.	<a href="#">Click here for an overview of privacy at Google</a>
Session Cookie		Joomla session cookie which is used to improve your browsing experience on this website.	
Google Analytics	_ga _gat	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come from and the pages they have visited.	

To find out more about cookies, including how to see what cookies have been set, how to manage them and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites, please visit <http://tools.google.com/dlpage/gaoptout>.

### 3 WHAT ABOUT OTHER WEBSITES YOU LINK TO?

This privacy notice does not cover any websites we link to from this website. For more information about cookies on other websites, please read their respective privacy statements.

### 4 WHO HAS ACCESS TO DATA?

Your information will be shared on a strict need to know basis with:

- companies within the Sparrows Group
- authorized third party agents, service providers and/or subcontractors of Sparrows Group
- a competent public authority, government, regulatory or fiscal agency where it is necessary to comply with a legal or regulatory obligation to which Sparrows Group is subject to.

### 5 HOW DOES THE COMPANY PROTECT DATA?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Data may be transferred outside of the European Economic Area to companies within the Sparrows Group under our Binding Corporate Rules which guarantee an adequate level of data protection wherever your data is physically kept.

Where the Company engages third parties to process data on its behalf, it does so on the basis of written instructions, ensuring the third party is under a duty of confidentiality and obliges the third party to implement appropriate technical and organisational measures to ensure the security of data.

## **6 FOR HOW LONG DOES THE COMPANY KEEP DATA?**

The Company will keep data submitted via the contact us form for a maximum of six months.

If your enquiry was a genuine sales enquiry the Company will hold data for the duration of our contractual relationship with you and for a period of 7 years thereafter as set out in our retention policy.

In some cases, data may be held for a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose).

## **7 YOUR RIGHTS**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request
- require The Company to change incorrect or incomplete data
- require The Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where The Company is relying on its legitimate interests as the legal ground for processing
- ask The Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override The Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Protection Officer. All correspondence should be addressed to [DPO@sparrowsgroup.com](mailto:DPO@sparrowsgroup.com)

If you believe that The Company has not complied with your data protection rights, you can complain to the Information Commissioner.

## **8 WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?**

If you do not provide us with the information required, this will hinder the Company's ability to communicate with you and to manage our contractual relationship efficiently.

## **9 CHANGES TO PRIVACY NOTICE**

We keep our Privacy Notice under regular review and it may therefore change from time to time. This Privacy Notice was last updated on 24<sup>th</sup> May 2018.