



## **Thank you for visiting Ocean Turtle Diving, please take a minute to read our Data Protection and Refund policy:**

*No one likes having their data lost, stolen, damaged, misused or shared without proper consent, so we are doing everything we can to protect you and grow your trust.*

### **DATA PROTECTION POLICY (Fair processing notice)**

In accordance with the GDPR Regulations with effect 25<sup>th</sup> May 2018 we must declare details of how we hold and use your personal data. All data held is compliant with data storage policies.

Legal Basis for holding data:

If you are a current customer we have a legal right to hold your data (for example HMRC require sales data, supplier product recalls, to identify diver certifications for HSE, keeping servicing records for legal compliance). When you are no longer a customer you have a legal right to ask us to forget you, however we must retain some of the above details by law. You as an individual also have personal data rights.

For sales, rentals and air fills, we NEVER pass any of your personal details to any third party. We use your email address in order that our POS system EVE / EVE Agent can send you an environmentally friendly email receipt for any purchases, servicing, rentals or course bookings made. This also acts as your proof of purchase. You will also receive emails through EVE Agent with reminders of servicing due, upcoming courses and trips and events you are entitled to attend as an Ocean Turtle club member (separate to OTD Club Lounge which is the subscription club). You can request to not receive any of these communications at any time, and you have always been able to do this.

For PADI courses, in order to issue your PADI certifications, your details are electronically passed to PADI through their online processing centre in order to issue your certification card.

For servicing, your name only is written on a tag attached to your service item. For non Scubapro or Apeks regs, or for cylinders, these are only passed to trusted third parties who conduct the servicing for us.

We have written confirmation from all our suppliers, including EVE and PADI, that they are GDPR compliant.

Retention period: We will hold your details, unless otherwise requested, for up to 20 years.

We only hold card details for you in two situations – club lounge members who pay a monthly fee (these are held electronically in a fully encrypted system), and rental customers for the duration of the rental period. These are held in paper form, in a locked room, and returned to the customer for safe destruction upon return of rental gear.

You are explicitly opting in to the above policy by providing us with your email address. You can opt out at any time by clicking on the bottom of the emails, or by calling us, emailing us or popping in to see us.