



Isle of Man Steam Packet Company

Privacy Policy

We (Isle of Man Steam Packet Company Limited and subsidiary companies) collect and process data about enquirers and passengers to promote, deliver and improve our services. This privacy policy describes what personal data we collect, how we use that personal data, and how to ensure that our processing meets your expectations.

WHY WE PROCESS PERSONAL DATA

We process personal data about enquirers and passengers before, during and after their travel to support our business interests and legal requirements, which include:

- Providing services to our passengers and recording what services we have provided;
- Managing the health, welfare, safety and security of our passengers;
- Handling enquiries, complaints and investigations;
- Operating passenger accounts and clubs;
- Monitoring and improving the quality of our services;
- Making enquirers and passengers aware of news and offers from Isle of Man Steam Packet Company Limited and our partners;
- Researching and understanding market needs to improve our marketing effectiveness;
- Complying with The Merchant Shipping (Counting and Registration of Persons on Board Passenger Ships) (Amendment) Regulations 2021;
- Complying with the UK immigration Act 1971, paragraph 27B of schedule 2 together with the Immigration and Police (Passenger, Crew and Service Information) Order 2008 (SI 2008/05) and the Immigration (Form and Manner of Passenger Information) Direction 2018.

We also process personal data about job applicants, current and former employees, service providers, travel agents and other groups of individuals in the course of employment and business operations, and this data is subject to our internal Data Protection Policy and sub-policies.

WHAT PERSONAL DATA WE COLLECT

Personal data you provide to us

We collect personal data you provide to us when you enquire, book or sail with us, for example:

- Enquiry: Personal details (name and gender etc.), contact information (home address, country of residence, phone number and email address etc.), details of your interests and communications preferences;
- Booking: Booking preferences, personal details of passengers (name, gender, nationality and date of birth, etc.), contact information, communications preferences, assistance requirements (wheelchair use etc.), financial details (credit/debit card, bank details);
- On-board Activity: Financial details, bookings and billing for on-board services;
- Enquiries & Complaints: Personal details, contact information, enquiry or complaint details;
- Accounts: Personal details, contact information, communications preferences, travel history, hobbies & interests, travel preferences and assistance requirements;
- Manannan Executive Club: Personal details, contact information, communications preferences, travel history;
- Health & Welfare: Medical and mobility details provided to us before, during or after travel;
- Security & Safety: Travel documents, facial photograph/ CCTV, incident reports or witness statements;
- Surveys & Market Research: Responses to surveys and market research surveys;
- Competition entries: Personal details, contact information, details of your interests and communications preferences;
- Supported Travel Requests; Name, contact information, booking preferences;
- Charitable Voucher Requests: Name, contact information;

If you purchase vouchers, we will record your details as needed in relationship to the individual(s) for whom the voucher was purchased.

Personal data generated by your interactions with us

Your interactions with us will result in personal data being created and stored by us.

Examples include:

- Booking: Booking party details, reference numbers, travel itineraries;
- Enquiries & Complaints: Enquiries or complaints and associated investigation and correspondence before, during or after travel;
- Accounts and Manannan Executive Club: Travel history;
- Health & Welfare: Medical reports, welfare reports, correspondence;

- Security & Safety: Accident/incident reports, witness statements, embarkation/disembarkation logs, CCTV recordings, police reports.

Personal data from other organisations

We receive personal data from other individuals or third party organisations. For example, when making a booking we will receive details of all members of the booking party from the person making the booking. We may receive personal data from third party organisations including travel agents processing bookings on a passenger's behalf, from competitions or promotions where personal data has been provided as part of the competition or promotion, or from social media where personal data has been posted on our social media pages.

Sensitive personal data

We do not process sensitive personal data about you except where there is a legal reason to do so. We collect personal data about passenger health as part of the booking processes when it has been indicated that assistance is required.

We process personal data about children when they are passengers on our vessels but do not seek to collect personal data about children for any other purpose.

We may from time to time be asked to process personal data relating to criminal history of individuals, for example if we receive a request from law enforcement authorities, or when investigating security matters that might involve law enforcement.

HOW WE PROCESS PERSONAL DATA

We use personal data with your consent, or where it is necessary in order to:

- Enter into a contract and deliver services for you;
- Comply with a legal duty;
- Protect your vital interests or the vital interests of those around you;
- Satisfy our legitimate interests, except where those interests are overridden by your interests or rights and freedoms.

We will only use personal data about you for the purpose(s) it was collected for or closely related purposes, and will inform you or seek your consent if we need to use it for other purposes.

ENQUIRIES

If you enquire about our services, or engage in competitions or other promotional activities that we or our partners provide, we may ask your consent to provide you with news and offers about our services that you may find of interest. Depending upon your preferences, our communications with you may include:

- Email: We monitor our email communications, including where emails are undelivered and whether or not they appear to have been read. We may cease sending you email communications should we be unable to deliver email to you.
- Calls: Calls made to us, and calls received from us, may be recorded for training, quality and contractual purposes.
- Web: In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies and pixels.

ACCOUNT CREATION AND EMAIL COMMUNICATION

You have the opportunity to create an account by registering with us via our website.

This provides you with the following benefits:

- You can access and amend your bookings 24/7 online and for less.
- You can view your travel history online.
- You will find it quicker to make bookings as your details are stored for future use.
- You can receive our latest news and offers via email if you give your consent.

During the process personal details, contact information, details of your interests and communications preferences are collected and processed in order to provide you with the benefits outlined. After you book, if you do not have an Account with us you will be invited by email to create a Quick Account.

We will ask for your consent to provide you with our latest news, special offers and competitions via email. This consent will also be requested during the booking process and if you enter one of our competitions.

You may withdraw or amend your consent to receive news and offers via email at any time by amending your preference in your Account Details or clicking on the unsubscribe link in one of the email communications.

BOOKINGS

When you make a booking either directly or through a travel agent, we will collect personal data about you and other passengers in your group to effect the booking, including full names, nationality, date of birth, genders, home address, phone, email, details of any assistance requirements, specific preferences relating to the booking you have selected, and your payment details. We need this data to enter into a contract with you. If an email address has been provided you will be sent confirmation of your booking and may also receive a reminder of your sailing arrangements prior to travel via email.

If you provide us with personal data about any other individuals included in a booking, you must have the authority of those individuals to provide their personal data to us for the purposes set out in this Privacy Policy, and will remain accountable for the information provided. It is the responsibility of the booking leader to ensure that personal data about the group members is accurate and up to date.

MANAGING YOUR BOOKING

After you book, if you do not have an Account with us you will be invited by email to create a Quick Account with us.

Before your travel, you will receive information about your booking by post or email. We can use the contact details you share with us to let you know if there are changes to your sailing, or other things happen that might affect your travel plans, like roadworks near to a port you are using.

ON BOARD OUR VESSELS

Your security and safety

We may use personal data about you for the purposes of carrying out security checks. Personal data about you may be shared with recognised law enforcement agencies prior to boarding, during your sailing, or after disembarkation, for security, emergency and immigration purposes. Personal data may also be shared with these agencies in order to prevent and detect crime as well as to safeguard children and vulnerable adults. These checks may involve sending personal data between different countries.

For the safety and security of each vessel and its passengers, and to maintain health and safety, we operate closed circuit television (CCTV) cameras on board our vessels and at certain ports. These are recording continually with footage being retained and stored for a set period. Images taken from these cameras may be used internally for identification purposes and to assist with investigation of safety or security related matters. Images may also be shared with law enforcement agencies (in any jurisdiction) in order to detect or prevent criminal activity or to assist in the apprehension and prosecution of offenders.

While travelling with us

Please be aware that occasionally there are photographers and camera crew on board the vessels taking photographs and making films for our own promotional use or for the use of other companies such as documentary producers. They are happy to take reasonable steps to avoid filming or photographing you where you indicate that this is your preference, but you may be included unless you tell us otherwise and we

are unable to guarantee that you will not be included on an incidental basis.

Some excursions will require us to share personal data with other companies such as a list of names to coach operators.

Your health and welfare

In the unlikely event that you are involved in an accident or require medical treatment on our vessels, we may use personal data already provided to us, or obtained from you, to deliver your treatment. We may share that personal data with third party healthcare providers with your consent or where it is in your vital interests or the public interest to do so, and retain a record of treatment provided for obligatory record-keeping purposes.

AFTER YOU SAIL

Feedback

Upon completion of your sailing, we may contact you to seek feedback on your experience to understand your satisfaction level so that we can improve the quality of services we offer, and to assess the performance of our on board crew.

Queries

Should you have queries before, during or after your sailing, then we will use information related to your sailing such as travel details, billing, on-board communications and other information we may have on record or which you or third parties may provide to us, to resolve your query.

We may also contact you with information following the sailing you have taken, or if there are queries relating to your payment or the services you have received.

UNDERSTANDING YOUR NEEDS

The personal data you provide to us or which we obtain through your dealings with us may be analysed for the following purposes:

- To personalise our news, offers and services to your interests;
- To track the response to our marketing communication;
- To review, develop and improve the services we offer (including market research);
- For statistical analysis.

We may also conduct identifiable and anonymous market research to provide longer-term insight into the effectiveness of our services and marketing, and to support our service planning and delivery.

SHARING PERSONAL DATA

We process personal data about enquirers and passengers at ports in the Isle of Man, UK, Ireland, and on board our vessels.

We contract other companies and individuals to perform certain activities on our behalf. Examples include:

- Processing payments: banks, payment service providers;
- Managing our reservations system: technology partners
- Sending postal mail and e-mail communications: postal services, couriers, e-mail service providers;
- Analysing data: media agencies;
- Advertising and retargeting: platforms like Google Adwords, YouTube and Facebook;
- Providing port services and excursions;
- Providing travel services: coach operators, travel agents.

These contractors have access to personal information needed to perform their functions, but are not permitted to use it for other purposes.

If you make a booking we may pass your personal information on to other relevant suppliers of your travel arrangements such as hotels and transport companies.

We are required by law to co-operate with government and law enforcement agencies and the public authorities.

TRANSFERRING PERSONAL DATA TO THIRD COUNTRIES

We collect and process personal data in the Isle of Man, United Kingdom and Ireland. We do not currently process any data outside of these countries.

YOUR RIGHTS CONCERNING YOUR PERSONAL DATA

You have rights over how we use personal data about you, and can exercise those rights by contacting our Data Protection Officer, Privacy & Data Protection Team, Isle of Man Steam Packet Company Limited, Imperial Buildings, Douglas, Isle of Man, IM1 2BY, or call 01624 645645, or email dpo@steam-packet.com. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal data for compliance with law(s), security, safety, fraud prevention reasons, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

WITHDRAWING CONSENT TO PROCESSING

Where we have obtained your consent for processing of personal data about you, you have the right to withdraw your consent at any time. Where we process personal data about you in ways for which your consent is not required, for example to record your travel history, you may ask us to cease processing, or restrict the nature of the processing, if you wish.

ACCESSING THE PERSONAL DATA WE HOLD ABOUT YOU

You may request a copy of the personal data we hold about you. This can be done by contacting the Data Protection Officer who will provide you with the necessary paperwork to begin the process.

ENSURING THE ACCURACY OF PERSONAL DATA WE HOLD ABOUT YOU

We will update or amend personal data we hold about you if you inform us of inaccuracies. Alternatively, if you hold an account with us you can update your details through our website.

RETAINING AND DELETING PERSONAL DATA WE HOLD ABOUT YOU

We retain personal data for the period required for processing, and where we are under an obligation to do so. We will not hold your data for longer than is necessary and will delete personal data we hold about you if you ask us to do so, except where certain exemptions apply.

HOW TO COMPLAIN ABOUT OUR PROCESSING OF PERSONAL DATA

If you have a concern or complaint about our processing of personal data, please contact our Data Protection Officer, Privacy & Data Protection Team, Isle of Man Steam Packet Company Limited, Imperial Buildings, Douglas, Isle of Man, IM1 2BY, or call 01624 645645, or email dpo@steam-packet.com.

If you are not satisfied with our processing of personal data, how we have responded to your complaint about the processing of personal data, or you believe our processing of personal data is not in accordance with the law, you have the right to complain to:

- Isle of Man Information Commissioner by calling +44 1624 693260 or visiting www.inforights.im
- UK ICO by calling their helpline on 0303 123 1113 or visiting www.ico.org.uk

SECURING YOUR PERSONAL DATA

We take the security of your personal data seriously, and use security policies,

standards, technologies and ongoing training to safeguard the personal data we process from improper access, use, alteration, destruction and loss.

Where we share your personal data with other companies as described above, we require those companies to process your personal data to an equivalent level of security.

WEBSITE

Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies and pixels. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. This does not enable us to collect any personal data. In addition, in order to understand how our customers interact with the emails and the content that we send, we use pixels that allow us to know if the emails we send are opened and if links are clicked on.

Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our website and allow us to provide features such as remembering aspects of your last search to make subsequent searches faster. By using our website, you agree that we can place these types of cookies on your device. More information on how we use cookies and our Cookies Policy can be found [here](#).

Links

We may from time to time include links to other organisations that will enable you to access the web sites of such organisations directly from our site. Each individual organisation operates its own policy regarding the use and sale of personal information and the use of cookies. If you have a particular interest or concern regarding the way your personal information will be used then you are advised to read the privacy statement on the relevant site.

We will try to provide you with links to high quality, reputable sites which we believe will be of interest and relevant to you, but please note that such third party sites are not under our control and we do not contribute to the content of such sites. When you click through to these sites you leave the area controlled by us. We cannot accept

responsibility for any issues arising in connection with either the third party's use of your data, the site content or the services offered to you by these sites.

Security

All traffic to www.steam-packet.com is over https ("Hypertext Transfer Protocol Secure"). This means that all of your data is private, secure and encrypted when using the websites.

As with any standard email, emails containing your personal data sent to or from us will not be encrypted.

HOW TO CONTACT US

The Isle of Man Steam Packet Company Limited is registered in the Isle of Man and England & Wales under numbers 0002092V and FC006682, respectively. The Company is also registered as a data controller with the Isle of Man Information Commissioner and the UK Information Commissioner's Office under numbers N000863 and Z862552X, respectively.

All enquiries relating to data protection, including communications with our Data Protection Officer, should be sent to: Data Protection Officer, Privacy & Data Protection Team, Isle of Man Steam Packet Company Limited, Imperial Buildings, Douglas, Isle of Man, IM1 2BY, or call +44 1624 645645, or email dpo@steam-packet.com.

CHANGES TO THIS POLICY

This policy was last updated on 14 March 2022. When changes are made to this policy, we will publish the changed policy on our website.