

## Data Protection Policy

### Introduction

Orchid Haze Maritime EOD Ltd will monitor its storage and information processes at frequent intervals in accordance with current legislation and to ensure its continued compliance with Data Protection Law. Any information that is found to be materially incorrect will be amended as soon as is practical or destroyed.

### Definitions

The following are provided for to assist in understanding of this policy:

- **Data Protection Law**, includes the General Data Protection Regulation (GDPR); the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.
- **Data**, Facts and statistics collected together for reference or analysis.
- **Protection**, the action of protecting or the state of being protected; a legal or other formal measure intended to preserve civil liberties and rights.

### Process

#### Personal data

Personal Data is data consisting of information that relates to a living individual who can be identified from the information. Personal data includes expressions of opinion about an individual. All personal data must be processed in accordance with Data Protection Law. Orchid Haze Maritime EOD Ltd will ensure that its employees are aware of their requirement to treat personal data appropriately and, where applicable, will treat breaches of its requirements under Data Protection Law seriously, which may include disciplinary action.

In addition, and under Data Protection Law, 6 Alpha and others acting on its behalf, will collect, retain and process information about its employees. The type of information, which may be obtained and stored by 6 Alpha, includes (but is not limited to) dates of birth, sex, health and the commission or alleged commission of any offences. This information will be used for payroll and personnel management purposes in connection with each individual's employment with Orchid Haze Maritime EOD Ltd.

In addition, Orchid Haze Maritime EOD Ltd shall use any data it holds to ensure it can monitor and comply with any current legislation, particularly in terms of equal opportunities and non-discrimination. Where it holds any employee's personal data, it shall check this data from time to time to ensure that it remains accurate. This shall be carried out on a regular basis by contacting each employee to confirm the details held on file. Employees who become aware of a material change to their circumstances, such as their personal details/maiden names/aliases, home address, next of kin or any contact phone numbers, is required to notify the HR Manager as soon as is practical.

Orchid Haze Maritime EOD Ltd may also collect and store data on any other persons associated with the carrying out of its business, or as part of its recruitment and/or training programme.

Wherever possible, any information stored will be verified as correct and will be regularly audited for its accuracy.

## **Data Security, Confidentiality and Privacy**

All data or information sorted or processed on 6 Alpha's systems or transmitted within or from Orchid Haze Maritime EOD Ltd (e.g. e-mail, voice-mail) is the property of the organisation and may be accessed, read or monitored accordingly. Any employee with access to Orchid Haze Maritime EOD Ltd IT resources must ensure the confidentiality and appropriate use of any accessible data, by being aware of the security needs of equipment where such information may be held or displayed, as well as the protection of any access rights, such as passwords. Please refer to Orchid Haze Maritime EOD Ltd's IT Policy for further details.

All employees are required to abide by the privacy rights of all other employees regarding the disclosure of personal information, as required by current legislation. It should also be noted that disclosure of confidential information to unauthorised persons or entities, or the use of such information for self-interest or advantage, is prohibited, as is access to non-public areas of any network drive. Breaches will be treated severely under Orchid Haze Maritime EOD Ltd's disciplinary rules

## **Privacy**

All users of Orchid Haze Maritime EOD Ltd's IT resources are advised to consider the open nature of information disseminated electronically and should not assume any degree of privacy or restricted access to such information. Orchid Haze Maritime EOD Ltd strives to provide the highest degree of security when transferring data but cannot be held responsible if these measures are circumvented and information is intercepted, copied, read, forged, destroyed or misused by others.

Though it is not the intention of Orchid Haze Maritime EOD Ltd to continuously monitor Internet and e-mail communications, or access data files held by an individual, it reserves the right to do so at any time. Orchid Haze Maritime EOD Ltd has the right to read and/or delete any data stored on company owned or leased equipment. All employees must be aware that they therefore have no right of privacy in respect to Internet and e-mail communications, or stored data, utilising Orchid Haze Maritime EOD Ltd owned or leased equipment.

However, it should be noted that 6 Alpha would not normally access an employee's data or communications without first requesting permission to do so. However, in the event of an internal disciplinary investigation, or at the request of a Government Agency, or because of litigation against the individual and/or Orchid Haze Maritime EOD Ltd, any e-mail or data files may be locked and/or copied to prevent destruction and loss of information. In such cases, 6 Alpha may resort to its right to view any data held without first requesting the permission of the individual concerned.

This policy will be regularly reviewed to ensure its effectiveness. Internal control systems and procedures will be subject to audit under the internal audit process.

Signed on behalf of Orchid Haze Maritime EOD Ltd:

Signed

A handwritten signature in black ink, appearing to be 'Craig Tower', with a stylized flourish at the end.

Name: Craig Tower  
Date: 14th February 2024  
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