

Introduction

Welcome to Ocean Culture Life's privacy policy.

Ocean Culture Life ("OCL") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how OCL collects and processes your personal data through your use of our website (<https://www.oceanculture.life>), our social media channels (e.g. LinkedIn, Facebook, Twitter and Instagram), or in connection with our interactions with you. This will include any data you may provide through our website or any information you post or share through our social media channels. It will also apply when you sign up for a newsletter, share your story, become one of our partners, apply for a storytelling grant, make a donation, join one of our expeditions, volunteer with us, attend our events, or purchase our products or services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller, Joint Controller, Processor

Ocean Culture Life is a charity registered in Jersey and Ocean Culture Life Limited, a private limited company, is the controller and responsible for your personal data (collectively referred to as "OCL", "we", "us" or "our" in this privacy policy). In certain circumstances, OCL may also be a joint controller or data processor.

Contact Information and Complaints

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal right], please contact the data privacy manager at: info@oceanculture.life.

You have the right to make a complaint at any time to the Office of the information Commissioner, the Jersey regulator for data protection issues (<https://jerseyoic.org>). We would, however, appreciate the chance to deal with your concerns before you approach the OIC so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in June 2023. You should regularly check our website for the latest version of our privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website and social media accounts may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party

websites and are not responsible for their privacy statements. When you leave our website or social media pages, we encourage you to read the privacy policy of every website /page you visit.

2. The data we collect about you

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details and tax identification number (where you provide this to us for the purpose of claiming gift support).
- **Images and Voice Data** includes photographs, videos, blogs in any medium, whether live or pre-recorded.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

[We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.]

We do not routinely collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

Nor do we routinely collect any information about **Criminal Convictions and Offences**. [The exception to this is where you volunteer at one of our events or projects which expressly requires us to obtain this information e.g. where you volunteer with one of our education projects that would bring you into contact with children or vulnerable persons.]

Children [Our website and social media is not intended for children and we do not knowingly collect data relating to children. [However, where we participate in educational projects, the school, organisation or parents may disclose personal data to us. Before disclosing information in relation to a child under 13, the person making the disclosure must have the express consent of the child's parent or guardian and in providing this information they warrant that they have obtained that consent and have provided the child's parent or guardian a copy of this privacy policy.]

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to

provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you:
 - apply for a grant, become a partner or guardian or share your story;
 - make a donation;
 - volunteer, join an expedition, ask us to speak at your event or attend one of our events;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties (e.g. when you volunteer through an organisation or where you ask us to speak at events) and public sources.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies[, server logs] and other similar technologies. [We may also receive Technical Data about you if you visit other websites employing our cookies.] Please see [our cookie policy](#) for further details.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent.

Consent: Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

In the very limited circumstances in which we would collect Special Categories of Personal Data or Criminal Convictions and Offences we will ensure that we have lawful grounds to do so which may be based on compliance with legal or regulatory obligations (e.g. to make reasonable adjustments under the discrimination legislation, safeguarding of children, volunteering for certain positions within the charity). Otherwise, we would only process Special Categories of Personal Data or Criminal Convictions, with your consent. If you (or in the case of a child, a parent or guardian) voluntarily disclose this information to us, we shall treat this as express consent.

Legitimate Interest

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are

otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Our legitimate interests include but are not limited to:

- **Charity governance:** delivery of our charitable purposes, statutory and financial reporting and regulatory compliance.
- **Administration and operational management:** raising awareness and promoting OCL and our purpose, educating, answering queries, giving information, providing services, selling products, research, events management, recruitment and employment, administration of volunteers, guardians, partners and storytellers and sharing information with other charitable organisations and NGOs.
- **Fundraising and campaigning:** administering campaigns and donations, sending direct marketing, analysis, and developing communication strategies.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Compliance with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Performance of a contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as volunteer	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests
To work with you as a partner, storyteller or guardian	(a) Identity (b) Contact (c) Images and Voice Data (d) Marketing and Communications	(a) Necessary for our legitimate interests (b) Performance of a contract with you
To provide services to you (e.g. education, key note speaker, events)	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation (c) Performance of a contract with you

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register and accept donations from you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
To provide you with a grant	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation (c) Performance of a contract with you
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, a service (grant, expedition, storytelling, guardian, volunteering) or other transaction (donations).

Cookies on our website

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes for which we will use your personal data above.

- **Internal Third Parties:** directors, trustees, employees, partners, guardians, storytellers and volunteers who provide services to OCL.
- **External Third Parties:**
 - Service providers who provide photography, videography, voice recording services, drones, IT, admin and system administration services.
 - Professional advisers acting as processors or joint controllers including accountants, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. As we are a charity these services may be provided on a voluntary basis.
 - The Jersey Comptroller of Revenue, the Jersey Charity Commissioner and Register of Charities, the Jersey Financial Services Commission, or other regulators and authorities, in Jersey, or overseas (if required by law), acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
 - Other charities, government authorities or NGOs to collaborate, raise awareness, promote and further the legitimate interests of OCL.
 - With clients and media who wish to contact you directly in regards to a business or profile opportunity.
- **Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.**

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside of Jersey, the UK and/or the EEA. Please read squarespace's policy [here](#). However, if we are required to do so we ensure a similar degree of protection is afforded which may include putting in place model clauses or binding corporate rules or equivalent.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those directors, trustees, employees, volunteers, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions [and they are subject to a duty of confidentiality].

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Please contact us if you would like more information in relation to our retention periods.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within four weeks. Occasionally it could take us longer than four weeks if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.