**Summary**

Blue Ocean Capital invests in port infrastructure and logistics real estate. In the course of its business, Blue Ocean Capital holds and utilises a limited amount of personal data. “Personal Data” is data in the possession or control of Blue Ocean Capital that relates to you and either identifies you on its own or is information that can be used to identify you when used in combination with other data we hold.

This privacy notice sets out how Blue Ocean Capital uses and protects any personal data it holds, including any personal data you give when you use this website. Blue Ocean Capital is committed to ensuring that any personal data it holds is processed fairly, held securely, shall be destroyed once there ceases to be a legitimate business purpose to retain it and that privacy is protected.

Blue Ocean Capital shall process and store any personal data it holds in accordance with the EU General Data Protection Regulation (“GDPR”). This commitment is set out in more detail below.

Blue Ocean Capital may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from October 2019.

**What we hold**

We may hold the following categories of personal data:

* Individual details, such as names, postal and email addresses, telephone numbers; and
* Identification details
* Further, if you contact us through this site we may collect the following information:
* name and job title;
* contact information including email address;
* demographic information such as postcode and preferences; and
* other information relevant to our services.

**What we do with your data**

In the majority of circumstance any personal data we hold on you will be used in the course of quoting for and administering any contracts we have provided to you. Further, in limited circumstances your personal data may be used to comply with legal and regulatory requirements and protect our legal position in the event of legal proceedings.

Under the GDPR we are required to set out the basis on which it is lawful to process your personal data, which shall primarily be either:

* In the course of administering a contract which you are a party to; or
* In circumstances where you have specifically consent to such processing (for information you are entitled to revoke your consent at any time upon written notice to us).

**Your rights**

You may request details of personal information which we hold about you. In addition, you have the following under the rights under the GDPR:

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| **To Be Informed** | You are entitled to concise and transparent information about:  –        what information we hold about you;  –        why we use it;  –        who else we might share the information with and why;  –        the period for which the personal data will be stored; and  –        the right to complain to an appropriate governing body. |
| **Access** | The right to obtain from us confirmation that your personal data is being processed, and to be provided with copies of your personal data. |
| **Rectification/   Erasure** | The right to rectification is your right to require the correction of incorrect personal data.  The right of erasure (or to be forgotten) applies where:  –        the personal data is no longer needed for the purposes for which it was collected and used, e.g. you no longer have a contract with us; or  –       f if you object to or withdraw consent to use the personal data and there is no overriding legitimate reason to keep the information. |
| **Restrict processing** | The right to ask us to restrict processing activities for some of your personal data, provided certain conditions apply:  –        if you have challenged the accuracy of the personal data we hold, you can ask us to stop processing inaccurate personal data; or  –        if we no longer need the personal data for the purposes of the processing activities, we are using it for. |
| **Object** | The right to object to personal data being processed in certain circumstances, such as:  –        for marketing purposes; or  –        if we were to process your personal data for reasons unconnected with your Employment Contract or your role at Blue Ocean Capital. |

If you wish to request the details of any personal data we hold on you, or wish to rely upon any of these rights please write to us. Any of this information can be provided orally on request.

**Third Parties**

Blue Ocean Capital uses shared group resources to ensure efficiency. Because of this, information about you may be transferred to, or may be accessible by, colleagues in other parts of Blue Ocean Capital or third-party organisations. Some of our suppliers are located overseas where local privacy and data protection laws may be less stringent than in your home jurisdiction. We have in place safeguards to ensure the security of your data, including scrutiny of suppliers’ safeguards.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

**Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

**Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

**Marketing**

You may choose to restrict the collection or use of your personal data for marketing purposes in the following ways:

* whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
* if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [contact@blueocean.capital](mailto:contact@blueocean.capital)