

CLIENT AND PROSPECTIVE CLIENT DATA

We are committed to protecting and respecting everyone's privacy in addition to making sure that personal data is processed fairly and lawfully. This section explains how we use any client or prospective client information that is in our possession, as well as the measures we take to ensure that it is processed in a fair and lawful manner. This section should be read in line with our [Privacy Policy](#).

Definition of Client or Prospective Client Information

For the purposes of this statement, the 'Client' or 'Prospective Client' information that we typically process can be defined as the following:

- Any Organisation or Person(s) that we have previously been engaged with; are currently engaged with; or are foreseen to be engaged with in the future, in relation to the provision of a product or service;
- Any Organisation or Person(s) who we have determined to be a useful business contact in maintaining and enhancing our legitimate business interests.

All Personal Data is stored on our secure database and we will follow ICO guidelines in the event of a data breach.

How We Collect Client and Prospective client Information

The following list specifies ways in which we may collect Client or Prospective client data (this list is not exhaustive):

- Attending industry events and functions;
- During the course of an operational project;
- Exchanging of business cards;
- Inbound sales Inquiries;

Lawful Bases for Processing Client or Prospective client Data

We abide by all [lawful bases](#) for processing personal data. However, details on the most common bases for processing Client or Prospective client data are provided below.

Fulfilling a Contractual Obligation

We may need to process the personal data of an individual in order to:

- Fulfil our contractual obligations to them (such as the provision of a product or service);
- They have requested us to do something before we have entered into a contract with them (such as being provided with a quote)

A contract does not need to be a formal signed document, or even written down, as long as there is an agreement which meets the requirements of contract law.

Legitimate Business Interests

We may need to process the personal data of an individual if it is in our commercial interests, or if it preserves our industry reputation.

With regard to our legitimate business interests, we will ensure that all processing of data is necessary and balanced with the interests of the data subject.

Individual Rights of a Data Subject

The EU General Data Protection Regulation (GDPR) provides the following rights for individuals:

- The right to be informed

- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Individuals wishing to exercise any of these rights should contact gdpr@foundocean.com