

# DATA PROTECTION & GDPR POLICY

In compliance with the UK General Data Protection Regulation (UK GDPR) and Regulation 1.4 of the Maritime Labour Convention (MLC 2006)

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## 1. PURPOSE

This policy explains how **MAGNITUDE RECRUITMENT** collects, processes, stores, and protects personal information in accordance with UK GDPR and the Data Protection Act 2018.

It also ensures compliance with the privacy obligations outlined in MLC Regulation 1.4, which requires recruitment services to handle seafarer data securely and confidentially.

## 2. SCOPE

This policy applies to all personal data handled by **MAGNITUDE RECRUITMENT**, including information from candidates, clients, and suppliers, in both digital and paper formats.

All employees, contractors, and consultants must comply with this policy.

### **3. DATA PROTECTION PRINCIPLES**

**MAGNITUDE RECRUITMENT** upholds the following principles:

1. Data is processed lawfully, fairly, and transparently.
2. Data is collected only for explicit and legitimate purposes.
3. Data is adequate, relevant, and limited to what is necessary.
4. Data is accurate and kept up to date.
5. Data is retained only as long as necessary.
6. Data is processed securely to protect against unauthorised access or loss.

### **4. LEGAL BASIS FOR PROCESSING**

**MAGNITUDE RECRUITMENT** processes data under the following lawful bases:

- **Consent:** When candidates voluntarily submit details for recruitment purposes.
- **Legitimate Interest:** To match candidates with employment opportunities.
- **Legal Obligation:** To comply with MLC record-keeping requirements.
- **Contractual Necessity:** To perform recruitment agreements with clients.

### **5. TYPES OF DATA COLLECTED**

Examples include:

- Personal identification (Passport, Seafarer ID, Date of Birth)
- Contact details (email, phone, address)
- Professional qualifications and certificates
- Employment history and references
- Medical fitness certificates (ENG1 or equivalent)
- Log of placements and assignments

Sensitive (special category) data — such as medical or criminal records — is processed only where necessary and with explicit consent.

### **6. HOW DATA IS USED**

Personal data is used solely to:

- Identify and evaluate suitable employment opportunities.
- Verify qualifications and documentation.
- Facilitate communication between candidates and clients.

- Maintain placement records for audit and regulatory purposes.
- Comply with flag-state and MLC requirements.

**MAGNITUDE RECRUITMENT** does not use personal data for marketing without explicit consent.

## **7. STORAGE AND RETENTION**

- Data is stored on secure, password-protected systems with restricted access.
- Paper records are kept in locked storage when necessary.
- Candidate and placement records are retained for a minimum of **five years** in line with MLC Regulation 1.4.
- Data no longer required is securely deleted or anonymised.

## **8. DATA SECURITY MEASURES**

- Use of encrypted devices and secure servers.
- Regular password updates and user access controls.
- Staff training on data protection and cybersecurity.
- Anti-virus and malware protection on all systems.
- Confidential destruction of physical records.

## **9. DATA SHARING AND THIRD PARTIES**

Personal data may be shared only with:

- Verified clients for legitimate recruitment purposes.
- Flag state or regulatory authorities if required by law.
- Approved IT or data storage providers under confidentiality agreements.

**MAGNITUDE RECRUITMENT** does not sell or transfer data to any third party for marketing purposes.

## **10. RIGHTS OF DATA SUBJECTS**

Under UK GDPR, individuals have the right to:

- Access their personal data (Subject Access Request).
- Request correction or erasure of inaccurate information.

- Restrict or object to data processing.
- Withdraw consent at any time.

Requests should be sent to **enquiries@magnituderecruitment.com** and will be acknowledged within 30 days.

## **11. BREACH REPORTING**

Any data breach must be reported immediately to the Director.

Serious breaches will be reported to the **Information Commissioner's Office (ICO)** within 72 hours in accordance with UK law.

Affected individuals will be notified without undue delay.

## **12. REVIEW AND APPROVAL**

This policy will be reviewed annually or following any legislative change.

### **Approved by:**

Rebecca Adams

Director

**Date:** 16 October 2025