

# Credentials Crew: Privacy Statement

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## What is this Document?

This is the privacy statement that applies to the Credentials Crew product which is part of the Credentials platform (the **Platform**). It relates to the personal data collected by Credentials Limited, a company registered in Guernsey with company number 67547 and registered office at Victoria House, 29 – 31 High Street, St Peter Port, Guernsey GY1 2JX (**Credentials**) when you sign up to a Credentials Crew account and store your data in that account.

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## Data Controller v Data Processor

Credentials is the data controller in respect of limited aspects of your data, and a processor in respect of other aspects.

A data controller is a person who decides what data to collect, and how to use it, normally in relation to providing a product or service to you. This privacy statement deals mainly with our role as data controller. In relation to our role as data processor, the terms and conditions that apply when you create and operate your account acts as a "data processing agreement" and sets out what we can and cannot do with the data stored in your account. In relation to that data we will only act on your instructions

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## Registration

Credentials is registered with Office of the Data Protection Authority of Guernsey. The nominated data protection officer is Ellen Armsden, contactable on +44 (0)1481 524 524 or [hello@credentials.com](mailto:hello@credentials.com).

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## What is Credentials?

Credentials provides the tools to allow you to store the documents, certificates and information you choose and allows you to choose which of those to share. You can choose to share with any person, including recruiters, managers and employers (we will call these recipients "Businesses" for the purposes of this statement). We will never make these decisions on your behalf.

The protection and security of your personal information is of vital importance to us. Our business model is not in any way based on the sale of your personal data and we pride ourselves on this.

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## How this Statement applies

This privacy statement applies to the limited data that we collect in relation to the provision of your account - for example your name, contact details, IP address and usage of the Platform. Credentials has a separate statement that applies to personal data collected when a Business uses Credentials Business and a separate statement which applies to those who contact Credentials via the website (e.g. for marketing purposes or to hear about Credentials products and services). For residents of California, please see our additional statement in compliance with the California Data Protection law.

Changes to this privacy statement will be published on [credentials.com](https://credentials.com) and will be available when you next log in. Where appropriate or necessary any changes will be notified to you by email. By continuing to maintain an account or by logging on you will be deemed to have accepted the updated policy. The date of this policy is 10 October 2022.



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## Your Data

You must only upload your own personal data other than your emergency contact details. You undertake that you have permission from your emergency contact(s) to provide their details. Please make them aware of this privacy statement.

Subject to a few exceptions referred to below, we do not collect personal data on you from third party sources. Therefore all personal data that we collect is provided by you and can be summarised as follows. In our capacity as controller we do not collect any special category data such as medical details, religious or philosophical beliefs.

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## Data Controller Activities

For each piece of data we collect as controller we tell you why we collect it, and the lawful basis that we use to collect and use the data. More information about the types of lawful basis are below.

Data Collected	Purpose	Lawful basis
Registration details: Name Email address Mobile telephone number	To enable Crewdentals to establish your account	Contract
	To manage our relationship with you, including providing updates on our privacy statement and T&C	Contract
	To assist you with troubleshooting any access or account issues	Contract
	To provide marketing emails and updates To inform you of new products, services or features	Consent
Device and Usage data (device type, operating system, browser)	For security purposes To assess popular features and how people are navigating around the platform	Legitimate interests
	In order to provide a PWA (Progressive Web App) to you	Contract
	To collect feedback and provide support	Consent
Customer Support Data (contact details, feedback and survey response)	To improve our products and services	Consent

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## Lawful Basis of processing

**Contract:** We can rely on this basis where we need to process your data in order to deliver contractual service to you (ie your Crewdentals Crew account). In using this basis we only process what is necessary and in a way which is the least intrusive to your rights.

**Legitimate Interests:** We can rely on this basis where we are using your data in a way which you would reasonably expect and which have a minimal privacy impact. We have undertaken an exercise to identify our and others' legitimate interests in processing the data and balance that against your rights and freedoms. You have the right to object to our processing based on legitimate interest.

**Your Consent:** We only rely on your consent where there is no other lawful basis for our processing. Consent means offering individuals real choice and control. Where we rely on your consent to process your data, you may withdraw your consent at any point.

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## Your Data Rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You also have the right to ask us not to continue to process your personal data for marketing purposes. You can exercise any of these rights at any time by contacting us at [hello@crewcredentials.com](mailto:hello@crewcredentials.com) or mailing us at Victoria House, 29 – 31 High Street, St Peter Port, Guernsey GY1 2JX. You may also contact the Office of Data Protection in Guernsey using the contact details at this [link](#)

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## Data Sharing and Data Processing

We will only use your data for the purpose that we collected it unless we believe that any additional purpose is compatible with the original purpose. We will happily give you an explanation as to the compatibility should you wish.

Guernsey is not in the EEA but the European Commission has deemed that Guernsey provides an adequate level of protection for personal data. In order to provide the Platform to you, we may need to transfer your personal data and such transfers may be to third parties also outside of the EEA. These third parties may be processors (where we are data controller) or sub-processors (where we are processor).

Whenever we transfer your data to third parties, we will ensure that the necessary contractual provisions are in place to protect your rights by way of a processing or sub-processing agreement. In addition where we transfer your data to a third party outside of the EEA, we ensure that a similar degree of protection is afforded to it by ensuring the appropriate safeguards are implemented. Please contact us if you would like any further information about how we transfer your data out of the EEA.

There are limited circumstances in which Crewcredentials may share your personal data, such as suspected or confirmed identity fraud or other offences, valid and legally binding requests for information from third parties.

We do not sell your personal data to any person, including but not limited to managers, employers, recruiters, training centres or advertisers.

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## Connections with Businesses: explained

Whilst this section does not relate to our role as data controller, we want to explain a little more about the way Connections with Businesses work. The whole mission of Crewcredentials is to allow individual crew members to maintain one version of their personal data and share it with Businesses (with, or without a Crewcredentials Business account) that have the right to see it. Those Businesses will likely be a data controller and you should ask to see their privacy policy.

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## Connections with Businesses: explained

You can view a log of all data you have shared, and who it was shared with in the Share section of your Account. There are a couple of ways that you can share your data with Businesses:

### **(1) You choose to share your information with Businesses.**

A secure link is sent to the Business's email address that you provide. In order to access the link, the Business will need the email and the password provided in the email. The link can be revoked at any point. Once the Business has the information and data you have provided, Crewdentals is not responsible for how the Business deals with that information and data.

### **(2) Businesses using our product Crewdentals Business may send you a connection request.**

These will appear under the Connections section of your account. You will receive a system notification and email for each new Connection. Connections will have view only access to your profile section and the certificates and documents you choose to share with them. They cannot edit your profile details, instead they will have an editable copy to enable them to fulfil their contractual or legitimate interests with you. The Businesses define what data they need from you. We encourage our Business clients to seek the minimum data necessary to fulfil their obligations. If you have any queries about the data requested, you will need to speak to the relevant Business.

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## Data Security

All information you provide to us is stored on secure third party servers located in the EU. We have built multifactor authentication into the Platform to improve the security of your account. You are responsible for keeping your password confidential. We ask you not to share a password with anyone. PWAs are served via HTTPS so all data will automatically undergo end to end encryption.

As part of the PWA functionality your browser will collect and store personal data on your device using browser web storage. You may have the option within your browser settings to choose not to store such data automatically. We only store data on our device for performance and offline functionality.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

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

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## Account Closures and Inactive Accounts

If you wish to close your account, you may do so by emailing [hello@crewdentals.com](mailto:hello@crewdentals.com). Your data will be deleted within 30 days unless we are obliged to keep it for legal or regulatory purposes (such as an ongoing investigation). We may also be required to keep basic information about our customers for legal, regulatory or tax purposes.

We will monitor account activity such as frequency of log ins. Where a user has not accessed their Crewdentals account for 2 years or more we will email you to request that you actively confirm you still want your account. If you do not confirm, we will delete your account and all data and information stored.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.