



Marine
Management
Organisation

Privacy Notice

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The Marine Management Organisation (MMO) is the controller for the personal data we collect. Our [personal information charter](#) explains more about what you can expect when we process your personal data, your rights, and how to contact us or make a complaint.

MMO BLUE BELT PROGRAMME (BBP) AND BLUE BELT – OCEAN SHIELD (BBOS) - PRIVACY NOTICE

This privacy notice tells you what to expect us to do with your personal information when the MMO collects it in relation to the Blue Belt (BBP) and Blue Belt Ocean Shield (BBOS) Programmes, that assist the UK Overseas Territories (UK-OTs) with the enhancement and protection of their marine environments.

What is the Blue Belt and Blue Belt – Ocean Shield Programmes?

The UK-OTs play a vital role in global ocean conservation. Though small in land area, they hold over 90% of the UK's biodiversity and are home to some of the most unique, fragile and irreplaceable marine ecosystems on the planet.

Since 2016, the Blue Belt Programme has partnered with the UKOTs to protect and sustainably manage these critical ocean spaces – pairing UKOT leadership and stewardship with world-class scientific and technical expertise.

The programme is central to the UK Government's ambition of leading action to tackle the serious global problems of overfishing, species extinction and climate change.

The Blue Belt Programme also funds BBOS, a sub-programme to support UKOTs in improving awareness of human activities taking place within their marine environments. This enables UKOTs to ensure human activities comply

with management measures, and helps to challenge issues such as Illegal, Unreported and Unregulated Fishing (IUUF).

The programmes are funded by the Foreign Commonwealth and Development Office (FCDO) – with current funding to March 2029.

The UKOTs that are currently engaged in the BBP are Anguilla, Ascension, British Antarctic Territory (BAT), Cayman, Montserrat, Pitcairn, South Georgia & the South Sandwich Islands, St Helena, Tristan da Cunha and Turks and Caicos Islands.

Bermuda and British Indian Ocean Territory (BIOT) are currently engaged with the BBOS.

[The Blue Belt Programme - GOV.UK](https://www.gov.uk/blue-belt-programme)

Purpose for processing – why we are collecting your personal data?

MMO are providing technical support and assistance to the UKOT Governments under three impact themes:

- **Nature** – marine biodiversity is sustained, regional governance is strengthened and marine ecosystems are improved
- **Climate** – evidence-informed adaptation and mitigation, healthy and restored climate crucial habitats and enhanced environmental, economic and social resilience to climate change
- **People** – improved social well-being, secure and equitable access to sustainable seafood, UKOT influence on global marine policy and local stewardship supports conservation and sustainable management

The MMO collects and processes personal data only when necessary to help achieve the delivery of these programme impact themes.

Assistance provided to the UKOTs Governments and wider stakeholders includes:

- the facilitation of effective surveillance for activities that pose a threat to their maritime environments;
- undertaking the appropriate investigative and enforcement action in relation to suspected offences committed within their waters;
- complying with, and influencing the negotiation of new, Regional Fisheries Management Organisation (RFMO) and other international requirements and obligations;

- capacity building and training related to fisheries and maritime enforcement; and
- wider marine management activities including, but not limited to, marine protected area management, marine spatial planning, invasive and non-native species; ocean literacy and sustainable finance.

Details of individuals will be collected for a number of purposes, including but not limited to the following:

Programme administration

- surveys linked to personal data for the purposes of:
 - reporting against the Programme Monitoring Evaluation and Learning (MEL) framework and evaluating progress against identified outcomes
 - capturing insights that will help promote evidence-based decision making, adaptive management, and learning, ensuring the programme meets personal and professional needs
- gender, age range, geographic information and disability information will be collected to provide equality and inclusivity metrics for the programme
- programme administration, including communicating with stakeholders, monitoring programme impact, providing adjustments to ensure programme meets personal and professional needs, promoting evidence-based decision making, and providing equality and inclusivity metrics
- capturing insights that will help promote evidence-based decision making, adaptive management, and learning, ensuring the programme meets personal and professional needs
- contacting stakeholders about future work plans and keeping in touch on progress
- providing access to training systems
- arranging travel and accommodation for delegates travelling to training or attending events in certain circumstances
- providing reimbursement payments to delegates in certain circumstances for travel and subsistence costs incurred to attend events
- keeping in touch on progress

Compliance and Enforcement

- assisting the UKOT Governments with Maritime Domain Awareness (MDA) – including assisting with surveillance of activities within and surrounding the waters under jurisdiction of the UKOTs that pose a threat to the marine environment
- assisting the UKOTs with an investigative or enforcement action in relation to suspected offences committed within the waters of the UKOTs
- enabling effective development of Standard Operating Procedures (SOPs), guidance and training materials
- assisting the UKOTs with fulfilling their international treaty obligations – coordinating the submission of vessel and owner records as required

- complying with RFMO requirements of reporting/sharing of vessel ownership records

Integrated Marine Management

- assisting the UKOT Governments with the management of activities in their marine environment – including technical advice on legislation, spatial planning and policy
- assisting the UKOT Governments by conducting analysis of data relating to merchant and fishing vessel activity, to provide information around the scale, extent and distribution of human activities in their maritime zones, any possible breaches of relevant UKOT legislation and the threat posed to the maritime environment

What personal data is collected?

The personal data we collect may include, but is not limited to:

- Name
- Email address
- Organisation
- Telephone number
- Occupation
- Age range (for equality & diversity metrics)
- Disability (for equality & diversity metrics)
- Gender (for equality & diversity metrics)
- Income level category (for equality & diversity metrics)
- Geographic location (for equality and diversity metrics)
- Health data, where provided by you.
- Address
- Date of birth
- Next of kin / family contact details
- Country of residence/Nationality
- Photograph/Video
- Vessel ownership information where a vessel is owned by an individual – including vessel registry information, ownership details and RFMO authorisation lists and Automatic Identification System (AIS) tracking data
- Financial details from training delegates or event attendees where necessary to enable reimbursement of Travel and Subsistence costs
- Passport details, where necessary to arrange travel for delegates

Examples of activities where the MMO may collect and process personal data under BBP/BBOS include but are not restricted to:

- personal data collected from remote sensing, should the imagery lead to the identification of a vessel in individual ownership
- stakeholders' details to arrange access to stakeholder, capacity building, training events and for maintaining on-going correspondence
- personal details connected with the completion of surveys conducted for research
- publicly available vessel identification and ownership records and registries derived from surveillance
- vessel identification and ownership records to comply with an RFMO requirement
- publicly available vessel tracking data
- other data relating to merchant and fishing vessel activity, for use in analysis
- vessel tracking data obtained on request from other States
- intelligence on individuals received from a third party

How your personal data has been obtained?

MMO may obtain this personal data:

- directly from you, including via the completion of surveys conducted for research
- from pre- and post- training and event attendance surveys and questionnaires
- from remote sensing, from either the MMO's commercial provider under contract or free to use providers and portals
- from publicly available vessel identification and ownership records and registries, including those published by individual countries, RFMOs, the relevant flag State, the International Maritime Organization (IMO) and trade organisations
- from public vessel tracking data, which is accessed through systems provided by the UK's Joint Maritime Security Centre (JMSC), such as AIS
- from third parties, such as via an intelligence report or stakeholder engagement
- from MMO databases and engagement lists

Why we are able to process your personal data?

The lawful basis for processing your data as a Delivery Partner to BBP and BBOS is that it is necessary for the performance of a task carried out in the public interest, which is laid down by law or in the exercise of official authority vested in the controller. The task is a joint responsibility to deliver the aims of the programme by way of providing research and advice and assistance.

The MMO can work internationally (i.e. outside of its UK remit) by providing research and advice and assistance under sections 24 and 25 of the Marine and Coastal Access Act as amended by the Fisheries Act 2020 at the request of the Secretary of State.

The lawful basis for processing your financial data in order to make reimbursement payments is that it is necessary for the performance of a contract and as part of the public task stated above.

The Article 9 condition for processing your special category personal data (in this instance any data concerning health that may be processed in the course of collecting information relating to disability, access needs, and reasonable adjustments) is reasons of substantial public interest in relation to equality of opportunity, treatment or to enable reasonable adjustments

Consent to process your personal data

The processing of your personal data is not based on consent. However, if you wish to withdraw from the surveys, you can withdraw prior to undertaking the survey. Advice on this process is provided in the pre-amble to the survey.

Who we share your personal data with?

To ensure the effective delivery, functioning and governance of the Project, MMO may share your data with Programme Delivery partners only when deemed necessary to support the programme such as the Foreign, Commonwealth & Development Office (FCDO), Centre for Environment, Fisheries and Aquaculture Science (CEFAS), Joint Nature Conservation Committee (JNCC) and British Antarctic Survey (BAS).

MMO may share your data with the relevant UKOT Government where necessary, and where there is a Data Sharing Agreement in place between MMO and this UKOT Government. Otherwise, only aggregated or summary data sets (with personal data redacted) would be shared with these parties.

MMO respects your personal privacy when responding to access to information requests. We only share information when necessary to meet the statutory requirements of the Environmental Information Regulations 2004 and the Freedom of Information Act 2000.

How long we are keeping your personal data?

The Project is scheduled to run until 31st March 2029. We will regularly review the retention of your personal data and will keep it no longer than required and in

line with our retention policies. Information will be retained for the duration of the programme and for seven years after the programme conclusion.

Financial details obtained for the purposes of making reimbursement payments will be kept for six years after payment is made, in line with financial regulations.

Personal details including any special category data collected via pre- and post-event questionnaires will be kept for 18 months, at which point they will be anonymised once aggregation and analysis has taken place.

Please refer to our [Personal Information Charter](#) and the section 'How long we will keep data' for information on any potential exceptions.

Use of automated decision-making or profiling

The personal data you provide is not used for:

- automated decision making (making a decision by automated means without any human involvement)
- profiling (automated processing of personal data to evaluate certain things about an individual), including targeting via social media

What happens if you do not provide the personal data

If you do not provide your financial details where you are eligible for reimbursement of travel and subsistence costs, we will be unable to make these payments to you.

If you do not complete all, or specific questions, of the pre- and post- activity questionnaires, we may be unable to take your views and experiences into account.

If you do not provide your contact details for the purposes of stakeholder engagement, we will be unable to keep you updated with progress.

Transfer of your personal data outside of the United Kingdom

Where necessary, we may transfer personal information outside the UK to another country or UKOT that is deemed adequate for data protection purposes, meaning that country/UKOT has equivalent levels of protection to that of the UK.

[Adequacy | ICO](#)

Where we have a Data Sharing Agreement with the government of a country/UKOT, MMO may transfer personal information to a country/UKOT that

does not have an adequacy agreement, having first taken all precautions to ensure that it was safe to do so, complying with the terms of the UK GDPR by making sure [appropriate safeguards](#) are in place or an exception/derogation applies.

In absence of adequacy, appropriate safeguards, or Article 49 derogations, only aggregated or summary data sets (with personal data redacted) will be shared with another country/UKOT.

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure [appropriate safeguards](#) are in place.

Your rights

Based on the lawful processing above, your individual rights are:

Public Task

- The right to be informed
- The right of access
- The right to rectification
- The right to restrict processing
- The right to object
- Rights in relation to automated decision making and profiling

Contractual

- 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
- Rights in relation to automated decision making and profiling

Read our [Personal Information Charter](#) to find out about your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

How to contact us or make a complaint

Read our [Personal Information Charter](#) to find our contact details, or how to make a complaint about our use of your personal data.