



# Sarnia Marine Insurance Brokerage Co. Ltd.

17<sup>th</sup> May, 2018

Dear Clients,

## **GENERAL DATA PRIVACY NOTICE**

We are writing to inform you of important changes taking place to the data privacy laws, i.e. the **EU General Data Protection Regulation (GDPR)**, which comes into effect as from the 25<sup>th</sup> May, 2018. The GDPR gives control **to individuals** over their **personal data**, and we wish to ensure, as a valued client, you are aware of the steps we are taking to comply.

### **How data is used**

Sarnia Marine may process personal information in order to conduct contractual business and compliance activities with you as part of its insurance services: underwriting, claims, loss prevention, document processing, marketing, renewals, contract review, risk management, etc.

### **Personal data profile categories processed**

Sarnia Marine maintains personal data for:

1. Subjects of claims, investigations, proceedings etc.
2. Advisers, consultants and other professional experts
3. Business associates, other professional bodies, advisers
4. Business contacts
5. Complainants and enquirers
6. Customers and clients
7. Beneficiaries of insurance claims
8. Beneficiaries' relatives, guardians
9. Suppliers and services providers
10. Subjects of claims, investigations, proceedings and other claim related profiles

### **The legal bases we use for lawful processing**

To enable Sarnia Marine to conduct business and fulfil its legal, regulatory and contractual obligations, it needs to perform legitimate and fundamental processing. These are:

1. Establishing contracts
2. Maintaining contracts
3. Provision of all contracted services
4. Invoicing, remittance, payments, collections
5. Non-promotional communications

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6. Marketing and other promotional communications
7. Risk management contract review
8. IT support services
9. Business Continuity Planning
10. Legal and regulatory obligations
11. Responding to enquiries, requests and complaints

### **The categories of people who will access or receive the data**

Sarnia Marine may need to share the personal information it processes with individuals themselves, with insurers, and also with other organisations. Below is a description of the types of organisations with which Sarnia Marine may need to share some of the personal information it processes:

1. Agents and brokers
2. Business associates, other professional bodies, advisers
3. Central / local government
4. Claims investigators
5. Complainants, enquirers
6. Courts and tribunals
7. Debt collection and tracing agencies
8. Customers and clients
9. Data processors
10. Associates and representatives of the person whose personal data we are processing
11. Financial organisations and advisers
12. Healthcare professionals, social and welfare organisations
13. Law enforcement and prosecuting authorities
14. Ombudsman and regulatory authorities
15. Police forces
16. Professional advisers
17. Suppliers and services providers

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## **The countries where data will be stored, processed and transferred**

Your personal data collected by Sarnia Marine will be stored and processed in Cyprus. Should Sarnia Marine need to transfer your personal data, Sarnia Marine will take all reasonable measures to safeguard the transfer of your personal data to third parties in a manner that complies with the GDPR.

## **How long the data will be retained**

Retention of specific records may be necessary for one or more of the following reasons:

1. To fulfil statutory or other regulatory requirements.
2. To evidence events/agreements in case of disputes.
3. To meet our operational needs.
4. To meet any historical purposes.

Personal data that is collected and subsequently never used for any business purpose will be reviewed and may be destroyed at Sarnia Marine's discretion.

## **How we keep your information secure**

We use a range of measures to keep your information safe and secure, which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards, including obligation to protect any information and applying appropriate measures for the use and transfer of information.

## **The right to complain to the regulator**

You have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection if you think that your personal data has been inappropriately used.

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In case you would like to have further information on anything contained in this Privacy Notice, please do not hesitate to contact us.

SARNIA MARINE Insurance Brokerage Co. Ltd.