



## DATA PROTECTION & PRIVACY STATEMENT

Seascope Insurance Services Ltd (CRO No: 00980109) ("Seascope", "we", "us") is committed to protecting the privacy and data security of those with whom we interact.

We recognise the need to respect and protect information that is collected or disclosed to us (called "Personal Information" explained below).

This notice is intended to tell you how we use your Personal Information and describes how we collect and use your Personal Information during and after your relationship with us, in accordance with applicable Data Protection Laws.

Note that we do not use our website to collect or process Personal Information. We do however use cookies on our website. For more information about cookies and how we use them please [see our cookies policy](#).

### 1. WHO WE ARE

Seascope are a specialist marine insurance broker with offices in London and Athens. The majority of our business relates to commercially owned ships and their associated liabilities, however in some instances, such as the insurance of privately-owned yachts, insurances relating to personal accident or crew members we may be required to hold some additional personal data.

Seascope is committed to handling data fairly and lawfully and takes its data protection obligations seriously. Seascope ensures that it processes Personal Information in compliance with applicable data protection laws, including, without limitation, the General Data Protection Regulation 2016/679 ("GDPR").

### 2. WHAT IS PERSONAL INFORMATION AND WHAT PERSONAL INFORMATION DOES SEASCOPE COLLECT ABOUT YOU?

#### What is Personal Information?

For the purposes of this Data Protection and Privacy Statement "Personal Information" consists of any information that relates to a person and/or information from which that person can be identified, directly or indirectly.

### **What Personal Information does Seascope collect?**

We may collect, use, store and transfer different kinds of Personal Information. The Personal Information we collect may include as follows:

Name

Contact details

Date of birth

Job role, position and company information

Where we effect insurances relating to personal accident /medical benefits we may be required to hold some Special Category Personal Data (as defined in the GDPR) such as healthcare information (for example, medical conditions).

### **Provision of data**

Insured persons are obliged to provide Personal Information to us. This is so we can verify data and so that our personal customers can purchase their chosen products from us. Failure to provide this information may mean that we cannot perform this contract and you would not have access to our products.

## **3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

Seascope only collects information provided by you for the purpose of placing and administering contracts of insurance or reinsurance.

## **4. HOW DO WE USE YOUR INFORMATION?**

We may use the Personal Information we collect for the following purposes:

To perform necessary due diligence (“know your client”) regarding money laundering regulations and sanctions checks.

To provide information to an interested insurer to assess the rating for a particular risk.

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary for the performance of an insurance contract with you.

Where we collect Special Category Personal Data, we will not use this except for the purposes of establishing the appropriate rating, terms and conditions of insurance cover with insurers, or for the payment of a claim in respect of illness, injury or death.

### **Communications**

Seascope may use your Personal Information to send you communications by mail, telephone or email. For situations where you are purchasing insurance services via our intermediary, this is for the performance of the contract with you. For further information on

this, see the 'Your Choices' section of this Data Protection and Privacy Statement.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with Seascope.

## **5. TO WHOM DO WE DISCLOSE YOUR INFORMATION?**

We will only use your Personal Information for our business purposes, for example, as set out above.

We do share your information with insurers. We do this only for the performance of contracts where a private individual, or property owned by a private individual is insured.

We may share your information with third parties such as accountants, legal teams, regulators and other professional bodies. We would do this so that we can comply with any legal obligations.

We may also disclose Personal Information to establish, exercise or defend our legal rights including providing information to others and/or in connection with any ongoing or prospective legal proceedings. We may also disclose Personal Information to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personal Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Information.

We never sell any of your Personal Information to third parties.

## **6. WHAT DO WE DO TO KEEP YOUR INFORMATION SECURE?**

We have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our services. In addition, we limit access to your Personal Information to those employees, agents and other third parties who have a business need to know. They will only process your Personal Information on our instructions, and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

## **7. THE COUNTRIES WHERE DATA WILL BE STORED, PROCESSED AND TRANSFERRED**

Your personal data collected by Seascope may be stored and processed in the United Kingdom or any other country in which Seascope or associated third parties maintain facilities.

Should we need to transfer your personal data outside of the United Kingdom, we will take all reasonable measures to safeguard the transfer of your personal data to third parties in a manner that complies with the GDPR. By providing us with your Personal Information, you

acknowledge that we will collect, transfer, store and process your information. We will take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Data Protection and Privacy Statement.

## **8. DATA RETENTION – HOW LONG WE WILL STORE/KEEP YOUR PERSONAL INFORMATION**

We will only retain your Personal Information for as long as necessary for the purposes for which it was collected and in accordance with applicable laws.

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

- To fulfil statutory or other regulatory requirements or in order to protect your vital interests or the vital interests of another natural person.
- To evidence events/agreements in case of disputes.
- To meet our operational needs.
- To meet any historical purposes.

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

## **9. ACCESSING YOUR PERSONAL INFORMATION AND OTHER RIGHTS YOU HAVE**

You have rights regarding the personal data we store on your behalf. These are:

- access to a copy of your personal data;
- restrict the processing of your personal data;
- object to processing personal data;
- the right to data portability (you can ask that we transfer your personal data to another organisation or to you);
- the right to withdraw consent (to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent);
- stop receiving direct marketing material;
- object to decisions being taken by automated means;
- have inaccurate personal data rectified, blocked, erased or destroyed;
- lodge a complaint with the Information Commissioner's Office;
- claim compensation for damages caused by a breach of the GDPR.

These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Should you ever wish to exercise any of these rights, please contact us on our details in clause 14 below.

## **10. ENFORCING YOUR RIGHTS**

If you wish to enforce any of your rights under applicable Data Protection Laws, then we will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by applicable Data Protection Laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable Data Protection Laws.

### **Complaints**

If you think that your personal data has been inappropriately used, you have the right to lodge a complaint with the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)) which is the data protection regulator in the UK which is where Seascope is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

## **11. YOUR CHOICES (E.G. MARKETING RELATED EMAILS OR OTHERWISE)**

Seascope may use your Personal Information (such as your contact details (e.g. name, address, email address, telephone number)) to send you marketing-related correspondence related to our services, in accordance with your email and contact preferences. When we process your Personal Information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so, or in the case of our email notification service, that it is necessary to perform our contract with you.

We do not share Personal Information with third parties for the third parties' marketing purposes (but we may share it with any third-party service providers who may assist us with sending such marketing related correspondence).

## **12. DATA PROTECTION OFFICER**

Seascope is a small company whose core activities do not involve large scale processing of personal data and we have therefore decided that we do not meet the criteria necessary for the appointment of a Data Protection Officer

### **13. CHANGES TO THIS DATA PROTECTION AND PRIVACY STATEMENT**

It is important that you check back often for updates to the Data Protection and Privacy Statement, as we may change this Data Protection and Privacy Statement from time to time. The "Date last updated" legend at the bottom of this page states when the Data Protection and Privacy Statement was last updated, and any changes will become effective upon our posting of the revised Data Protection and Privacy Statement.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting a notice of the changes on our website.

### **14. CONTACT US / FURTHER INFORMATION**

If you have any queries at all in relation to your data and how we protect your data rights, please contact us:

Contact: Mr. Tony Flanagan

Position: Director

Address: Seascopes Insurance Services Ltd, 57 Mansell Street,  
London E1 8AN

Email: [enquiries@seains.com](mailto:enquiries@seains.com)

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