

Winter & Co (Marine) Ltd Privacy Policy

Winter & Co Marine Ltd takes your privacy seriously and understands that you care about how your personal data is used and shared. We will only collect and use your personal information in accordance with the terms of this notice and in a manner that is consistent with our obligations and your rights under the law.

The General Data Protection Regulation (GDPR) is the new legislation that governs how we use and protect your personal information. GDPR comes into effect on 25th May 2018.

This Privacy Policy explains the types of personal information we collect and how we use, disclose and protect that information.

What does this privacy policy apply to?

This Privacy Policy applies to personal information collected by Winter & Co Marine Ltd in connection with the services and products we offer. This includes information collected directly from you (face to face), by telephone, post, email, when you voluntarily complete any online contact forms through our website. It also includes any information we collect as a result of you completing proposal forms, claim forms, direct debit forms or credit agreements.

Your Rights

You have the following rights under the General Data Protection Regulation (GDPR) which this Privacy Policy is designed to facilitate:

- to be informed about our collection and use of your personal data;
- to ask for a copy of the personal data that we hold about you;
- to ask us to update any personal data we hold about you that is inaccurate or incomplete;
- to ask us to delete any personal data we hold about you
- where processing is based on your explicit consent, to withdraw your consent so that we stop that particular processing of your personal data;
- to obtain a copy of your personal data and to transfer it to another organisation;
- to object to us using your personal data for particular purposes; and
- to restrict how we use your personal data whilst a complaint is being investigated.

If you have any questions, comments or concerns about our use of your personal data, or you wish to exercise any of the rights listed above, please contact us.

What Data Do We Collect?

Your “personal information” means information that could allow you to be identified. In order for us to provide insurance quotes, insurance policies, and/or deal with any claims and for crime prevention, **we** need to collect and process personal data about **you**. The types of personal data that are processed may include:



Types of Personal Data	Details
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
Financial information	Bank account or payment card details, income or other financial information
Risk details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data. For certain types of policy, this could also include telematics data.
Policy information	Information about the quotes you receive and policies you take out
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
Previous and current claims	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports
Special categories of personal data	Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

Where might we collect your personal data from?

We might collect your personal data from various sources depending on your particular circumstances:

- you;
- your family members, employer or representative;
- other insurance market participants;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- Government agencies such as DVLA and HRMC;
- open electoral register;
- in the event of a claim, third parties including the other party in the claim, witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers.

How Do We Use Your Data?

Our use of your personal information will always have a lawful basis, either because it is necessary to provide the services you have requested from us, because you have consented to our use of your personal data or because it is in our legitimate interests. The purposes we and other insurance market participants might use your personal data for are:





Quotation/Inception:	<ul style="list-style-type: none"> • Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks • Evaluating the risks to be covered and matching to appropriate policy/ premium • Payment of premium where the insured/policyholder is an individual
Policy administration:	<ul style="list-style-type: none"> • Client care, including communicating with you and sending you updates • Payments to and from individuals
Claims Processing:	<ul style="list-style-type: none"> • Managing insurance and reinsurance claims • Defending or prosecuting legal claims • Investigation or prosecuting fraud
Renewals:	<ul style="list-style-type: none"> • Contacting the insured/policyholder to renew the insurance policy • Evaluating the risks to be covered and matching to appropriate policy/ premium • Payment of premium where the insured/policyholder is an individual
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:	<ul style="list-style-type: none"> • Complying with our legal or regulatory obligations • General risk modelling • Transferring books of business, company sales & reorganisations
Marketing	<ul style="list-style-type: none"> • Sending you information about other Winter & Co Marine Ltd products and services we think may be of interest to you. • Sending you risk management information that we think will help you to identify and mitigate the risks in your business.

The use of your personal data for marketing purposes

When you become a customer we will on occasion use your name and email address to send you information about other Winter & Co Marine Ltd products and services that we think may be of interest to you. We will also send you risk management information that we think will help you manage and mitigate the risks in your business and minimise their financial impact. Your information will only be used by Winter & Co Marine Ltd and we will not be shared with third parties. Winter & Co Marine Ltd believe that it is reasonable to assume that its customers would expect us to promote our services and products to them, provided such customers have not indicated that they do not want to receive such material.

You have the right to object to our use of your personal details for marketing purposes whereupon we will cease such activity immediately. If you wish Winter & Co Marine Ltd to stop sending you marketing material you can contact us by telephone, email or post. We will give you the opportunity to decline receiving marketing material when we first collect your contact details and provide the option to unsubscribe in all subsequent marketing communications

Consent to use of special categories of personal data

In some circumstances, we (and other insurance market participants) may need to collect and use special categories of personal data (e.g. health information) or information relating to criminal convictions and offences. Where this is required your consent to this processing may be necessary for us to provide you with the relevant services and you hereby consent to such processing.





Although you may withdraw this consent at any time, if you do we may be unable to continue to provide services to you and this may mean that we are unable to process your enquiry or claim or that your insurance cover will stop.

How long do we keep your personal data?

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

Transferring your personal information

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). This would only happen if we are following your specific instructions; complying with a legal duty or working with insurers, agents or advisers who we use to help provide our products and services. Those transfers would always be made in compliance with the GDPR.

Who might we share your personal information with?

So that we can provide you with insurance quotes, arrange insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you and to share this information with third parties such as other insurance intermediaries, insurers, reinsurers and loss adjusters. We may also need to disclose personal data for these purposes to our service providers, contractors and agents that perform activities on our behalf.

Where we share your personal data with Insurance Market participants such as insurers, re-insurers and intermediaries, the Lloyds and London Insurance Market Core Uses Information Notice sets out the core necessary personal data uses and disclosures required. This Privacy Policy is consistent with the Lloyds and London Market Core Uses Information Notice. We recommend you review this notice.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

Contacting us

Please contact us if you:

- have any questions about this Policy or the information we hold on you;
- would like a copy of the personal information that we hold about you
- wish to correct something in the personal information we hold about you
- wish to change your consent on our use of your personal information for marketing purposes
- wish to withdraw consent for use of special categories of personal information





Email: info@winterandcomarine.com
Telephone: 01255 831111
Write to us at: Winter & Co Marine Ltd, Maud's Court, Tendring, Essex CO16 0BG

Your right to complain to the ICO

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights under the GDPR, or if you think that we have breached the GDPR, then you have the right to complain to the **ICO**. The contact details of the ICO are set out below:

Information Commissioners Office
Wycliffe House, Water Lane
Wilmslow, Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or
01625 545 745

Email: casework@ico.org.uk

Changes to Our Privacy Policy

We keep this Privacy Policy under regular review and may revise from time to time. We will give you reasonable notice of any material change.

This Privacy Policy was issued on 30th April 2018

