

MORGAN MARINE INSURANCE SERVICES

Privacy Notice

What is the purpose of this document?

Morgan Marine Insurance Services is committed to protecting the privacy and security of **your Personal Data**.

This notice describes how we, as an intermediary, collect and use personal data about you during and after your engagement with us, in accordance Data Protection Laws. In particular this notice is designed to help you understand how we process your personal data through the insurance cycle.

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including **your personal data**, involves being shared between different insurance market participants. For example; intermediaries, insurers and reinsurers. The insurance market is committed to safeguarding that information.

It is important that **you** read this notice, together with any other privacy notice **we** may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

If you fail to provide personal data:-

Where **we** need to collect **personal data** by law, or under the terms of a contract **we** have with **you** and you fail to provide that data when requested, **we** may not be able to perform the contract we have or are trying to enter into with you (for example, to provide **you** with insurance broking services) In this case, we may have to cancel a service **you** have with **us** but **we** will notify you if this is the case at the time.

Morgan Marine Insurance Services is a “data protection controller”. This means that we are responsible for deciding how we hold and use personal data about you.

Our Data Protection Controller is Lisa Noble, Director of Morgan Marine Insurance Services who can be contacted on 01277 224440 or info@morganmarineinsurance.co.uk.

All members of our workforce must comply with this policy when processing personal data on your behalf. Any breach of this policy may result in disciplinary or other action.

Changes to this privacy notice and your duty to inform us of changes

This notice may be updated from time to time. You should check our website periodically to view the most up to date Privacy Notice.

It is important that the **personal data** **we** hold about you is accurate and current. Please keep us informed if **your personal data** changes during your relationship with us.

Defined Terms

In this notice:

We, us or **our**, refers to Commercial Marine Insurance Services Limited, Trading As-Morgan Marine Insurance Services. Our company registration number is 4060582. We are an independent insurance

intermediary authorised and regulated in the United Kingdom by the Financial Conduct Authority (FCA) under Firm Reference Number 304184;

You or your, refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants** (you may be the **insured, beneficiary, claimant** or other person involved in a claim or relevant to a policy).

This document sets out what personal data we will hold about you, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

Types of Personal Data:	Details
Individual details	Name, address (in some cases proof of address), other contact details (e.g. email and telephone numbers, date and place of birth, nationality).
Risk details	Information about you which we need to collect to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions. Professional qualifications and depending on the risk we will request details of your experience.
Policy information	Information about the quotes you receive and policies you take out.
Credit and anti-fraud data	Credit history, 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, which may include data relating to your health and/or criminal convictions.

<p>Settlement for Policy Premiums</p>	<p>Following your instructions to proceed with the insurance contract, settlement of premiums can be paid by a Debit card. We do not store card details, immediately after use they are securely disposed of. Alternative acceptable methods of settlement are by cheque or bank transfer direct into our designated client accounts.</p>
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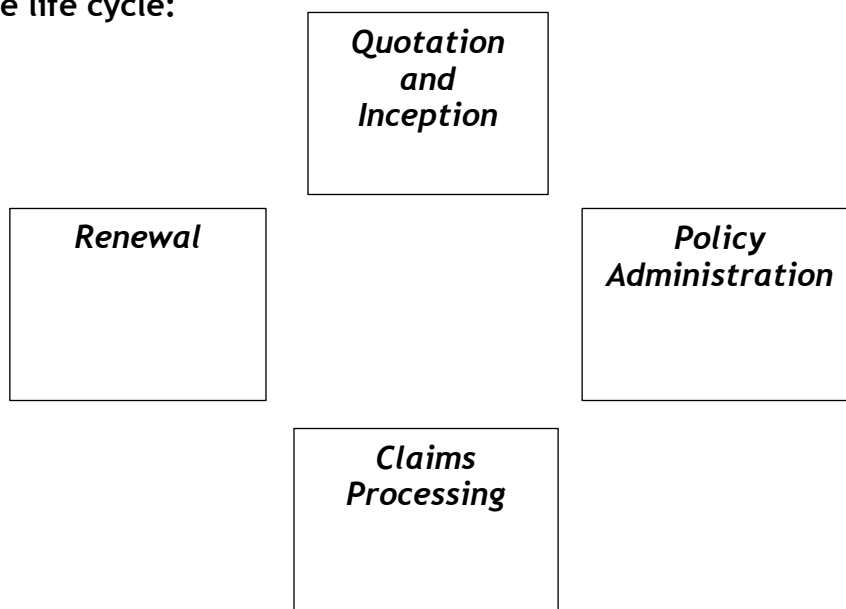
Where do we get your personal data from?

We might collect your personal data from various sources, including:

- You** (for example by filling in forms or by corresponding with us by post, phone, email, our website quotation forms or otherwise);
- Your** family members, employer or representative;
- Other insurance market participants;**
- Anti-fraud databases, sanction list and other databases.
- In the event of a claim, third parties including the other party to the claim (claimant/defendant) witnesses, experts, loss adjustors, solicitors and claims handlers.
- We** might collect **your** personal data if a third party (such as a family member or your employer) has taken out an **insurance policy** through us for **your** benefit (**you are an insured or beneficiary**) in which case we might collect **your personal data from your** family member, employer etc;

How the Insurance Market Works

Insurance life cycle:



Consent

In order to arrange and provide insurance cover and to pass **your** details to the insurers' relevant claims handler in certain circumstances we and other **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal conviction records, as set against the relevant purpose.

Your consent to this processing may be necessary for us and other insurance market participants to achieve this.

You may withdraw your consent to such processing at any time. However, if **you** withdraw **your** consent this will impact our and other insurance market participants', ability to place, administer and provide insurance or pay claims.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

RETENTION OF 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 **insurers'** wish to bring a legal claim under or in relation to **your insurance**, or where **we** are required to keep **your personal data** due to legal or regulatory reasons.

In some circumstances **we** may 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**.

The retaining of data is necessary where required for contractual, legal or regulatory purposes of for our legitimate business. **We** will retain all records of your personal data and any special category and criminal conviction data in respect of any insurance contract agreement **between us** for a period of 7 years after the end of the contractual agreement or for such longer period as underwriters may require in accordance with any applicable law or regulation.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. You should be aware that by clicking on any link you have left our website and we do not have any control over any other website.

INTERNATIONAL TRANSFERS

Although unlikely, **We** may need to transfer **your** data to **insurance market participants** or their affiliates or sub-contractors which are located outside the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact our **Data Protection Controller**.

YOUR RIGHTS AND CONTACT DETAILS OF THE INFORMATION COMMISSIONER'S OFFICE (ICO)

If **you** have any questions about this privacy notice or in relation to our use of **your personal data**, **you** should first contact **our Data Protection Controller**. Under certain conditions, **you** may have the right to require us to:

- Provide **you** with further details on the use we make of your personal data;
- Provide **you** with a copy of the **personal data** that **you** provided to us;
- Update any inaccuracies in the **personal data** we hold;
- Delete any **special category of personal data** that **we** no longer have a lawful ground to use;
- Where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- Object to any processing based on the legitimate interests grounds unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights; and
- Restrict how **we** use **your personal data** whilst a complaint is being investigated.

In certain circumstances **we** may need to restrict the above rights in order to safeguard the public interest (e.g the prevention or detection of crime) and our interests (e.g the maintenance of legal privilege).

If **you** wish to exercise any of the rights set out above, please contact **our** Data Protection Controller.

No fee required

You will not have to pay a fee to access **your personal data** (or to exercise any of the other rights). **Your personal data** we hold can be supplied in various formats. In some cases it would be impossible to supply **you** with the entire paper file if **you** have been **with us** for many years. The details held would only be relevant to the insurance cover **we** have arranged.

What we may need from you

We may need to request specific information from **you** to help **us** confirm **your** identity and ensure **your** right to access **your personal data**. This is a security measure to ensure that **personal data** is not disclosed to any person who has no right to receive it. We may also contact **you** to ask **you** for further information in relation to **your** request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take **us** longer than one month if **your** request is particularly complex or **you** have made a number of requests. In this case **we** will notify **you** and keep **you** updated.

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 in Section “Your Rights and Contact Details of the ICO” or if you think that we have breached the GDPR, then you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Please see below for contact details of the ICO.

Information Commissioner’s Office: 0303 123 1113 or 01625 545 745

GLOSSARY OF KEY INSURANCE TERMS

BENEFICIARY is an individual or a company that an **insurance policy** states may receive a payment under the **insurance policy** if an insured event occurs. A beneficiary does not have to be the **insured/policy holder** and there may be more than one beneficiary under an **insurance policy**.

CLAIMANT is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**.

CLAIMS PROCESSING is the process of handling a claim that is made under an insurance policy.

QUOTATION is the process of providing a quote to a potential **insured/policyholder for an insurance policy**.

INCEPTION is when the insurance policy starts.

INSURANCE is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of **insurance**. The expression insurance may also mean **reinsurance**.

INSURANCE POLICY is a contract of insurance between the insurer and the insured/policyholder.

INSURANCE MARKET PARTICIPANT(S) OR participants: is an **intermediary, insurer or reinsurer**.

INSURED/POLICY HOLDER is the individual or company in whose name the **insurance policy** is issued. A potential **insured/policyholder** may approach an intermediary to purchase an insurance policy or they may approach an **insurer** directly or via a price comparison website.

INSURERS: (sometimes also called underwriters) provide insurance cover to **insured/policy holder** in return for a **premium**. An insurer may also be a **reinsurer**.

INTERMEDIARIES help **policyholders and insurers** arrange insurance cover. Many insurance and reinsurance policies are obtained through **intermediaries**.

POLICY ADMINISTRATION is a process of administering and managing an **insurance policy** following its **inception**.

PREMIUM is the amount of money to be paid by the **insured/policyholder** to the **insurer for the insurance policy**.

REINSURERS provide insurance cover to another **insurer or reinsurer**. That insurance is known as **reinsurance**.

RENEWAL is the process of the **insurer** under an **insurance policy providing a quotation to the insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry.

KEY DATA PROTECTION TERMS

Data Protection Laws means all laws and regulation relating to the Processing of Personal Data, including the GDPR, as the same may be in force from time to time.

GDPR is the EU General Data Protection Regulations and the new UK Data Protection Act, which replaces the UK Data Protection Act 1998 from the 25 May 2018.

DATA CONTROLLER is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used.

INFORMATION COMMISSIONER'S OFFICE (ICO) is the regulator for data protection matters in the UK.

PERSONAL DATA is any data from **you** which can be identified and which relates to **you**. It may include data about any claim **you** make.

PROCESSING OF PERSONAL DATA includes collecting, using, storing, disclosing or erasing **your personal data**.