

Our Privacy Notice

This notice covers our requirement to provide you with information on how and why we use your personal data and your rights under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

Personal Information

This privacy notice tells you what to expect when we collect personal information about you.

Personal Information denotes:

- Information you provide us with by filling in contact details on our website
- Information you provide us with by completing a proposal form
- Information that you provide us with over the telephone, via email or face to face

By providing us with information about yourself, you are considered to be a Data Subject.

The Data Protection Principals

As we are responsible for gathering and using your personal information, we have to follow strict rules called the data protection principles. As such, we must make sure that your information is:

- ✓ Used fairly and lawfully in a transparent manner
- ✓ Used for explicit and legitimate grounds only
- ✓ Used in a way that is adequate, relevant and not excessive
- ✓ Accurate and kept up to date
- ✓ Kept for no longer than is absolutely necessary
- ✓ Handled according to your rights
- ✓ Kept safe and secure
- ✓ Not transferred outside the [European Economic Area](#) without adequate protection

Who Is Responsible For Your Personal Information

Orwell Transport and Marine Underwriters. (the Data Controller)determines the purposes for which and the manner in which any personal data is, or is to be, processed.

Data Controllers must ensure that any processing of personal data for which they are responsible complies with the Act.

Why We Gather Personal Information About You

We provide a range of insurance products. We process data provided by you (the Data Subject) and other sources in order to deliver the appropriate products and services to you.

The reasons for processing your data is mainly to:

- ✓ Provide you with a quotation for insurance

- √ Arrange and administer your policy if you buy one through us
- √ Inform you about our products and services

We do not collect more information than we need to meet our obligations to you and will not retain it for longer than is necessary.

Some of the personal information we ask you to provide us with may be sensitive (special category data). We are allowed by legislation to collect such information for insurance purposes without specific consent but it will only be used for the purposes we have set out above.

We will only ever use your personal information for the purpose of progressing your application for insurance, administering your insurance policy, or fulfilling our legal or regulatory requirements such as fraud prevention, help preventing financial crime and audit purposes.

If you provide us with information about another person, in doing so, you confirm that they have given you permission to provide it to us and that we may use their personal data in the same way as your own as set out in this Privacy Notice.

Legal Basis For Processing Your Personal Information

We are required to have a lawful basis in order to process your personal data and the relevant bases which apply:

Purpose of Processing	Lawful Basis
Providing quotations, arranging and administering insurance policies	Necessary for the performance of an insurance contract
Provision of information on products and services	Our legitimate interests or your explicit consent
To notify you of changes to our service	Our legal and regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our legal and regulatory obligations
To meet general legal or regulatory obligations	Our legal and regulatory obligations

Who Do We Share Your Details With and Why

To meet our regulatory obligations and our obligations to you, we may therefore need to share your personal information with product and service providers such as insurers and underwriters, insurance industry databases, premium finance companies, regulatory authorities, the Police and other law enforcement bodies.

International Transfers of Data

We may transfer your personal data to destinations outside the European Economic Area (EEA). Where we do, we will ensure it is treated securely and in accordance with Legislation.

Data Retention

The type of insurance we arrange for you dictates the amount of time we retain your personal information for. For the majority of insurance products, we retain records for a period of 7 years after your insurance contract with us expires. For liability related insurance products, we retain records for a period of 12 years after your insurance contract with us expires.

Marketing

We may contact you by email, text, telephone, mail or by other agreed means to keep you up to date about our products or services.

You are able to opt out of receiving such communications at any time by contacting us at jd@otmu.co.uk

Security

We are committed to protecting the security and privacy of all personal information which we obtain and hold about you.

We employ appropriate technical security measures to protect your personal information and ensure that it is not accessed by unauthorised persons. Information is stored on secure computers, in a locked information centre, and information is encrypted wherever possible.

We use a third-party service provider to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to our website.

Cookies In General

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

The cookie is sent back and forth between a web browser and the server it accesses. The information a cookie contains and its purpose is determined by the website operator and can be used by the web server every time you visit that site.

Cookies are used to save time and make visiting web sites more efficient, to record site usage and remember information input on forms and pass information from page to page during a single user's website session.

They can be used for many different reasons - from remembering login information and what is in your online shopping basket and in respect of online adverts so you see more adverts suited to what you want.

Cookies

We use cookies for statistical and functionality purposes only, we track how many individual unique users we receive and the frequency they visit our website.

The information tells us which of our pages are most frequently visited and by which types of users and from which countries. This allows us to see which content is more popular than others. We use [Google Analytics](#) to do this.

The information that we collect from cookies is anonymous and does not identify people or collect personal data about website visits.

We don't sell the information collected by cookies, nor do we disclose the information to third parties, except to our associated companies and where required by law (for example to government bodies and law enforcement agencies).

How Can You Manage Your Cookies?

You can manage how your computer/internet device manages cookies through your browser settings.

Most browsers can be altered to prevent your computer from accepting cookies. This may result in some of the features of this site and other sites not working properly and may restrict your user experience.

If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether.

You can modify your browser settings through the menu, generally found under 'options' or 'preferences'.

The following links may be helpful, otherwise you should use the 'Help' option in your browser for more details.

How To Manage Your Cookie Settings In:

[Internet Explorer](#)

[Firefox](#)

[Chrome](#)

[Safari](#)

There is lots of guidance available explaining what cookies are and what they can do.

More Information about Cookies

More information to help you find out more about cookies can be found on the following links: -

<http://www.allaboutcookies.org>

<http://www.youronlinechoices.eu>

<http://www.international-chamber.co.uk/our-expertise/digitaleconomy>

Conditions of Use

By continuing to use the site you agree to the use of cookies. Acceptance of these cookies is a condition of using our website and if these cookies are restricted or refused in any way we can offer no guarantee that the site will function properly for you.

Where Your Information Is Stored

Information which you provide us with is stored on a computer located in the UK. This is necessary in order to process the information and to send you any information you have requested. If you use our Services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those Services.

If You Send Us An Email

Any email you send to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

If You Make A Complaint to Us

If we receive a complaint, we make up a file containing the details of the complaint. The file is likely to contain the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to investigate and process the complaint.

We usually have to disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We also usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may also be required to provide a copy of the file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint.

We are required to disclose high-level analytics to the Financial Conduct Authority (FCA) concerning the number and nature of any complaints we receive. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 3 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Use of Data Processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Your Rights

You have rights as an individual which you can exercise in relation to the information we hold about you.

Please ask us for an explanation of each should you wish to have more information:

- ✓ The right to be informed
- ✓ The right of access
- ✓ The right to rectification
- ✓ The right to erasure (unless we are required to hold your data to meet our regulatory or legal obligations)
- ✓ The right to restrict processing
- ✓ The right to portability
- ✓ The right to object
- ✓ Rights to automated decision and profiling

Your Right To Access

You have the right to access any information we hold about you, and the right to know why that data is being processed, how long it's stored for, and who has had or has access to it.

You will not be charged for us supplying you with this information however we do reserve the right to apply a reasonable fee where requests are deemed excessive.

We will respond to any such request within the maximum time frame allowed of one month.

How To Contact Us

For further information on how your information is used, how we maintain the security of your information and your rights to access the information we hold on you or if you would like to make a complaint, you can write to us, email us, or call us as follows:

Compliance Officer

Johnathan Happs
6th Floor
Dukes House
32 – 38 Dukes Place
EC3A 7LP

Compliance Officer

C/ Castello 59
Bajo, 28001
Madrid

If You Have A Complaint

If you have any concerns about your rights and our practices in relation to data protection, please contact us directly using the details provided above. We will aim to respond to your concerns and clarify how we have processed your information and with whom. We will also endeavour to put right anything that's gone wrong.

If you are still dissatisfied after contacting us, you may report your concern to the UK Information Commissioner's Office by contacting them as follows:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Website: www.ico.org.uk