



Blue Seas Adjusters

PRIVACY NOTICE

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe. Blue Seas Adjusters Ltd are committed to safeguarding any personal data that you provide to us. Whenever you provide (or someone acting on your behalf provides) us with your personal data, we are legally obliged to use it in line with all laws concerning the protection of such information.

GENERAL DATA PROTECTION REGULATIONS (GDPR) DEFINITION – ‘PERSONAL DATA’

Under the GDPR ‘personal data’ (referred to as personal information in this notice) means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

COLLECTION, RETENTION AND DISCLOSURE OF PERSONAL INFORMATION

We collect personal information from you, so we can provide Average Adjusting services to you. The types and categories of information we collect and maintain about you include:

- Information we receive from you to provide advice or services (such as address, telephone number and financial information);
- Information we receive from professional advisers authorised to act on your behalf (such as your brokers, Underwriters or managers), if applicable; and
- Information that we may receive from third parties with respect to your account (such as technical and/or legal opinion).

The retention period is determined by factors such as statutory requirements or industry guidelines. Your personal information in relation to the provision of advice or Average Adjusting services may be stored for a period of up to 6 (six) years following the termination of the services. It may be necessary to retain your information beyond this point depending on additional legal/regulatory obligations.

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COLLECTION, RETENTION AND DISCLOSURE OF PERSONAL INFORMATION

We disclose your personal information to third parties in certain instances and only in connection with providing advice or Average Adjusting services to you. Some of the instances are listed below:

- Disclosures to companies that perform services on our behalf (such as our technology consultants who maintain our computer systems and our external auditors) subject to agreements that prohibit such companies from disclosing or using the information other than for the services required or as permitted by law;
- Disclosures at your direction to your professional advisers (such as your accountant, attorney/solicitor and appointed consultant, if applicable); and
- Disclosures required by law, for example, for anti-money laundering purposes.

The disclosure of personal information to third parties may involve the transfer of data to jurisdictions outside the European Economic Area (EEA). Such countries may not have the same data protection laws. Any transmissions of personal information by Blue Seas Adjusters Ltd or its delegates outside the EEA shall be in accordance with the conditions in the GDPR.

Where we require your personal information to comply with regulatory or legal requirements, failure to provide this information means that we may not be able to accept you as a client.

SECURITY OF CLIENT INFORMATION

We have policies and procedures in place that are designed to safeguard the confidentiality of your personal information. These include:

- Physical, electronic and other procedural safeguards designed to keep your personal information confidential and secure;
- Limitation of access to personal information to those employees who need it to perform their job duties and are trained in the proper handling of such personal information;
- Protecting information of our former clients to the same extent as our current clients; and
- Requiring third parties that perform services for us to keep information confidential and secure.

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YOUR RIGHTS

We respect your right to access and control your information. We will respond to requests for information and, where applicable, will correct, amend or delete your personal information unless legal or regulatory restrictions (for example for anti-money laundering purposes) prevent us.

Under GDPR your rights include:

- The right to be informed;
- The right of access;
- The right to rectification;
- The right of erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object and
- Rights related to automated decision making.

You have the right to lodge a complaint with the Office of the Information Commissioner's Office (the supervisory authority for data protection in the UK) if you consider that the processing of personal information relating to you carried out by us or our service providers infringes the GDPR.

If you have any questions concerning this Privacy Notice, please contact the Data Protection Manager: telephone +44 20 7481 3335; email: dpm@blueseasadjusters.com