PRIVACY POLICY

Altitude Insurance Ltd and/or Altitude Insurance Brokers Ltd and/or Altitude Quest Insurance and/or Altitude Quest Insurance Solutions (known collectively as "Altitude" or the "Company")

This Privacy Notice will inform you of the information we gather and how it is used. The Company maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. The Company complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data. Our Data Privacy Policy is available on request.

We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of the Company in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Altitude Insurance Ltd and/or Altitude Insurance Brokers Ltd and/or Altitude Quest Insurance and/or Altitude Quest Insurance Solutions
- Contact details of Laura Durcan (below)
- When we refer to 'we' it is Altitude Insurance Ltd and/or Altitude Insurance Brokers Ltd and/or Altitude Quest Insurance and/or Altitude Quest Insurance Solutions

Please read this Statement carefully as this sets out the basis on which any personal data, we collect from you, or that you provide to us, will be processed by us.

Who Are We?
The Company is committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details. We will always clearly identify ourselves in all correspondence and on our website. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to a range of general insurance products – full list available upon request.

To provide you with relevant information, respond to your requests and arrange general insurance products upon your request, we ask that you provide us with information about yourself.

Our Data Protection Officer/ GDPR Owner and data protection representative can be contacted directly here:

- Name – Laura Durcan
- Email address – laura@altitudeinsuranceltd.com
- Phone number – 00353 (0)89 223 1051/ 0044 (0)7780 552494

What Information We Gather & Why? Our Legal Basis -
In order for us to provide you with advice and arrange transactions on your behalf in relation to general insurance products, we need to collect personal data from you so that Insurers can adequately assess the risk presented to them.

We collate your data and present it in a format agreed with Insurers in order for them to receive what they need, for example, this may be via a secure internet-based system or word/ PDF document sent via email. Upon receipt of your data, Insurers then assess what has been provided and, decide if they are able to look to enter into a contract of insurance with you. We only use your data for the placement and servicing of your insurance contracts.

In order to provide you with our general insurance intermediary services it is necessary for us to collect and process your personal data. We are required, therefore, to inform you of the legal bases for processing your personal data. One such legal basis is that the processing is necessary for the performance of the advisory services contract (and any other contract) that we commit to delivering to you from time to time.

Another legal basis is that some processing is necessary for the purposes of the legitimate interest that we have, as a firm that is authorised and regulated by the Central Bank of Ireland, in the proper administration and correct operation of our firm. There may also be circumstances where the legal basis for processing your personal data is consent (where we have sought it and it has been provided to us), in which case that consent may be withdrawn at any time.

In any event, the Company are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

The types of information we gather are per the following examples –
Aviation Hull/ Liability Insurance – your name, address, full aircraft details, pilot details, claims information, previous insurance(s) and how they were conducted etc.
Tradesman (Public/ Employers Liability) – your name, address, your trade, how long you have undertaken this trade for, details of your employees/ sub-contractors etc.

In general, you may visit our website without identifying yourself or revealing any personal information. the Company collects domain information from your visit to customise and improve your experience on our website.

The website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the Internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance.

Some portions of this website may request that you give us information about yourself, from which we are able to identify you, such as your name, email or other address.

How We Will Process Your Data -
The Company will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary.

Special Categories of Personal Data -
If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure that we will obtain your explicit consent.

Purpose For Processing Your Data -
When we collect information about you, we intend to tell you why we are asking for the information and what we intend to do with it. You will have the option of not providing the information however, you may not then be able to access certain services. We may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing. Data will not be held for longer than is necessary and general client details will be held while you are a customer.

The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to a Company product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt in'.

Who Are We Sharing Your Data With?
We are committed to only sharing your information with those to whom it needs to be shared in order to undertake the services you have requested from us i.e. Insurers and other Brokers we may use in order to facilitate the placement of your Policy of Insurance – there are certain exceptions to this i.e., the Civil Aviation Authority in order to confirm Insurance details of a particular aircraft or, the An Garda Síochána for the purposes of preventing fraud.

If we wish to pass your sensitive personal data onto a third party, we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

At present, the only Third Parties that we pass your personal data to are directly involved in the placement of your insurance(s) i.e. Insurers/ Managing Agents/ Other Brokers (or such like), the UK Civil Aviation Authority in respect of all "G" registered aircraft in order to provide confirmation of insurance, our Accountants and Auditors and relevant regulatory authorities. This may change at any time, and any such updates will be included within this document.

If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vest in the third party even though they are not a party to the contract of insurance. The third party has a right to recover from the insurer the amount of any loss suffered by them. Where the third party reasonably believes that you as policyholder have incurred a liability the third party will be entitled to seek and obtain information from the insurer or from any other person who is able to provide it concerning:

- the existence of the insurance contract,
- who the insurer is,
- the terms of the contract, and
- whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vest in the third party even though they are not a party to the contract of insurance. The third party has a right to recover from the insurer the amount of any loss suffered by them. Where the third party reasonably believes that you as policyholder have incurred a liability the third party will be entitled to seek and obtain information from the insurer or from any other person who is able to provide it concerning:

- the existence of the insurance contract,
- who the insurer is,
- the terms of the contract, and
- whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

Profiling – Automatic Decision Making -
In some cases, your quotation may be generated using an online Automated Decision-Making process; this means that the quote is generated using the data previously provided by you and applied to an internal logic or set of criteria, such logic/ criteria uses data such as your trade, claims history and turnover to determine the quote. If you feel that this Automated Decision-Making process has not adequately assessed your quote request, please advise as you do have the right to have that quote reviewed by a sufficiently senior member of staff.

Sharing Information with Third Parties -
In certain instances, we may make your information available to third parties with whom we have a relationship where that third party is providing services on our behalf in the course of dealing with you. We will only provide those third parties with information that is necessary for them to perform the services, and we take measures to protect your information.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with procedures set out by their regulatory body.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

The information we collect may be used, stored and processed in the EU or, UK or in any other country in which the Company does business. By providing information, you are consenting to the transfer of the information outside of your country to any country. If we transfer personal data to a third party or outside the EU, we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

The Company may disclose information it has collected about you if required to do so by law or when necessary to protect the rights of the Company or its employees.
Examples of the Third Parties that we may pass your personal data to are:
1. Insurers/ Managing Agents/ Other Brokers (or such like) involved in the placement of your insurance(s)
2. Regulatory Bodies
3. Government/ Law Enforcement Offices

Data Subject Rights -
The Company facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

Your Rights as a Data Subject –
At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling**
- **Right to judicial review:** in the event that the Company refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

If you provide data to us about other people you must provide this notice to them before you pass their data to us. You must obtain their consent if this includes sensitive data such as health or criminal record data.

If at any time you wish to know what information we hold on you, or have any queries relating to the above, please contact our director responsible for Data Protection.

Retention of your Personal Data -
Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. The Company will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland) and our internal governance.

Data Security -
The Company's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data.

However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

Failure to Provide Further Information -
If we are collecting your data for a contract and you cannot provide this data, the consequences of this could mean the contract cannot be completed or details are incorrect.

Additional Processing -
If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

How to Update and/or Amend the Personal Information You Have Provided -
You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure please email your request to the contact address below with proof of identity.

Business Relationships -
This website may contain links to other websites. The Company is not responsible for the privacy practices or the content of such websites. The Company may use pixels, transparent GIF files and other methods to help manage online advertising.

Complaints -
In the event that you wish to make a complaint about how your personal data is being processed by the Company or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and our data protection representatives Data Protection Officer/ GDPR Owner.

Contacting Us -
Your privacy is important to us. If you have any questions or comments about our privacy notice or practices, please contact us.

The Company may modify or update this privacy notice from time to time at any time without prior notice. You can check the "Last Updated" date below to see when the notice was last changed. We encourage you to check this notice often so that you can continue be aware of how we are protecting your personal information. Your continued use of the website constitutes your consent to the contents of this privacy notice, as it may be modified from time to time.

Email: office@altitudeinsuranceltd.com

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