DATA PROTECTION TERMS EXPLAINED

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")

In order to comply with the General Data Protection Regulations 2018, we would like to make you aware of the definition of the Data Protection terms utilised in our documentation: –

Automated Data means data held electronically or on computer.
Consent …of the data subject means a freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she by a statement or a clear affirmative action signifies agreement to the processing of personal data relating to him or her. (Art. 4(11) GDPR)
Data Subject means the individual about whom the personal data relates. For Brokers this means both your customers and staff.
Data Controller controls the data and its use. All Brokers are Data Controllers.
Data Processor processes the data on behalf of the Data Controller. Example payroll company.
Fair Processing has two distinct aspects and is not the same as having a legal basis for the processing: 1. You must be transparent with individuals about what you're doing with their personal data and why. 2. You must ensure you process personal information fairly. Broadly, this means you must process it in a way that individuals would reasonably expect.
In addition to having a legal basis for processing personal data, you must process it fairly.
Manual Data means data held on paper or hard copy but only if it is part of a "relevant filing system".
Personal Data means data: (S.63 DP Bill)

1. Relating to identifiable living individuals or
2. Which could identify a living individual by reference to the data, such as by an identifier (e.g. name, identification number, location data, online identifier), or by reference to a specific factor(s) such as the physical, physiological, genetic, mental, economic, cultural, social identity of the individual.
3. Includes criminal convictions and offences.
4. Includes both automated and manual data.

Processing includes anything done on or to data, so therefore covers:

1. Obtaining, recording or keeping data
2. Collecting, organising, storing, altering or adapting data
3. Retrieving, consulting or using data
4. Disclosing data by transmitting, disseminating or making available
5. Aligning, combining, blocking, erasing or destroying data

Profiling means: Any kind of automated processing which uses personal data to analyse or predict certain characteristics or preferences of an individual(s).
Relevant filing system means:

1. Structured by reference to individuals (e.g., alphabetically by name).
2. Organised in such a way that specific information relating to an individual is readily accessible.
3. So, if a file has an individual's name on the front, the content of that file is Personal Data. On the other hand, a file named "Miscellaneous" does not contain Personal Data.

Sensitive or Special Category Data means any personal data as to: (S.2 DP Bill)

1. Racial or ethnic origin
2. Political opinions or religious or philosophical beliefs
3. Trade union membership
4. Physical or mental health or condition or sexual life
5. Biometric data
6. Genetic data.

Note: Data relating to Criminal convictions and offences (including ongoing criminal proceedings) is no longer categorised as Sensitive data.

Last Updated – 01/11/2026