



This document explains how we use your personal data.

Westfield (Sub Aqua & Marine) Insurance Services Limited is committed to ensuring the privacy of our clients and other people that we have dealings with. In this policy we explain how we hold, process and retain your personal data.

## **1. How we use your personal data**

1.1 This section provides you with information about:

- (a) what personal data we hold and process;
- (b) in respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
- (c) the purposes for which we may process your personal data; and
- (d) the legal grounds on which we process your data.

1.2 **Contact data.** We may process contact details that you provide to us (“**contact data**“). This contact data may include your name, address, telephone number, and email address, and will be provided by you verbally, via a national network of Broker partners or through our websites. We may use this contact data to contact you to discuss your insurance needs, administrate claims/losses/complaints and how we performed and functioned for you. The legal basis for this processing is our legitimate interest in ensuring the efficient administration and continued function of our services.

We will pass information as required to various partner service providers, professional advisers and Third parties as required for performance of the contract in either producing an insurance quotation or ongoing arrangement of the policy.

1.3 **Profile Data.** During the course of providing services to you, you may provide us with biographical information about yourself (“**profile data**“). This profile data may include your date of birth, marital status, home address, length of residence in the UK, number of children, employment details, claim history (including details about any claims you have been subject to), details about any previous insurance policies you may have taken out.

We will use this data to provide you with a contract of insurance, and for providing our services to you. The profile data may be processed in this way for the purposes of performing our contract with you.

We will pass information as required to various bodies, partner service providers, professional advisers and Third Parties.

**1.4 Special Category Data.** During the course of using our services and providing us with information in order for us to arrange an insurance contract for you, you may provide us with information about yourself (“**Special Category**”). This data may include your medical history, and details of any previous convictions you may have had. We may use this data to provide you with insurance. However, we will only process this data if you consent to us doing so.

**1.5 Website data.** We may process data about your use of our website and services (“**website data**”). The website data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the website data is our analytics tracking system. This website data may be processed for the purposes of analysing the use of the website and services.

The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

**1.6 Correspondence data.** We may process information contained in or relating to any communication that you send to us (“**correspondence data**”). The correspondence data may include the communication content associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

**1.7 Other processing activities.** In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person’s personal data to us, unless we prompt you to do so or have entered into a written data processing agreement with you.

## **2. Providing your personal data to others**

**2.1 Our partner service providers.** We may disclose your data to the insurers, and other partner organisations that we work with.

**2.2 Our professional advisers.** We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice and managing legal disputes.

**2.3 Where we provide your personal data to any third party.** Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.

**2.4 To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

## **3. Transfers of your personal data outside of the European Economic Area**

Where your personal data is transferred outside of the EEA, we will ensure that either (a) The European Commission has made an “adequacy decision” with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.

## **4. Retaining and deleting personal data**

**4.1** Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. However, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, for our legitimate interests, or in order to protect your vital interests or the vital interests of another natural person. Details of our retention periods can be found in our "Document and Data Control Policy", a copy of which is freely available on request at any time by emailing [nick@divinginsuranceuk.com](mailto:nick@divinginsuranceuk.com)

## 5. Amendments

5.1 We may update this policy from time to time by publishing a new version on our website.

5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

5.3 We may notify you of changes to this policy by email or mail.

## 6. Your rights

6.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) your request not being found to be unfounded or excessive, in which case a charge may apply; and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

6.2 We may withhold personal information that you request to the extent permitted by law.

6.3 The rights you have under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.4 **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold

and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.

**6.5 Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.

**6.6 Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. We will analyse each request for erasure and we will agree if there is no legitimate reason to retain the data to the normal retention period, at which point we will instruct anonymisation of the data.

**6.7 Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

**6.8 Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

**6.9 Your right to object to direct marketing.** You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

**6.10 Your right to data portability.** Where you have given us consent to process your personal data for the performance of a contract, you have a legal right to receive a copy of the personal data we hold about you. We will not be accepting Data Portability files from other third party companies/individuals. When a data request is made of us we will make available all applicable personal data to you in a .CSV file or alternative machine readable format agreed by us to be passed to the appropriate third party on your instruction. We will not however process your data in this way if we believe that it may pose a threat to the security of the data.

**6.11 Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.

**6.12 Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

**6.13 Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

**6.14 Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

**6.15 Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

## **7. Cookie Policy**

## Visitors to our websites

When someone visits our site, we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. We will not associate any data gathered from this site with any personally identifying information from any source. We will make it clear when we collect personal information and will explain what we intend to do with it.

## Our use of cookies

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 site.

The table below explains the cookies we use and why:

### Cookie list

#### Google Analytics

Names: `_gid`, `_gat_UA`, `_ga`

Purpose: These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

More info: [Google's privacy and security overview](#).

#### Google Remarketing

Purpose: Google uses these cookies to show relevant adverts to users who have previously visited our website, as they browse other websites.

More info: [Edit your Google Ad Settings](#).

#### Reviews cookie

Names: `_asc`, `_auc`, `ajs_anonymous_id`, `ajs_group_id`, `ajs_user_id`, `amplitude_id_67f7b7e6c8cb1b558b0c5bda2f747b07trustpilot.com`, `amplitude_idundefinedtrustpilot.com`

Purpose: Used to display reviews from Trust Pilot.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

#### Service Activity Logging

Our application has the capability to monitor your actions while using our service. We use this information to understand the use of our services, to diagnose problems and enhance the features and functionality of our service.

#### Exceptions

Except as described above, we will not otherwise use or disclose any personally identifiable client information, except to the extent reasonably necessary:-

- To correct technical problems and to technically process your information
- To protect the security and integrity of the web site and our service
- To protect our rights and property and the rights and property of others
- To take precautions against liability
- To respond to claims that your information violates the rights or interests of third parties
- To the extent required by law or to respond to judicial process or
- To the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety, as applicable

You understand and agree that technical processing of your information is and may be required (a) to send and receive messages in your use of the Service; (b) to conform to the technical requirements of connecting networks; (c) to conform to the limitations of our Service; and (d) to conform to other, similar technical requirements.

### **8. Our details**

8.1 This website is owned and operated by Westfield (Sub Aqua & Marine) Insurance Services Limited.

8.2 We are registered in England and Wales under registration number 450587, and our registered office is at 14 Lambourne Drive, Bagshot, Surrey, GU19 5BY and we are regulated by the Financial Conduct Authority, Reference Number 310385.

8.3 You can contact us:



- (a) by post, using the postal address; 14 Lambourne Drive, Bagshot, Surrey, GU19 5BY.
- (b) using our website contact form;
- (c) by telephone 01483 237827
- (d) by email, [nick@divinginsuranceuk.com](mailto:nick@divinginsuranceuk.com)

## **9. Data protection officer**

Our data protection officer is: Nicholas Caldwell who can be contacted as above.