



**American  
Hellenic Hull**  
Insurance Company

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# Privacy Policy

January 2019

## Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation (EU) 2016/679 (commonly known as the GDPR), which applies across the European Union and we are responsible as 'controller' of that personal information for the purposes of those laws.

## Key terms

It would be helpful to start by explaining some key terms used in this policy:

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| We, us, our                                | American Hellenic Hull Insurance Company Ltd is an insurance undertaking licenced by the Superintendent of Insurance of the Republic of Cyprus to offer insurance services under Class 6 ("AHHIC"). This privacy notice is issued on behalf of AHHIC so when we mention "we", "us" or "our" in this privacy notice, we are referring to AHHIC. |
| Personal information                       | Any information relating to an identified or identifiable individual   |
| Special categories of personal information | Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership<br>Genetic and biometric data<br>Data concerning health, sex life or sexual orientation   |

## Personal information we collect about you

We may collect and use the following personal information about you:

- Identity Data which includes your first name and last name, title, date of birth and gender and Information that enables us to check and verify your identity.
- Contact Data which includes your address, email address and telephone number.
- Financial Data which includes payment account details.
- Transaction Data which includes details about payments to and from you and other details of insurance products and services you have purchased from us.
- Marketing Data which includes your personal interests and preferences in receiving marketing from us.

We do not usually collect any Special categories of personal information about you nor do we collect any information about criminal convictions and offences. Where there is good reason to collect or process such personal information, we will inform you of the reason in advance and we will only process it with your explicit consent.

Where we need to collect personal information by law, or in order to be able to provide our products or services to you and you fail to provide that information when requested, this may prevent or delay us from providing our products or services to you. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

## **How your personal information is collected**

We collect most of this personal information directly from you—in person, by telephone, text or email and via our website. However, we may also collect information:

- From the insured to which you are related;
- from publicly accessible sources;
- directly from a third party, eg our managers, brokers or other intermediaries providing services on our behalf
- from cookies on our website—for more information on our use of cookies, please see our cookies policy
- via our IT systems.

## **How and why we use your personal information**

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- provide insurance to you or to the entity to which you represent and for activities relating to that insurance including claims and renewals;
- to our legal and regulatory requirements;
- provide you with the information, products and services that you request from us;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- administer our relationship and to communicate with you;
- check your instructions to us;
- investigate any complaint you may make;
- provide evidence in any dispute or anticipated dispute between you and us;
- provide you with marketing information where you have consented to direct marketing;
- notify you about changes to our insurance products and services;
- monitor the quality of our insurance products and services;
- aggregate it on an anonymous basis with other data for data analytical and reporting purposes;
- for our legitimate interests or those of a third party, where your interests and fundamental rights do not override those interests; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and the legal bases which we rely on to do so:

| What we use your personal information for  | Type of information   | Lawful basis for processing   |
|--|---|---|
| <p>To provide our products and services to you including:</p> <p>(a) to provide insurance:<br/>(b) manage payments,<br/>(c) collect and recover money owed to us</p>   | <p>(a) Identity Data<br/>(b) Contact Data<br/>(c) Financial Data<br/>(d) Transaction Data</p> | <p>(a) Performance of a contract with you or to take steps at your request before entering into a contract<br/>(b) Necessary for our legitimate interests (record and administer our transactions)<br/>(c) Necessary to comply with our legal and regulatory obligations</p>  |
| <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to how our business or the way we deal with you<br/>(b) Updating the information we have about you</p>             | <p>(a) Identity Data<br/>(b) Contact Data</p>   | <p>(a) Performance of a contract with you or to take steps at your request before entering into a contract<br/>(b) Necessary to comply with our legal and regulatory obligations<br/>(c) Necessary for our legitimate interests (to inform you about our business, keep our records updated and to study how customers use our products/services)</p> |
| <p>To run, administer and protect our business which will include:</p> <p>(a) Ensuring business policies are adhered to,<br/>(b) operational reasons, such as improving efficiency, training and quality control</p> | <p>(a) Identity Data<br/>(b) Contact Data<br/>(c) Financial Data<br/>(d) Transaction Data</p> | <p>(a) Necessary for our legitimate interests (for running, administering and protecting our business, monitoring and improving our business, making sure we are following our own internal procedures and working efficiently, preventing and detecting fraud unauthorised access and modifications to systems, and in the context of a business</p> |

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| <p>(c) preventing and detecting fraud</p> <p>(d) preventing unauthorised access and modifications to systems</p> <p>(e) statistical analysis to help us manage our business,</p> <p>(f) Ensuring safe working practices, staff administration and assessments</p> |  | <p>reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with our legal and regulatory obligations</p>   |
| <p>Gathering and providing information and making filings required by law or relating to audits, enquiries or investigations by regulatory bodies or authorities</p>  | <p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Financial Data</p> <p>(d) Transaction Data</p> | <p>(a) Necessary to comply with our legal and regulatory obligations</p> <p>(b) Necessary for our legitimate interests (for protecting our rights and defending ourselves in the context of audits, enquiries or investigations administration)</p> |
| <p>External audits and quality checks</p>   | <p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Financial Data</p> <p>(d) Transaction Data</p> | <p>(a) Necessary to comply with our legal and regulatory obligations</p> <p>(b) Necessary for our legitimate interests (for maintaining our accreditations and operating at the highest standards)</p>  |
| <p>To improve our website, products/services, marketing, customer relationships and experiences</p>   | <p>(a) Transaction Data</p> <p>(b) Marketing Data</p>  | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>                                  |
| <p>Marketing our business and making suggestions and recommendations to you about products or</p>   | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing Data</p>                                       | <p>(a) Your consent</p> <p>(b) Necessary for our legitimate interests</p>   |

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| services that may be of interest to you |  |  |
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The above table does not apply to special category personal information, which we will only process with your explicit consent.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Promotional communications

We may use your personal information to send you updates (by email, telephone or post) about our products and services, including new products and services.

We rely on your consent to send you promotional communications and we will ask for this consent separately and clearly.

Where you have provided your consent for promotional communications, you have the right to withdraw it at any time by:

- emailing, calling or writing to us—see below: **'How to contact us'**
- using the 'unsubscribe' link in emails

We will always treat your personal information with the utmost respect and never share it with other organisations outside our group for marketing purposes.

## Who we share your personal information with

We may share your personal data with our professional advisers, insurance brokers and other third parties who help us provide insurance products and services to you. For example we may share your personal data with:

- to comply with the law or rules of any regulatory body whose rules apply to AHHIC;
- with other insurers and financial institutions to prevent and detect fraudulent and exaggerated claims;
- with our managers and other third-party administrators to assist us in the administration of your insurance policy or any claim you may make under it;
- with companies that perform marketing purposes on our behalf;
- with the insurance broker that is assisting you so that they can advise and provide their services to you;
- third parties who perform business services for us or provide their services to us, such as document retention/storage services, printing services and mailing services;

- with reinsurers who help to manage our business and reduce the risks associated with underwritten insurance policies by spreading our risks across alternative institutions;
- with insurance brokers who help us arrange insurance for you;
- with banks and intermediaries who sell our insurance products and services for us; and
- with professional advisors and consultants, including legal advisors, and our external auditors.

We only allow third parties to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## Where your personal information is held

Information may be held at our offices, brokers, third party service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

## How long your personal information will be kept

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will usually keep your personal information while you have an account with us or we are providing products or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you in accordance with the law; and
- to keep records required by law.

Different retention periods apply for different types of personal information. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## Transferring your personal information out of the EEA

To deliver our services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and Cyprus data protection law.

Whenever we transfer your personal information out of the EEA, we ensure a degree of protection similar to that afforded in EEA countries is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.
- Where we transfer your personal information to countries that have not been deemed to provide an adequate level of protection for personal information by the European Commission, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the Europe and the US.

If you would like further information please contact us (see 'How to contact us' below).

## Your rights

You have the following rights in relation to your personal information:

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| Access          | The right to be provided with a copy of your personal information.   |
| Rectification   | The right to require us to correct any mistakes in your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us. |
| To be forgotten | The right to require us to delete your personal information (in certain circumstances). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to  |



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|   | delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.   |
| Restriction of processing                                 | The right to require us to restrict processing of your personal information (in certain circumstances). This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it. |
| Data portability  | The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.   |
| To object   | The right to object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.  |
| Not to be subject to automated individual decision-making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.   |
| Withdraw consent  | The right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or  |

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|  | services to you. We will advise you if this is the case at the time you withdraw your consent. |
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For further information on each of those rights, including the circumstances in which they apply, please contact us or visit the website of Commissioner for the Protection of Personal Data ([www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: **‘How to contact us’**; and
- let us have enough information to identify you;
- let us have proof of your identity; and
- let us know what right you want to exercise and the information to which your request relates.
- You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Cyprus is the Commissioner for Personal Data Protection who can be contacted at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy); [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy).

## Changes to this privacy policy

This privacy notice was published on 2016 and last updated on 1/1/2019.

We may change this privacy notice from time to time—when we do we will post the updated privacy notice on our website.

## How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

| <b>Our contact details</b>   | <b>For GDPR matters</b>   |
|--|---|
| 4, Kallitheas Street, Imperial House,<br>2nd floor, office 202<br>CY – 3086 Limassol<br>E.: <a href="mailto:info@ahhic.com">info@ahhic.com</a><br>Tel.: +357 255 84545 | E.: <a href="mailto:gdpr@ahhic.com">gdpr@ahhic.com</a><br>Tel.: +30 211 1020400 |