

## Altitude Insurance Ltd

General Insurance Intermediary  
Director – Laura Durcan

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www.altitudeinsuranceltd.com



**ALTITUDE INSURANCE LTD.**  
General Insurance Intermediary

Altitude Insurance Ltd 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 correspondence and on our website. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to general insurance products.

To provide you with relevant information, respond to your requests we sometimes request that you provide us with information about yourself.

This Privacy Notice will inform you of the information we gather and how it is used. Altitude Insurance Ltd 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. Altitude Insurance Ltd 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 Altitude Insurance Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Altitude Insurance Ltd
- Contact details of Laura Durcan
- When we refer to 'we' it is Altitude Insurance Ltd


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

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

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.

## What Information We Gather

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 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.

Our reason (lawful reason/ legal basis) for processing your data under the GDPR is: Altitude Insurance Limited needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In general, you may visit our website without identifying yourself or revealing any personal information. Altitude Insurance Ltd 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.

## Use of the Information We Gather

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We 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.

We 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.

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.

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 an Altitude Insurance Ltd product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt in'.

## Sharing Information with Third Parties

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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 fulfill 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 Altitude Insurance Ltd 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.

Altitude Insurance Ltd may disclose information it has collected about you if required to do so by law or when necessary to protect the rights of Altitude Insurance or its employees.

Examples of the Third Parties that we may pass your personal data to are:

1. Insurers
2. Regulatory Bodies
3. Government/ Law Enforcement Offices

## Data Subject Rights

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Altitude Insurance Ltd facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

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** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that we refuse 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.

## Retention of your Personal Data


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Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Altitude Insurance Ltd 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

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Altitude Insurance Ltd'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

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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

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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

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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

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

## Complaints

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In the event that you wish to make a complaint about how your personal data is being processed by Altitude Insurance Ltd 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


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

Altitude Insurance Ltd 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](mailto:office@altitudeinsuranceltd.com)

Last Updated – 6<sup>th</sup> May 2020



Altitude Insurance Ltd may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services, you agree to this privacy policy.