

Privacy Policy

General Data Privacy Notice

Legal framework for protecting your personal data

This data privacy notice is written to comply with the European Union General Data Protection Regulation (GDPR). GDPR gives control to citizens and residents over their personal data.

Data Controller

Name: Aries Marine Insurance Brokers Ltd.

Phone: +357 222 00 999

+30 212 213 4330

• Email: info@ariesmarine.eu

Address: 57, John Kennedy Avenue, 1076, Nicosia, Cyprus

6, Agiou Ioannou Street, Chalandri, GR 152 33, Athens, Greece

Data Protection Officer

Name: Despina Kalfa

Phone: +30 6932 617 422

• Email: dkalfa@ariesmarine.eu

• Address: 6 Agiou Ioannou Str. GR 152 33 Chalandri, Athens, Greece

Data Controller's Lines of Business

Aries Marine Insurance Brokers Ltd. is the data controller for all lines of businesses under ownership or management.

How data is used

Aries Marine Insurance Brokers Ltd. may process personal information as part of its insurance and financial services businesses: underwriting, reinsurance, claims, legal services, loss prevention, wealth management, document processing, finance, marketing, renewals, contract review, risk management and employment.

Personal data profile categories processed

Aries Marine Insurance Brokers Ltd. maintains personal data for:

- 1. Business Insurance contacts
- 2. Advisers, consultants and other professional experts
- 3. Subjects of claims, investigations, proceedings etc.



- 4. Business associates, other professional bodies, advisers
- 5. Complainants and enquirers
- 6. Customers and clients
- 7. Employees
- 8. Employers and employees of other organisations
- 9. Clients and beneficiaries
- 10. Offenders and suspected offenders
- 11. Relatives, guardians
- 12. Shareholders
- 13. Suppliers and services providers
- 14. Subjects of claims, investigations, proceedings and other claim related profiles
- 15. Trustees
- 16. Witnesses

Automated decision making

Aries Marine Insurance Brokers Ltd. does not use automated decision making.

The legal basis we use for lawful processing

In order for Aries Marine Insurance Brokers Ltd. to conduct business and fulfil its legal, regulatory and contractual obligations, it needs to perform legitimate and fundamental processing. These are:

- 1. Establishing insurance contracts
- 2. Maintaining insurance contracts
- 3. Provision of all contracted services
- 4. Invoicing, remittance, payments, collections
- 5. Non-promotional communications
- 6. Marketing and other promotional communications
- 7. Risk management contract review
- 8. Response to Subject Access Request
- 9. Performance measurement
- 10. IT support services



- 11. Business Continuity Planning
- 12. Legal and regulatory obligations
- 13. Responding to enquiries, requests and complaints
- 14. Employment processing

The categories of people who will access or receive the data

Aries Marine Insurance Brokers Ltd. sometimes needs to share the personal information it processes with individuals themselves and also with other organisations. Below is a description of the types of organisations with which Aries Marine Insurance Brokers Ltd. may need to share some of the personal information it processes.

- 1. P&I Clubs of the International Group
- 2. Marine Underwriters / Fixed Premium P&I Insurers
- 3. P&I Clubs' Correspondents
- 4. Agents and brokers
- 5. Business associates, other professional bodies, advisers
- 6. Central / local government
- 7. Claimants, beneficiaries, assignees and payees
- 8. Claims investigators
- 9. Complainants, enquirers
- 10. Courts and tribunals
- 11. Credit reference, debt collection and tracing agencies
- 12. Current, past and prospective employers
- 13. Customers and clients
- 14. Data processors
- 15. Debt collection and tracing agencies
- 16. Employment and recruitment agencies
- 17. Family, associates and representatives of the person whose personal data we are processing
- 18. Financial organizations and advisers
- 19. Healthcare professionals, social and welfare organizations



- 20. Law enforcement and prosecuting authorities
- 21. Regulatory Authorities
- 22. Pension schemes / social security institutions
- 23. Police forces / Port State Controls
- 24. Private investigators
- 25. Professional advisers
- 26. Share Administrators
- 27. Suppliers and services providers
- 28. Survey and research organizations
- 29. Trade associations, professional bodies, employer associations

The countries where data will be stored, processed and transferred

Your personal data collected by Aries Marine Insurance Brokers Ltd may be stored and processed in Cyprus and Greece or any other country in which associated third parties maintain facilities.

Should Aries Marine Insurance Brokers Ltd need to transfer your personal data, Aries Marine Insurance Brokers Ltd will take all reasonable measures to safeguard the transfer of your personal data to third parties in a manner that complies with the GDPR.

How long the data will be retained

Retention of specific records may be necessary for one or more of the following reasons:

- 1. To fulfil statutory or other regulatory requirements.
- 2. To evidence events/agreements in case of disputes.
- 3. To meet our operational needs.
- 4. To meet any historical purposes.

Personal data that is collected and subsequently never used for any business purpose will be reviewed and may be destroyed at Aries Marine Insurance Brokers Ltd discretion.

What happens if the data isn't collected

Your personal data is required for communication and setting up a contractual agreement to provide products and services. Without this data Aries Marine Insurance Brokers Ltd will not be able to communicate with you or enter into a contractual agreement with you. This includes both business and employment contracts.



Aries Marine Insurance Brokers Ltd needs personal data to:

- 1. enable consensual bilateral communications;
- 2. engage in pre-contractual activities;
- 3. honour contractual obligations; and
- 4. enable it to employ people.

Without this data, Aries Marine Insurance Brokers Ltd will not be able to perform these four primary activities.

The right to withdraw consent

In situations where Aries Marine Insurance Brokers Ltd requests and receives your consent to perform processing, we are also obliged to stop such processing if you decide to withdraw your consent. Withdrawing consent is as straightforward as giving consent. Withdrawing consent cannot be back-dated so it has no effect on processing already performed during the period of consent.

The right to access, change, delete, restrict, object, request a copy

You have rights regarding the personal data we store on your behalf. These are:

- 1. access to a copy of your personal data;
- 2. object to processing that you object to;
- 3. object to decisions being taken by automated means;
- 4. have inaccurate personal data rectified, blocked, erased or destroyed;
- 5. file a complaint with the Information Commissioner's Office;
- 6. claim compensation for damages caused by a breach of the GDPR.

Should you ever wish to exercise any of these rights, please contact the Data Protection Officer.

The right to complain to the regulator

You have the right to file a complaint with the Information Commissioner's Office if you think that your personal data has been inappropriately used.

Third Party Companies

We use third party companies as suppliers for some of our functions. Their use of the data is controlled by our contract with them and they are only allowed to use the data strictly for the purpose we have stated.





Other Websites

This privacy policy only covers Aries Marine Insurance Brokers Ltd website. Any other websites to which our website may provide links to, may be subject to their own privacy policy, which may differ from ours and we are not responsible for the content provided on any third party web sites.