



a Trading Division of  
Swedish Sea & Air Claims AB

## GDPR Privacy Policy

01-01-2020

In this GDPR Privacy Policy, we describe how we process information that, directly or indirectly, can identify a living natural person. For more information and/or to exercise your rights as a data subject, our contact details can be found at the end of this document.

### 1. DEFINITIONS

**Client** means any natural person who uses, has used or has expressed a wish to use the Services or is in any other way related to the use and/or user of the Services provided by the Company.

**Company** means Swedish Sea & Air Claims AB and its Trading Division NORDIC AIRCLAIMS.

**Data Controller** means a legal entity, who alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

**Data Protection Legislation** means the applicable data protection legislation such as Regulation (EU) 2016/679 (General Data Protection Regulation “GDPR”) and national legislation implementing the GDPR.

**EU/EEA** mean the European Union/European Economic Area.

**Regulatory Legislation** means the applicable rules and legislation, for example regarding insurance contracts, insurance brokers, accident investigation and bookkeeping.

**Personal Data** or **PD** means any information that, directly or indirectly, can identify a living natural person.

**Processing** means any operation or set of operations performed with regard to Personal Data, whether or not performed by automated means, such as collection, recording, organisation, storage, adaptation, alteration, retrieval, gathering, use, combination, blocking, erasure or destruction.

**Recipient** means a natural or legal person, public authority or another body, to whom Personal Data may be disclosed by the Company.

**Services** means any of the Company’s services such as advice and products relating to insurance, claims handling, surveying and loss adjusting.



## 2. GENERAL PROVISIONS

This document describes how the Company processes PD. Specific details and information on the processing of PD may also be described in agreements, on our websites and in other documents related to our Services.

The Company ensures, within the framework of Data Protection Legislation, the confidentiality of PD and has implemented appropriate technical and organisational measures to safeguard PD from unauthorized access, unlawful disclosure, accidental loss, modification, destruction or any other unlawful processing.

## 3. PROCESSING of PERSONAL DATA

### 3.1 Collection of Personal Data and categories of data subjects

PD may be collected from the Client directly, from the Client's use of the Services and from external sources such as public and private registers or other providers of databases. The Company may also record telephone calls, images and/or audio, save e-mail communication or otherwise document the Client's interaction and communication with the Company.

The Company primarily collects and Processes PD about natural persons who have entered into an agreement with an Insurance provider, and subsequently filed a claim for compensation. In such cases PD may be collected from the Insurance provider or any of its representatives. The Company also collects and Processes PD about natural persons from customers, prospect customers, administrators, agents, legal representatives, corporate representatives, signatories, shareholders, stakeholders, contact persons, board members, beneficial owners and visitors of the Company's offices and events.

### 3.2 Categories of Personal Data

Categories of PD that the Company collects and Processes are:

**Identification and contact data** such as name, personal identification code/number, date of birth, data regarding identification documents, address, telephone number, email address, country of residence.

**Financial data** such as bank account details, ownership, income, debts.

When providing Services relating to **Insurance claims** the Company may collect data relating to car, boat and aircraft registration numbers, serial numbers, ownership, lien holders, drivers, boat and flight crew licenses, medical certificates, log books, flightplans, airworthiness, family relationships, relatives, beneficiaries and heirs.

**Communication & Services data** collected when the Company communicates with the Client for Service related purposes such as information gathering, surveys, events, complaints, via telephone, images and/or audio recordings, e-mails, messages and other communications such as social media and data related to the Client's visit at the Company's websites.

**Special categories of Personal Data** such as data related to the Client's health.

To be able to provide the Services, the Company may in some cases Process special categories of PD. The Company may ask for the Client's consent when Processing special categories of PD, for example, when information is required for the Services related to Personal Accident Insurance or Liability Insurance. The Company may also Process special categories of PD if required for exercise of a legal claim, or if the Company is required by a legal obligation or a.

## 4. LEGAL BASIS and PURPOSES

### 4.1 Performance of agreements

The main purpose of the Company's Processing the Client's PD is to document, conclude, execute, administer and terminate agreements with the Client.

#### 4.2 Legitimate interest

The Company Processes the Client's PD for the Company's legitimate interest. The Company has considered this Processing to be necessary for the purposes of the legitimate interest pursued by the Company, which the Company have considered outweighing the Client's interest of protection of the PD. Examples of purposes for Processing are:

- To protect the interests of the Client. When, for example, the Client is an Insured who claims compensation from an Insurer, we, in our capacity as being the eyes and the ears of the Insurer, believe it is the interest of the Client to let us collect, document, process and transfer the information that the Client is legally and contractually obliged to share with the Insurer.
- To communicate with third parties to provide assistance to the Client. This may be done by contacting repair workshops asking for advice or quotes.
- To prevent, limit and investigate any misuse or unlawful use or disturbance of the Services.
- To ensure adequate provisions of the Services, the safety of information within the Services, as well as to improve, develop and maintain applications, technical systems and IT-infrastructure.
- To establish, exercise and defend legal claims and to handle complaints.

#### 4.3 Consent

The Company will in some cases ask for the Client's consent to Process PD. Before giving consent, the Client will be presented with information on the Processing. Consent can always be withdrawn, and the Client will be informed of any consequences of such withdrawal.

### 5. COOKIES

No cookies are used by the Company when the Client visits the Company's websites.

### 6. RECIPIENTS of PERSONAL DATA

As part of Processing the Company may share the Client's PD with Recipients such as authorities, companies, suppliers, payment service providers and business partners. The Company will not disclose more PD than necessary for the purpose of disclosure and only in accordance with Regulatory Legislation and Data Protection Legislation.

Recipients may Process the Client's PD based on Regulatory Legislation and Data Protection Legislation. When Recipient is Processing PD, the Recipient may be responsible for providing information on such Processing of PD.

The Company may disclose PD to Recipients, such as:

- Authorities such as supervisory authorities, aviation authorities and law enforcement agencies.
- Insurance providers, insurance brokers, third parties participating in the execution, settlement and reporting cycle.
- Financial, legal and IT consultants, auditors or any other service providers of the Company.
- Providers of databases and registers, for example credit registers, population registers, commercial registers, securities registers or other register holding or intermediating PD, debt collectors and bankruptcy or insolvency administrators.
- Credit reference agencies and credit report companies.
- Suppliers, for example of IT and networks.

### 7. GEOGRAPHICAL AREA of PROCESSING

The Client's PD is Processed within the EU/EEA, and in some cases transferred to and Processed in countries outside of the EU/EEA.

The transfer and Processing of PD outside of the EU/EEA can take place provided there is a legal basis and appropriate safeguards are in place. Appropriate safeguards may be:

- An agreement including the EU Standard Contractual Clauses or other approved clauses, code of conducts, certifications approved in accordance with GDPR.



- The country outside of the EU/EEA where Recipient is located has an adequate level of data protection as decided by the EU Commission.
- The Recipient is certified under the Privacy Shield (applies to Recipients located in the United States).

In the absence of an adequacy decision, or of appropriate safeguards, a transfer of PD to a third country may take place when:

- The Client has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the Client due to the absence of an adequacy decision and appropriate safeguards.
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Client between the Company and another natural or legal person.

Upon request, the Client can receive further details on PD transfers to countries outside of the EU/EEA.

## 8. RETENTION PERIOD

PD will not be retained longer than necessary for the purposes for which the PD is Processed or required by Regulatory Legislation or Data Protection Legislation. PD may be retained for pursuing the Company's legitimate interest. Data retention requirements in Regulatory Legislation may be subject for national law and therefore may differ depending on country.

With respect to aviation claims the Company will retain and keep in safe storage PD relating to the Services for a minimum period of ten years from the date of loss to which the claim relates or six years from the date that the claim was finally settled, whichever period expires later.

## 8. RIGHTS AS a DATA SUBJECT

The Client has rights as a data subject regarding the Company's Processing of PD under Data Protection Legislation. Such rights are in general:

- To request access to, rectification and erasure of the Client's PD.
- To object to Processing of the Client's PD.
- To restrict the Processing of the Client's PD.
- To receive the PD that is provided by the Client and is being Processed based on consent or performance of an agreement in written or commonly used electronical format and were feasible transmit such data to another service provider (so called "data portability").
- To withdraw the consent to Process the Client's PD.

As a Client you can lodge complaints pertaining to the Company's Processing of PD to the Data Protection Authority ([www.datainspektionen.se](http://www.datainspektionen.se)) if you consider that Processing infringes on your rights and interests under Data Protection Legislation.

## 9. CONTACT DETAILS

You may contact the Company with enquiries, requests for register extracts, withdrawal of consent or to exercise other data subject rights, including complaints regarding the Processing of your PD.

The Data Controller responsible for your personal information is

**Swedish Sea & Air Claims AB**

ATTN: Data Protection Officer

Box 3

185 21 Vaxholm

SWEDEN

Telephone: +46 (0)76 800 8817

Email: [info@ssac.se](mailto:info@ssac.se)

If you have any questions about this GDPR Privacy Policy or our data collection practices, please contact us at the address, telephone number or email listed above and specify your country of residence and the nature of your question.