

Privacy policy for Members, Insured Parties, Suppliers etc. of the NNPC

May 2019

This is the Privacy Policy (hereinafter referred to as '**Policy**') of the Mutual Insurance Association 'Noord Nederlandsche P&I Club' U.A., and organisations in which NNPC has a majority interest, namely NNPC Rechtsbijstand B.V., NNPC Expertise B.V. and NNPC logistics BV, hereinafter referred to as '**NNPC**'. NNPC is responsible for the processing of personal data. This Policy applies to Members, Insured Parties, Suppliers etc. of the NNPC.

The Policy provides you with information about the processing of your personal data and any other ways your personal data is being handled by us. If you have any questions after reading this Policy, please contact us using the contact details in the last paragraph of this Policy.

We handle your personal data with care, ensuring that any processing of your personal data complies with applicable laws and regulations. We aim to protect your privacy, while providing you with the best possible personal service.

Types of personal data

We process a wide range of personal data. The types of data that may be processed include:

- Name of the company and information regarding the vessels, their cargo and security
- Information concerning the legal owner of the vessels, such as name, full address of the company, website, and any co-assured parties
- Information regarding the contact(s) within the company, such as full name, initials, gender, and position
- Information regarding brokers, agents, lawyers and the person handling the damage, such as full name, initials, gender, and position
- The names of any experts involved
- The seamen's names, dates of birth, identity cards or seaman's book numbers, if necessary for the settlement of claims
- The seamen's employment conditions
- Medical reports, where necessary
- Photos and/or video footage of the incidents
- Witness statements
- Contact details, such as the business address, e-mail address, telephone and fax number(s)
- Your NNPC file number
- Your IP address in case you visit our website
- Information about any compensation payments
- Information regarding the vessel's certification
- Photos and video footage of the damage
- Information included in relevant correspondence
- Photos of events
- Other information provided in connection with purchasing a product or the settlement of a claim.

Use of personal data

We collect your personal data when, among other things, you provide us with your personal data via our website (e.g. via the contact form), register for an insurance policy, report damage to us or register for our newsletter.

We will use your personal data only for the purposes for which you have provided us with your personal data. If, for example, you provide your personal data in relation to:

- a request for information about our services and products, we will process your personal data only to comply with that request;
- taking out an insurance policy or reporting a claim, we will process your personal data only for the purpose of the acceptance process, the execution of the insurance policy/policies requested by you, the collection of premiums for this/these insurance policy/policies, and the (financial) settlement of the damage reported by you;
- receiving our newsletter and invitations to our events, we will process your personal data only to send you our newsletter or an invitation to an event.

In addition, we will use your personal data to inform you about our products and services that may be of interest to you and to send out survey forms for our customer satisfaction surveys. The legal bases for the processing of your personal data for these purposes are the execution of an agreement, the legitimate interests of NNPC and, in some cases, your consent. If you do not wish to receive such information, please contact us. You will find our contact details at the end of this Policy.

The aforementioned purposes (reasons) for the processing of your personal data also constitute the legal bases for this processing, namely the need for processing: (i) Executing our agreement with you (ii) Pursuing our legitimate interests in sound and efficient business operations (iii) Your consent and (iv) complying with our legal obligations. To the extent that the legal basis for processing your personal data is the legitimate interest in our business operations, we will always take your interest in the protection of your privacy into account.

Access to your personal data and providing your personal data to third parties

Your personal data are accessible to NNPC employees who require said access to perform their duties and for the above-mentioned purposes.

Your personal data are accessible to third parties who are involved in the execution of the insurance contract. Examples of these parties are reinsurers, experts and lawyers. If a third party has access to your personal data, NNPC will sign an agreement with this party. This agreement include a description of the process of personal data of NNPC in the execution of the agreement as referred to in the AVG.

Your personal data are stored with, and therefore accessible to, Accent. Accent is our network administrator who also takes care of the secure storage of all our data. Our website administrator also has access to the data that you provide to us via our website, including the details you enter in the contact form. We arranged an agreement with third parties to ensure confidential data processing.

Retention period

Personal data will not be kept longer than necessary for the purposes for which they are collected or processed. The retention period may vary per (category of) personal data. The attached annex sets out and specifies the retention period per category.

Security of personal data

NNPC has taken appropriate technical and organisational measures to protect your personal data against loss or unlawful processing, including but not limited to password protection, secure data storage, a physical safe and an alarm to protect the building.

No cookies

Instead of cookies, our website uses log files. These log files provide us with the following information: IP address(es), pages you have visited, the browser and the time of your visit to our website.

Right to information, access and correction

You have the right to view your own personal data and/or to correct, supplement, delete and/or restrict your personal data, and to object to the processing of your personal data. In addition, as of 25 May 2018, you will have the right to limit the processing of your personal data and the right to the portability of your personal data on the basis of the General Data Protection Regulation.

In addition to the above rights, you have the right to submit a complaint regarding the processing of your personal data to the Dutch Data Protection Authority at any time.

If this Policy states that the processing of your personal data is based on your consent, as in the case of sending newsletters, you have the right to withdraw your consent. The withdrawal of your consent does not affect the lawfulness of the processing of your personal data prior to the withdrawal of your consent.

Policy changes

We reserve the right to change this Policy. Such changes will be announced on our website. We advise you to regularly visit our website to see if any changes have been made.

Contact and questions

If you would like to know more about this Policy, your rights, the processing and our further handling of your personal data, and our approach towards the processing of your personal data and/or privacy in general, please contact:



Compliance Officer
Rijksstraatweg 361
9752 CH Haren (Groningen)
e-mail: compliance@NNPC.nl
telephone number: +31 (0)50 534 3211

Annex B: Retention policy

Personal data	Purpose of retention	Commencement retention period	Minimum retention period	Maximum retention period
Personal information job applications	<ul style="list-style-type: none"> - Assessing suitability application - Payment of applicant incurred costs - Internal review and security - Statutory or regulatory requirements 	- Upon completing application process	n.a.	4 weeks (a maximum of 1 year if consent is given)
Personal details debtors and creditors	<ul style="list-style-type: none"> - Calculation income and expenses - Making payments or recovering debts - Contractual obligations - Disputes - Statutory or regulatory requirements 	- Transaction date	n.a..	2 years (or as required by law)
Details of service provides	<ul style="list-style-type: none"> - Payments - Contractual obligations - Recovery of debts - Internal review and security - Disputes - Statutory or regulatory requirements 	- End of contract or financial transaction	n.a.	2 years (or as required by law)
Details of members, insureds and third parties involved in insurance contracts with members or insureds.	<ul style="list-style-type: none"> - Contractual obligations - Disputes - Making payments or recovering debts - Requesting updates - Invitations for events and workshops - Statutory or regulatory requirements 	- End of contract	10 years	As required by law
Details of claimants or third parties involved in a claim	<ul style="list-style-type: none"> - Contractual obligations - Disputes - Making payments or recovering debts 	- Completion claims file	10 years	As required by law

	<ul style="list-style-type: none"> - Requesting updates - Statutory or regulatory requirements 			
Details contained in agreements	<ul style="list-style-type: none"> - Contractual obligations - Disputes - Making payments or recovering debts - Statutory or regulatory requirements 	- End of contract	10 years	As required by law
Details experts.	<ul style="list-style-type: none"> - Making payments - Disputes - Contractual obligations - Internal review and security - Statutory or regulatory requirements 	- End of contract	n.v.t.	2 years (or as required by law)
Special personal data	<ul style="list-style-type: none"> - Permission of persons involved - Statutory or regulatory requirements. - Insurance policies - Approval of medical treatment - Determination of disability compensation or death benefits - Medical assessments - Claims handling and disputes 	<ul style="list-style-type: none"> - Completion claimfile - End of employment agreement 	6 months	As required by law