

# The Offshore Pollution Liability Association Ltd

## OPOL

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### Privacy Notice

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**Issued 25 May 2018**

This privacy notice (the '**Notice**') is issued by The Offshore Pollution Liability Association Ltd ('**OPOL**') and its managers, Charles Taylor Insurance Services Limited (the '**Managers**'), as joint "Data Controllers" (as defined under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the '**GDPR**') as "the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data"). As joint controllers, OPOL and its Managers jointly determine the purposes and means of processing personal data.

#### **Personal Data Collected**

Pursuant to the GDPR, '**personal data**' means "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

We collect basic personal data submitted to us by parties to the OPOL Agreement (which agreement is available on our website following this [link](#)) (the '**Parties**') by persons wishing to become Parties or by representatives of such Parties or persons (including brokers acting on behalf of Parties or prospective Parties). We do also collect personal data of persons fulfilling the roles of or applying for the positions of Chairman, Managing Director or member of the Board of Directors of OPOL and of business contacts of OPOL. Most personal data is submitted to OPOL within the forms provided for on this website following this [link](#). Such personal data may include names and addresses, company name, email address and telephone number.

#### **Use and Retention of Personal Data**

Personal data collected by OPOL (or its Managers on OPOL's behalf) will be retained in a database (operated and managed by the Managers on behalf of OPOL) and used by OPOL's and its Managers for the purpose of fulfilling OPOL's obligations under the OPOL Agreement and/or where we have a legitimate interest for doing so, such as (i) providing and administrating OPOL's relationships with the Parties and prospective Parties; and (ii) meeting legal and other regulatory obligations by which OPOL and its Managers are bound.

We shall hold any personal data to enable us to comply with our contractual, legal or regulatory obligations and requirements.

We will not use personal data to undertake automated decision-making or profiling. Neither will we sell personal data.

### **Disclosure of Personal Data**

The Managers may share and/or disclose personal data internally within the Charles Taylor group of companies for the purposes of performing their obligations as Managers of OPOL but no personal data shall be shared and/or disclosed to any members of the Charles Taylor group of companies located outside the United Kingdom.

We may share and/or disclose personal data with third party suppliers or service providers such as lawyers and accountants, in order to conduct the legitimate business of OPOL. We shall not share personal data for any marketing purposes.

The Managers use third party data processors to host and support its IT system on which personal data is collected and processed by OPOL and the Managers. The Managers have implemented contractual safeguards with such third party data processors to adduce adequate safeguards for the personal data and ensure that they comply with the relevant data protection laws.

### **Storage and Security**

We are committed to protecting the confidentiality and security of personal data that is provided to us. We have implemented appropriate technical, physical and organisational security measures to protect against any unauthorised access to, damage, or disclosure or loss of, personal data we process and retain.

The OPOL website is hosted within a secure infrastructure to ensure additional protection is provided from unauthorised third party sources.

Please note, however, that we are not responsible for security issues arising out or of in connection with the equipment used to access the OPOL website and to provide personal data to OPOL and its Managers, or to circumstances which are out of our control (e.g. hacking, denial of service attacks or viruses).

### **Data Subjects' Rights**

Any person of whom we hold personal data has the following rights:

- Right to be informed. This notice and OPOL's privacy policies (which are referred to below) aim to provide the information required.
- Right of access to personal data.
- Right to have personal data rectified if it is inaccurate or out of date. The relevant contact details are below.
- Right to erasure. The relevant contact details are below.
- Right to restrict the way we process personal data.

- Right to data portability.
- Right to object to certain types of processing of personal data.
- Right to make a complaint with the Information Commissioner's Office.
- Right to claim compensation for damages caused by a breach of the GDPR.

For more information on OPOL's policies relating to data privacy, or to exercise any of these rights, please refer OPOL's privacy policies which you may find using the links below:

- [OPOL Data Privacy Policy](#).
- [OPOL Data Retention Policy](#).
- [OPOL Subject Rights Policy](#).
- [OPOL's Data Incident Management Plan](#).

### **Agreement to terms of Privacy Notice**

By using the OPOL website and/or providing information to us, you accept and agree to the collection and use of your personal data for the purposes described in this Privacy Notice and in OPOL's privacy policies.

### **Amendments and Contact Details**

We may amend this Privacy Notice from time to time by updating this page.

For any questions, concerns, or complaints relating to this Privacy Notice or our data privacy policies (and/or the implementation of such policies) or to make a subject access request, please contact us at:

By email: [admin@opol.co.uk](mailto:admin@opol.co.uk)

You may also lodge a complaint with the Information Commissioner's Office (ICO). <https://ico.org.uk/concerns> and the ICO Helpline (0303 123 1113).