

**Effective date:** 25 May 2018

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## **1 Introduction**

This notice describes how Lloyd's, as a data controller, collects, uses, shares and retains the personal information you provide and informs you about your choices regarding use, access and correction of your personal information. Lloyd's is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws.

For the purposes of this Privacy Notice, references to "we", "us" or "our" shall refer to Lloyd's.

## **2 Who we are**

The Society of Lloyd's (**Lloyd's**) is incorporated by Lloyd's Acts 1871 to 1982 whose principal place of business is at One Lime Street, EC3M 7HA.

## **3 What personal information we process about you**

### **Lloyd's Market Participants**

If you are Lloyd's member; director, partner, proprietor or senior employee of Lloyd's managing agent, coverholder or broker, we will collect your identity and contact details (e.g. name, work address, work email, telephone number, job title). We may also collect information about the nature of your professional experience and expertise (e.g. CV, biography). From certain individuals we may require a date of birth, nationality and proof of ID for identification and verification purposes. We will conduct further due diligence on certain individuals in compliance with regulatory requirements to prevent fraud and finances crimes.

If you register for any of our newsletters or attend any of our events we will collect your contact details and register your communication preferences.

### **Lloyd's Building Visitors**

For temporary passes we will request your name and personal ID to be presented at the reception. If you are an annual subscriber, non-insurance representative or another non-temporary passholder we will hold records of your name, data of birth, name of your employer and work email address. We will also ask whether you have been subject to any disciplinary proceedings or convicted of any unspent criminal offence. For non-temporary passes a photo will be taken and kept in our register.

### **Policyholders**

If you wish to verify your insurance policy, we will collect your identity and contact details (e.g. name, home address, email address, telephone number and your policy details (e.g. copy of insurance policy, policy number and policy period).

### **Complainants**

If you are making a complaint against your insurer we will collect your contact details together with information about the nature of your claim and any previous claims. If your complaint relates to your insurance policy we will need to check details of the policy. Depending on the nature of your

complaint, it may be necessary for us to collect and use your sensitive personal data, such as details of personal injury you may have suffered during an accident.

### **Users of Lloyd's tools and systems**

If you have registered to our Lloyds.com account and subscribed to any of our products, tools or systems we will collect your identity and contact details including name, work email address, job title, name of your employer and residency. If you are a devolved administrator, in addition to the above, we will keep audit records on completion of your additional responsibilities.

### **Lloyd's Community Programme Participants**

If you are a registered volunteer we will collect your work contact details and job title. For certain volunteering programmes, particularly these involving working with children, our associated charities would conduct further background checks on you. The results of your background checks would not be shared with Lloyd's and would be managed by particular associated charity only. If you are an application or a participant of any of our funds, grants or awards we will request your personal statement and CV together with your contact details.

### **General enquiries**

The personal information we hold is restricted to your name and contact details together with any additional personal details required to assist you with your enquiries.

## **4 Why we collect your personal information and the lawful basis for processing**

### **Lloyd's Market Participants**

Most of your personal information we receive at application stage of you wishing to become Lloyd's member or your employer wishing to become Lloyd's registered, broker, coverholder or managing agent. Some of the information you provide to us directly, some of the information we obtain via associated market participants. Your employer warrants to us that you have given all necessary permissions to your employer to provide this information to us.

We may also have a legal or regulatory obligation to use such information, for example, when conducting compliance due diligence, filing regulatory reporting or when relevant regulatory authorities wish us to maintain certain records of any dealings with you. In order to process any criminal conviction data we will request your explicit consent.

Under legitimate interest, Lloyd's will use the personal information for purposes of processing applications, keeping register of key staff, reporting, audit and future contact purposes.

It's also in Lloyd's legitimate interest to send you market and regulatory updates and promotional materials and to invite you to our events.

### **Lloyd's Building Visitors**

We will collect your personal information when you apply for a pass if you wish to be admitted to Lloyd's premises in order to conduct insurance business or provide services to Lloyd's. We will process your information for physical access control to the building and your identification and verification purposes. We use CCTV cameras throughout Lloyd's premises for security and safety purposes. It's in Lloyd's legitimate interest to restrict access to its premises and safeguard its property, visitors and employees. If you are an annual subscriber, Lloyd's will process your data in accordance with its legal obligations under the Annual Subscribers Byelaw. In order to process any criminal conviction data we will request your explicit consent.

### **Policyholders**

We will collect your personal information to independently verify your policy and confirm whether your policy is legitimate or fraudulent. In addition to information directly supplied by you, we will make additional enquiries to relevant brokers and underwriters to ensure that the risk covered is in fact insured in the Lloyd's market. It's in Lloyd's legitimate interest to process your personal information in order to provide you with the correct response. We may also be under certain regulatory obligations to report fraudulent activities to relevant regulatory authorities.

### **Complainants**

If you are a policyholder and you decide to raise a complaint with us, we will use your personal information to assess the merits of your complaint. Some of your information we will obtain directly from you, additional information we will request from the relevant underwriter of your policy. It's in Lloyd's legitimate interest to process your personal information to resolve disputes fairly and efficiently. We may also be under certain legal and regulatory obligations to establish frameworks processes and procedures to manage and report on the Lloyd's policyholder complaints requirements as defined by UK and international regulators. We may also be under legal obligation to share your data with relevant regulatory authorities or maintain your records of your complaint for a certain period of time.

### **Users of Lloyd's tools and systems**

We will collect your personal information when you register or you have been granted access to our tools and systems. Your employer warrants to us that you have given all necessary permissions to your employer to provide this information to us. It's in Lloyd's legitimate interest to process your personal information for appropriate administration and maintenance of the systems.

### **Lloyd's Community Programme Participants**

If you participate in any of our volunteering programmes or apply for any of our funds or grants we collect your personal information at application of registration stage and further process your data to successfully administer and deliver on our programmes. In certain circumstances, when we collaborate with number charities on delivery of volunteering programmes, we may share your data with them. It's in Lloyd's legitimate interest to process your personal information in relation to Lloyd's Community Programme's activities.

### **General enquiries**

Your personal details will be processed to allow Lloyd's to respond to your enquiry and for information on our communication history should you wish to contact us again. It's in Lloyd's legitimate interest to process your personal information to provide you with relevant information or advice.

## **5 Who we are sharing your data with**

For our general business administration, efficiency and accuracy purposes your personal information might be shared among certain Lloyd's offices (including overseas subsidiaries).

In order to properly manage the Lloyd's market and exercise certain supervisory powers we may share your personal information with the Lloyd's Market Participants. For example, to successfully

resolve any complaint we will require all relevant information about you to be provided by your insurer.

To help manage our business and deliver services we may share your personal information with third party service providers such as IT suppliers, document management providers and others. We require all our service providers to respect the confidentiality and security of personal data.

We may be under legal or regulatory obligations to share your personal data with courts, regulators and law enforcement bodies.

## **6 How long we keep your data**

We will retain your personal information for as long as is reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice. The retention period will primarily be determined by relevant legal and regulatory obligation and/or duration of our business relationship with you, your employer or another associated party. We maintain and update regularly our data retention policy with a detailed retention schedule. We will securely delete or erase your personal information if there is no valid business reason for retaining your data. In exceptional circumstances, we may retain your personal information for longer periods of time if we reasonably believe there is a prospect of litigation, in the event of any complaints or there is another valid business reason the data will be needed in the future.

## **7 International transfers**

From time to time we may need to share your personal information with Lloyd's subsidiaries that may be based outside of the European Union. We may also allow our service providers, who may be located outside the EU, access to your personal information. We may also make other disclosures of your personal information overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

- We will only transfer your personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.
- Transfers within Lloyd's overseas offices will be covered by standard contractual clauses, adopted by the European Commission which gives specific contractual protections designed to ensure that your personal information receives an adequate and consistent level of protection.
- Transfers to service providers and other third parties will always be protected by contractual commitments and where appropriate further assurances.
- Any requests for information we receive from law enforcement or regulators will be carefully checked before personal information is disclosed.

Information relating to the safeguards in place for all international transfers can be obtained by writing to the DPO, whose details can be found in section 9.

## **8 Your rights**

You have certain rights as an individual which you can exercise in relation to the information we hold about you. If you make a request to exercise any of your rights we reserve the right to ask you for a proof of your identity. We aim to acknowledge your request as soon as possible and will address your query within one month from your request.

You have the following rights:

### **The right to access**

You are entitled to a confirmation whether we are processing your data, a copy of your data, and information about purposes of processing, who do we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, where we got your data from and how you can make a complaint.

### **The right to rectification**

If you believe the personal information we hold about you is inaccurate or incomplete you can request for it to be rectified.

### **The right to erasure**

If you withdraw your consent, terminate a contract with us or you believe the personal information is no longer necessary for the purposes for which it was collected, you may request your data to be deleted. However, this will need to be balanced against other factors, for example there may be certain regulatory obligations which mean we cannot comply with your request.

### **The right to restriction of processing**

You can ask us to restrict (i.e. keep but not use) your personal data, but only where:

- Its accuracy is contested, to allow us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

### **The right to data portability**

If we collected your information under a contract or your consent, you can request from us to transfer your personal information to provide it to another third party of your choice.

### **The right to object**

You have the right to object at any time to processing of your personal data where processing is necessary for the performance of a task carried out in the public interest, or in the exercise of an official authority vested in the controller. You may also object where the processing is necessary for

the purposes of the legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms, in particular where you are a child.

### **The right to withdraw consent**

If we processed your personal information under your consent, you can withdraw it any time. We do not have to comply with a request where it would adversely affect the rights and freedoms of other individuals.

## **9 Contact details of the Data Protection Officer**

If you have any questions relating to data protection that you believe we will be able to answer, please contact our Data Protection Officer:

### **Data Protection Officer**

Lloyd's  
1 Lime Street  
EC3M 7HA, London

Email: [data.protection@lloyds.com](mailto:data.protection@lloyds.com)

## **10 Complaints**

If you are not satisfied with our response or believe we are not processing your personal data in accordance with legal requirements you can make a complaint to relevant Data Protection Authority. Our Lead Authority within the European Union is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>).