

## Privacy Notice: Delegated Authorities and Delegated Claim Administrators

**Effective date:** 09 June 2025

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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, why we collect it and the lawful basis for processing

System	Personal Data we process about you	Why we process it	Lawful basis for processing by Lloyd's
<b>Lloyd's Access Framework</b>	<ul style="list-style-type: none"><li>Identity and contact data: title, first name, last name, business email address, employer name, job title, country of residence, telephone number.</li><li>Profile data: username, password and user ID.</li><li>Usage data: includes information on which systems you use.</li></ul>	<ul style="list-style-type: none"><li>To allow access to Lloyd's systems.</li><li>To confirm individual belongs to the company access will be granted too.</li><li>To conduct user audits.</li></ul>	<ul style="list-style-type: none"><li>Legitimate interest</li></ul>

	<ul style="list-style-type: none"> <li>• Technical data: includes login data.</li> </ul>		
<b>ATLAS</b>	<ul style="list-style-type: none"> <li>• Identifying information (date of birth, nationality (if provided)).</li> <li>• Limited personal information which includes your name, email address nationality (if provided), date of birth and a CV.</li> <li>• Details about professional conduct.</li> </ul>	<ul style="list-style-type: none"> <li>• To process coverholder applications.</li> <li>• Communicating with coverholders to provide relevant information, including training, updated rules and information about Lloyd's activities.</li> <li>• To conduct obligatory oversight, supervision, reviews and ensure the compliance of coverholders. Activities Lloyd's may undertake include screening, background, compliance and regulatory checks.</li> <li>• Dealing with regulators and complying with legal obligations.</li> <li>• Developing, operating and maintaining systems at Lloyd's to support the carrying on of insurance business, including data reporting and coordinating audits.</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>
<b>Market Entity Database (MED)</b>	<ul style="list-style-type: none"> <li>• Identifying information (date of birth, nationality (if provided)).</li> <li>• Limited personal information which includes</li> </ul>	<ul style="list-style-type: none"> <li>• To process delegated claims administrator applications.</li> <li>• Communicating with</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>

	<p>your name, email address nationality (if provided), date of birth and a CV (if provided).</p> <ul style="list-style-type: none"> <li>Details about professional conduct.</li> </ul>	<p>delegated claims administrators to provide relevant information, including training, updated rules and information about Lloyd's activities.</p> <ul style="list-style-type: none"> <li>To conduct obligatory oversight, supervision, reviews and ensure the compliance of delegated claims administrators. Activities Lloyd's may undertake include screening, background, compliance and regulatory checks.</li> <li>Dealing with regulators and complying with legal obligations.</li> </ul>	
<b>Delegated Audit Manager (DAM)</b>	<ul style="list-style-type: none"> <li>Identifying information (Name).</li> <li>Contact information (email addresses).</li> </ul>	<ul style="list-style-type: none"> <li>Personal details will be processed to support the annual coverholder and DCA coordinated audit scheduling process.</li> <li>Providing Auditor information to Managing Agents for oversight and business purposes.</li> <li>To conduct obligatory oversight of Auditors. Activities Lloyd's may undertake include screening, background, compliance and regulatory checks.</li> <li>Providing Coverholders &amp; DCAs with audit recommendations.</li> <li>Communications sent to Auditors.</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligation</li> </ul>
<b>Delegated Contract Oversight Manager</b>	<ul style="list-style-type: none"> <li>Limited personal information which includes your name, email address.</li> </ul>	<ul style="list-style-type: none"> <li>To enable market participants to register binding authority</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligation</li> </ul>

(DCOM)		<p>contracts</p> <ul style="list-style-type: none"> <li>• Mandatory requirement all binding authorities are registered online in DCOM.</li> <li>• To conduct oversight.</li> <li>• Dealing with regulators and complying with legal obligations.</li> </ul>	
Identity	<ul style="list-style-type: none"> <li>• <b>Identity and contact data:</b> title, first name, last name, business email address, employer name, job title, country of residence, telephone number.</li> <li>• <b>Profile data:</b> username, password and user ID.</li> <li>• <b>Usage data:</b> includes information on which systems you use.</li> <li>• <b>Technical data:</b> includes login data.</li> </ul>	<ul style="list-style-type: none"> <li>• To allow access to Lloyd's systems.</li> <li>• To confirm individual belongs to the company access will be granted too.</li> <li>• To conduct user audits.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest</li> </ul>

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

Personal data collected and processed for the purposes of screening, conducting background, compliance and regulatory checks will be shared with Lloyd's employees on a restricted 'needs to know' basis, regulators and managing agents or brokers with whom you have or are proposing to have a relationship. Your data will not be shared outside of Lloyd's, except in limited circumstances with regulators, police, and other public authorities.

## **5 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.

## **6 International transfers**

From time to time, we may need to share your personal information with members of Lloyd's subsidiaries 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 and 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 the 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 outside the UK and EU will be supplemented with appropriate organisational and technical security measures in order to protect your personal data;
- Transfers to service providers and other third parties will always be protected by contractual commitments and where appropriate further assurances; and
- 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 Data Protection Officer, whose details can be found in section 9.

## **7 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 personal information under a contract or with 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.

## **8 Additional Privacy Notices**

We may undertake certain processing of your other personal data which is described in additional Privacy Notices, and these are available on [www.lloyds.com](http://www.lloyds.com) and also on the intranet.

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

If you have any questions relating to data protection, 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 is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>).