

Privacy Notice: Delegated Data Manager (DDM)

Effective date: December 2020

1 Introduction

This notice describes how Lloyd’s, in its capacity as a data controller, collects, uses, shares and retains the personal information you provide when you use Delegated Data Manager (DDM) 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.

About DDM: DDM is a system that allows one central place for submission, access and transformation to standardise data for Lloyd’s market globally. It allows you to submit to Lloyd’s risk premium and claims data to a “one stop shop”.

2 Who we are

The Society of Lloyd’s, incorporated by Lloyd’s Acts 1871 by the name of Lloyd’s, whose principal place of business is at One Lime Street, EC3M 7HA.

3 What personal information we process about you

Personal Data we process about you	Why we process it	Lawful basis for processing by Lloyd's
<p>Contact details (name, phone number, email address)</p>	<p>To allow Lloyd’s to discharge its regulatory and market supervisory functions. This may include but not be limited to ensuring Lloyd’s is able to:</p> <ol style="list-style-type: none"> 1. Prepare and carry out its annual published Market Oversight Plan 2. Discharge its regulatory and supervisory rights and obligations under the Lloyd’s Acts and byelaws 3. Take steps to protect the proper interests of customers (policyholders) 4. Take steps to protect Lloyd’s Central Fund; and 5. Meet any obligations it has to its own regulators. 	<p>For Lloyd's legitimate interests, and compliance with its legal and regulatory obligations</p>

4 Who we are sharing your data with

We will share personal data with Charles Taylor Incorporated who are our third-party service provider who provide the DDM system. We require all our service providers to respect the confidentiality and security of personal data. LIMOSS administer the contract for the supply of the DDM system, however they have no access to the personal data contained within it.

5 How long we keep your data

We retain your personal information for as long as is reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice.

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 or 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

We may make disclosures of your personal information overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body. In addition to this, Cognizant, CTI's support desk sub-processor in Manilla, Philippines may receive/access personal data (to include at least name and email address) as well as in India, in the course of providing support to CTI.

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 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 8.

7 Your rights

You have certain rights as an individual which you can exercise in relation to the data 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 data 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.

8 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

9 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/>).