

Privacy Notice: Applicants

Effective date: 25 October 2024

1 Introduction

This Privacy Notice applies to all job applicants, potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels (e.g. via professional recruiting firms). 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

"Personal data" means any information relating to you. Lloyd's may collect, process and use the following categories types of personal data (the "**Applicant Data**") about you:

- **Identification data**, such as your name, citizenship, passport data, photo, drivers' licence information, national insurance number, health insurance and governmental retirement plan information and tax reference;
- **Personal information**, such as your date and place of birth, emergency contact details, and gender;
- **Contact details**, such as your home address, telephone number and email address;
- **Education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience;
- **Other application data**, including social mobility data such as the information included in your application form/CV;
- **Information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies; audio and video recordings in support of the interview process;
- **Background check information**, such as information obtained through reference checks and confirmation about your work/educational background.

In addition to the collection, processing and use of the Applicant Data, Lloyd's collects, processes and uses the following special categories of personal information about you which we call "**Sensitive Applicant Data**":

- **Health and medical data**, including information on disability;
- **Criminal records data**, in the event that Lloyd's has conducted or received the results of criminal records background checks in relation to you, where relevant and appropriate to your role;
- **Race or ethnicity data**, such as information contained in your passport or other citizenship and right to work documentation, and information which you have voluntarily provided to Lloyd's;
- **Sexual orientation data**, where this has been provided voluntarily to Lloyd's.

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

We collect and use Applicant Data and Sensitive Applicant Data for a variety of reasons linked to processing your application for a role with us ("**Processing Purposes**"). However, we can only collect and use this data if we have a valid lawful basis for doing so, and we are required to explain the various lawful bases that we rely on to you.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we use your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Processing Purposes	Legal Bases
<p>1. Administering and processing your application (including processing a job offer should you be successful) including identification data, contact details, information about your qualifications and employment history, and information obtained during your interview and information contained in your CV.</p> <p>2. To determine your eligibility for the role you applied for, including identification data, video and audio recording (in support of the candidate interview process) contact details, information about your work and education experience, information obtained during your interview and information contained in your CV.</p> <p>3. Conducting background checks as part of your application, including identification data, contact details, information about your qualification and employment history.</p>	<p>Processing Purposes 1 to 3:</p> <ul style="list-style-type: none"> • Necessary for performing a contract with you as the data subject; • Compliance with legal obligations which Lloyd's is subject to in relation to employment law; • Legitimate interests of Lloyd's (see below); and • Your consent as data subject.
<p>4. Complying with applicable laws and employment-related requirements along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data and contact details.</p>	<p>Processing Purposes 4 to 5:</p> <ul style="list-style-type: none"> • Compliance with legal obligations which Lloyd's is subject to, particularly in relation to tax law, employment law, social security law and immigration law; and

5. **Monitoring and ensuring compliance with applicable policies and procedures and laws**, which involves the processing of your identification data and contact details, including the operation of a whistleblowing hotline
- Legitimate interests of Lloyd's (see below).

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6. **Communicating with you, Lloyd's employees and third parties, including informing you of future opportunities with Lloyd's** (such as existing or potential business partners, suppliers, customers, end-customers or government officials), including communicating future employment opportunities, which involves the processing of identification data and your contact details.
- Processing Purpose 6:
- Necessary for performing a contract with you as the data subject - we need to be able to communicate with you so that we needed to enter into a contract with you;
 - Compliance with legal obligation to which Lloyd's is subject; and
 - Legitimate interests of Lloyd's.

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7. **Responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of identification data and contact details.
- Processing Purpose 7:
- Compliance with legal obligations which Lloyd's is subject to.

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8. **Complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, information about the role you have applied for, including the role's salary and benefits.
- Processing Purpose 8:
- Legitimate interests of Lloyd's, i.e. we need to ensure that we manage our business effectively; and
 - Compliance with legal obligations which Lloyd's is subject to.

Below are the Processing Purposes and corresponding Legal Bases for **Sensitive Applicant Data**:

Processing Purpose	Legal Bases
1. To accommodate your application and interview and for compliance with legal obligations , we may use health and medical data.	<ul style="list-style-type: none"> • Your explicit consent as allowed by local data protection law; and • Necessary to carry out the obligations and to exercise specific rights of Lloyd's or you in the field of employment and social security and social protection law as permitted by local data protection law.

<p>2. Criminal records background checks in relation to you in the process of your application, where relevant and appropriate to the role you are applying for.</p>	<ul style="list-style-type: none"> • Your explicit consent as allowed by local data protection law; • Necessary to carry out the obligations and to exercise specific rights of Lloyd's or you in the field of employment and social security and social protection law as permitted by local data protection law; and • Necessary for reasons of substantial public interest as permitted by local data protection law.
<p>3. Equal opportunities monitoring and diversity monitoring and initiatives may involve us using race or ethnicity data such as information contained in your passport or other citizenship and right to work documentation, or sexual orientation data where this has been provided voluntarily to Lloyd's.</p>	<ul style="list-style-type: none"> • Necessary for reasons of substantial public interest as permitted by local data protection law; and • Your explicit consent as allowed by local data protection law.

When we rely on legitimate interests of Lloyd's or third parties as one of legal grounds to process your data, this may include:

- Assessing your suitability for employment/engagement with Lloyd's
- Implementation and operation of a group-wide organisational structure and group-wide information sharing
- Right to freedom of expression or information, including in the media and the arts
- Prevention of fraud, misuse of company IT systems, or money laundering
- Operation of a whistleblowing scheme
- Physical security, IT and network security
- Internal Investigations
- Compliance with our legal obligations
- Proposed mergers and acquisitions.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

5 Who we are sharing your data with

- **Lloyd's Overseas Offices.** As the Lloyd's entity that you are applying to is part of a wider group with offices located across the globe, which all partially share management, human resources, legal, compliance, finance and audit responsibility, Lloyd's may transfer the Applicant Data and Sensitive Applicant Data to, or otherwise allow access to such data by other entities within Lloyd's, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about the Lloyd's; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to

requests and legal demands from regulators and other authorities.

- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("Data Processors"). The Data Processors may carry out instructions related to recruitment, workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

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 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 a 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 reasons the data will be needed in the future. For further information, please refer to the Lloyd's Data Retention Policy or contact us as set out below to request further details on how long Lloyd's will retain different categories of personal information.

7 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 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.

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 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.

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, please contact our Data Protection Officer:

Data Protection Officer

Lloyd's
1 Lime Street
EC3M 7HA, London

Email: 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/>).