

# Privacy Notice: Lloyd's Digital Market

**Effective date:** September 2020

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## 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 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, 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
<b>Contact details</b> (corporate email, phone number, corporate association)	<ul style="list-style-type: none"> <li>To enable communications between you and other Market Users through the Digital Market</li> <li>To communicate provide relevant information about the availability of Digital Market services, security, network updates and information to assist your use of the services.</li> <li>To publish your profile to other users of the Market Directory</li> <li>To develop services and research</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest</li> <li>Consent</li> <li>Consent</li> </ul>
<b>Information about your professional life</b> (job title, corporate association,	<ul style="list-style-type: none"> <li>To publish your profile to other users of the Market Directory</li> </ul>	Consent

speciality, link to LinkedIn profile)	<ul style="list-style-type: none"> <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>	Consent
<b>Profile photo</b>	<ul style="list-style-type: none"> <li>To identify you to other users of the Market Directory</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest</li> </ul>
<b>Usage Data</b> (access logs, information exchanged through Twilio and Rocket.Chat which may contain personal data, Twilio chat logs timestamp audit log of when a voice/video call took place)	<ul style="list-style-type: none"> <li>To provide technical support</li> <li>We collect information about your use of messaging, specifically: when you send, receive, or engage with messages using Twilio and Rocket.Chat. Rocket.Chat message data is retained for 30 days for your access as a user. <b>Information exchanged through Rocket.Chat and Twilio is not accessible to Lloyd's.</b>To help us improve the functionality of Lloyd's Digital Market; tracking trends and other market analysis.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest</li> <li>Legitimate interest</li> <li>Legitimate interest</li> </ul>
<b>Calendar availability</b> (available / not available)	<ul style="list-style-type: none"> <li>To allow you to signal your availability to other users.</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>
<p><b>Cookies</b> (using Hotjar we collect the following information about your interaction with our site:</p> <ul style="list-style-type: none"> <li>the pages you visit</li> <li>how long you spend on each page</li> <li>how you got to the site</li> <li>what you click on while you are visiting the site</li> </ul>	<ul style="list-style-type: none"> <li>Heat maps and session recordings help Lloyd's understand how users interact with our site so we can improve user experience. The heat maps and session recording, in aggregate, can be viewed by Lloyd's, <b>but the information a user enters into the site is not visible or recorded..</b></li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>

<ul style="list-style-type: none"> <li>• whether you have participated in a poll</li> <li>• questions, queries or feedback you leave (including your name and email address if you choose to provide it)</li> <li>• how you interact with a page</li> <li>• your Internet Protocol (IP) address)</li> </ul>		
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**4 Who we are sharing your data with**

The business contact details you supply will be published in the Market Directory, which will be accessible to all Market Users.

We share personal data with Rocket.Chat, Twilio and Hotjar who are our third party suppliers. They may supply it to their sub-processors, who are at present (on behalf of RocketChat)

- ZOHO
- Amazon Web Services
- Stripe
- Apple push-notification service firebase

(on behalf of Twilio)

- SendGrid
- Authy App

Hotjar’s sub-processors are published [here](#).

Should these sub-processors change, we will let you know by amending this Privacy Notice.

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

**5 How long we keep your data**

Generally, we will 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 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.

### **Retention of profile data**

If you choose to close your entry in the Market Directory, your personal data will generally stop being visible to others via the Market Directory within one working day. We generally delete the account information within one day of account closure, except as noted below. We will retain anonymised information after your account has been closed.

If reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse (e.g., if we have restricted your account for breach of our Terms of Use), enforce our User Agreement, or fulfil your request to "unsubscribe" from further messages from us, we reserve the right to retain your personal data even after you have closed your account.

### **Retention of Rocket.Chat data**

Information you have shared with others (e.g., by using Rocket.Chat) may remain visible after you have closed your account or delete the information from your own profile or mailbox. Lloyd's does not control the data that other users have copied out of Lloyd's Digital Market.

## **6 International transfers**

We may allow selected 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 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 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 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](mailto: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. The Authority for the UK is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>).