

Privacy Notice: Lloyd's Systems (incl. Delegated Authority)

Effective date: 25 January 2019

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 information 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

For all Lloyd's Systems Access

The personal information we hold is restricted to your:

- **Identity and contact data:** title, first name, last name, business email address, employer name, job title, country of residence, telephone number
- **Profile data:** username, password and user ID
- **Usage data:** includes information on which systems you use
- **Technical data:** includes login data.

For Delegated Authorities only

Coverholder Applications

- **Coverholder employees** - the personal information we hold is restricted to your Bio/CV, date of birth and nationality (if provided), names and contact details where contracts between the parent entity and coverholders are signed.
- **Coverholder entity creation** - the personal information we hold is restricted to your name, nationality (if provided), date of birth and a CV.

Audit Coordination

- **Coverholders** - the personal information we hold is restricted to your CVs.

Key Staff changes at Coverholders

- **Coverholder employees** - the personal information we hold is restricted to your name, nationality (if provided), date of birth and a CV.

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

For all Lloyd's Systems Access

Your personal details will be processed in order to provide you access to the Lloyd's systems requested. The lawful basis which allows us to process your data is a legitimate interest.

It is in the legitimate interests of Lloyd's and its market participants that Lloyd's facilitates a Lloyds.com account which allows access to a number of products and tools. We process your personal information for appropriate administration and maintenance of the Lloyd's systems.

For Delegated Authorities only

Coverholder Applications - your personal details will be processed to ensure the status of approved coverholders is current. The lawful basis which allows us to process your data is legal obligation.

Audit Coordination - your personal details will be processed to support the annual coverholder audit. The lawful basis which allows us to process your data is legal obligation.

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

For all Lloyd's Systems Access

Your data will not be shared outside of Lloyd's.

For Delegated Authorities only

Your data will only be shared individuals within the market with whom you have a relationship and regulators.

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 reasons the data will be needed in the future.

7. **International transfers**

From time to time we may need to share your personal information with members of the Lloyd's subsidiaries who 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 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.

8. Your rights

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

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 information, 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 information 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 object

You have the right to object at any time to processing of your personal data where (i) we use data about you for marketing, or (ii) if we use the data about you on the basis of legitimate interest for purposes other than direct marketing.

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.

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 Supervisory Authority.

Our Lead Authority within the European Union is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>)