

## Privacy Notice: Complaints

**Effective date:** 1 December 2022

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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 where you have contacted us to submit a query, complaint or get in contact with us for any other reason. 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**

#### **Complaints**

The personal information we hold is restricted to your name, correspondence address, email address, contact number, case notes, bank details associated to the case, photos, expert reports, phone calls, representative details, and information regarding relevant legal cases.

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

Lloyd's collects your personal information to enable us to deal with the complaint or enquiry, and it is in its legitimate interest to process personal information for this purpose. In addition, Lloyd's is required to establish framework processes and procedures to manage and report on the Lloyd's policyholder complaints requirements as set out in UK and international regulations. The lawful basis for this process is a legal obligation in accordance with Financial Services regulations.

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

Your data will only be shared with UK FOS, US Department of Insurance and other international External Dispute Resolution Services, managing agents or their representatives to whom the complaint is pertinent.

### **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 reason the data will be needed in the future.

## **7 International transfers**

From time to time we may need to share your personal information with 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 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.

## **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 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.

## **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 Data Protection 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/>).