

Privacy Notice: Delegated Contract Manager Platform (DCM)

Effective date: 16 April 2021

1 Introduction

This notice describes how Lloyd's, in its capacity as a data controller, collects, uses, shares and retains the personal data provided when using DCM and informs you about your choices regarding use, access, rights and correction of your personal data. 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 DCM: DCM is a centralised platform provided by Lloyd's for market participants to register all binding authority contracts in accordance with the Intermediaries Byelaw, as may be amended, updated or replaced from time to time. DCM allows registered users to register and draft the binding authority contracts and communicate and collaborate with stakeholders.

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 data we process about you

| Personal data we process about you | Purposes why we process your personal data | Lawful basis for processing by Lloyd's |
|--|---|--|
| <p>Contact details (name, phone number, job title, business email address) of:</p> <p>(a) Individual users of DCM; and</p> <p>(b) Individuals named in binding authorities (e.g. those authorised to underwrite insurance under a binding authority, or signatories to such binding authorities).</p> | <p>To allow Lloyd's to run and manage DCM for the benefit of market participants and to discharge its regulatory and market supervisory functions. This includes but is not limited to:</p> <p>(a) onboarding users and account set-up for DCM;</p> <p>(b) ensuring Lloyd's registers all binding authorities and maintains a central register of all such binding authorities in accordance with Lloyd's regulations;</p> <p>(c) providing DCM to enable market participants to have the ability to communicate and create binding authorities and</p> | <p>Lloyd's legitimate interests for onboarding users, monitoring DCM, sending notifications and to de-identify personal data for onward use for analytics.</p> <p>Compliance with Lloyd's legal and regulatory obligations in relation to registration of binding authorities and maintaining a central register for all such binding authorities.</p> |

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| | <p>other ancillary market services, including monitoring the use of DCM, reporting and sending notifications; and</p> <p>(d) de-identifying personal data in order that the de-identified data can be used for statistical analytics.</p> | |
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4 Who we are sharing your data with

We will share personal data with those of our third-party service providers who provide DCM, however this is limited to the purposes we process your personal data set out above in paragraph 3. We require all our service providers to respect the confidentiality and security of personal data.

| Third party service provider | Service Provided | Relevant Locations / Transfers |
|---|---|--|
| Accenture (UK) Limited | Provision of DCM Platform, including integration of Pegasystems and Adobe technology. | UK |
| Accenture Solutions Private Limited (India) | Sub-processors of Accenture UK Limited | India |
| Pegasystems Ltd | DCM Platform | UK (primary and backup datacentre). Support provided from sub processors located in multiple locations globally, including the US. |
| Microsoft | Host documents created on /uploaded to DCM Platform | UK (primary and backup) Support provided from sub processors located in multiple locations globally. |
| Adobe | Provision & hosting of Document Generation and Signature software | UK hosted except for one component (PDF to Word) which is US hosted. Support provided from sub processors located in multiple locations globally. |
| Service Now UK Limited | Provision and hosting of service support portal (ticketing solution) | UK hosted with secondary backup in the EU. Support provided from sub processors located in multiple locations globally. |

5 How long we keep your data

We retain your personal data 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 data if there is no valid business or regulatory reason for retaining your data. In exceptional circumstances, we may retain your personal data 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, the Table in paragraph 4 above sets out the countries where your data may be processed.

We 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 and we will ensure that we have the lawful authority to disclose that data.

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 the relevant Data Protection Authority. Our Authority is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>).