

## Privacy Notice: Third Party Vendors

**Effective date:** 1 November 2021

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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. 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.**

The personal information we hold is restricted to individual company contacts (including directors and shareholders) and CVs. Occasionally, for payment purposes, bank details.

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

We process your personal information, as it is necessary for the performance of a contract, for the following reasons:-

- To manage, administer and improve our business and client and service provider engagements and relationships and for corporate marketing, business development and analysis purposes
- To monitor and analyse the use of our products and services for system administration, operation, testing and support purposes
- To manage our information technology and to ensure security of our systems.

We also process your personal information to comply with laws and regulations. We sometimes go beyond the strict requirements of the relevant law or regulation, but only as necessary to pursue our legal obligations in cooperating with our regulators and other authorities, complying with foreign laws, preventing or detecting financial and other crimes and regulatory breaches, and protecting our businesses and the integrity of the financial markets. This involves processing your personal information for the following reasons:

- To cooperate with, respond to requests from, and to report transactions and/or other activity to, government, tax or regulatory bodies, financial markets, brokers or other intermediaries, courts or other third parties
- To monitor and analyse the use of our products and services for risk assessment and control purposes (including detection, prevention and investigation of fraud)
- To record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and

potential and/or criminal activity. To the extent permitted by law, these recordings are our sole property.

In most cases we do not rely on consent as the legal basis for processing your personal information. If we do rely on your consent we will make this clear to you at the time we ask for your consent.

Where your business provides goods or services to Lloyd's, we may process personal information as part of the following Procurement processes:-

- Vendor/Supplier Selection
- Purchase Order Management
- Vendor/Supplier Performance Management
- Supplier risk screening

The lawful basis for processing your information is legitimate interest.

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

Your data will not be shared outside of Lloyd's, its subsidiaries and overseas branches.

## **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 subsidiaries and branches 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 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/>).