

# Applicant Privacy Notice: Lloyd's Insurance Company S.A.

## 1 Introduction

**This Privacy Notice applies to job applicants, potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels (e.g., via professional recruiting firms).**

This privacy notice describes how **Lloyd's Insurance Company S.A. Belgium (hereafter referred to as "Lloyd's Europe")** and it extends to those of its branch offices in the **European Union (EU), also including Lloyd's Insurance Company S.A UK Branch in United Kingdom**, as data a 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 Europe 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 Europe.

## 2 Who we are

Lloyd's Europe, the data controller, is **Lloyd's Insurance Company S.A.** (Lloyd's Europe) an insurance and reinsurance company authorized and regulated by the National Bank of Belgium (NBB) and regulated by the Financial Services and Markets Authority (FSMA), Rue du Congrès 12-14, 1000 Brussels, with registered number 3094. Its registered office is at Place du Champ de Mars 5, Bastion Tower, 14th floor, 1050 Brussels, Belgium. Its company/VAT number is BE 0682.594.839, RPR/RPM Brussels.

## 3 What personal information we process about you

"Personal data" means any information relating to you. Lloyd's Europe will collect, process and use the following categories and types of personal data about you ("**Applicant Data**"):

- **Identification data** includes your name, surnames, passport number, national ID, citizenship, date of birth, gender.
- **Contact details** include your home address, telephone number and email address.
- **Education and work experience** includes contact details for your current/last employer, information about your educational background, certifications, your work experience, and other experience.
- **Other application data in your application form/CV** may include photo, interests, membership.

- **Information collected as part of the interview process**, such as notes taken from your interview or information provided by recruitment agencies.
- **Background check information**, such as information obtained through reference checks and confirmation about your work/educational background.
- **Cookies**: We use cookies on our job page when you search for jobs. Cookies are small text files placed on your device. You can accept or decline cookies. For more information you can see our Cookie Policy on our website: [www.lloydseurope.com](http://www.lloydseurope.com).

In addition to the collection, processing and use of the Applicant Data, Lloyd's Europe may collect, process, and use the following special categories of personal data about you which we describe as "**Sensitive Applicant Data**":

- **Health and medical data** may include information on disability if and as far as permitted by applicable laws.
- **Criminal records data**, if Lloyd's Europe has conducted or received the results of criminal records background checks in relation to you, where relevant and appropriate to your role and only if and as far as permitted by applicable law.

**Lloyd's Insurance Company S.A UK Branch** also could collect, process, and use the following special categories of personal information about you which we describe as

- **Race or ethnicity data** such as information contained in your passport or other citizenship and right to work documentation or information collected for visa and immigration purposes, and information which you have voluntarily provided to Lloyd's Europe for the purposes of equal opportunities and diversity monitoring and initiatives.
- **Sexual orientation data** such as information contained in your marriage/civil partnership certificate. In addition, where this has been provided voluntarily to Lloyd's Europe for the purposes of equal opportunities and diversity monitoring and initiatives.

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

We collect and use Applicant Data and Sensitive Applicant Data for a variety of reasons linked to process your application for a role with us (the "**Processing Purposes**"). However, we can only collect and use this data if we have a valid legal basis for doing so, and We have to explain the various legal bases that we rely on to you.

Please note that we will use your personal data for the purposes of processing for which they were collected unless we consider that they are needed for another purpose which will always be compatible with the original purpose of processing and on a legal ground for further processing. For new purposes of processing your data, you will be informed in advance.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we use your information. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the following table:

Below are the Processing Purposes and corresponding Legal Bases for Sensitive Applicant Data:

Processing Purpose	Legal Basis
<p><b>1.Administering and processing your application,</b> this purpose includes conducting background checks and disability data management as part of your application and it determines your eligibility for the role. This purpose includes communicating with your future opportunities with Lloyd's</p> <p>-Disability data management.</p>	<ul style="list-style-type: none"> <li>• Necessary for carrying out an employment contract with you as the data subject.</li> <li>• Legitimate interests of Lloyd’s Europe (See below); and</li> <li>• Your consent as data subject.</li> </ul>
<p><b>2. Recruitment management: Fit and proper applicants.</b></p> <p>-Criminal records background checks, where relevant and appropriate. (Staff acquisition onboarding).</p> <p>-Race and ethnicity data (contained in your passport or other citizenship and right to work documentation) could be processed of employees in UK.</p> <p>-Sexual orientation data (contained in your marriage/civil partnership certificate) could be processed of employees in UK.</p>	<ul style="list-style-type: none"> <li>• Necessary to carry out the obligations and to exercise specific rights of Lloyd’s Europe or you in the field of employment and social security and social protection law as permitted by local data protection law.</li> <li>• Legitimate interests of Lloyd’s Europe (See below); and</li> <li>• Your consent as data subject</li> </ul>

We rely on legitimate interest of Lloyd's Europe as one of the legal grounds to process your data, this includes:

- Assessing your suitability for employment/engagement with Lloyd's
- Implementation and operation of a group-wide organizational structure and group-wide information sharing
- Effective business/organizational management and the structuring thereof
- Right to freedom of expression or information, including in the media and the arts
- Prevention of fraud, misuse of company IT systems, or money laundering
- Operation of a whistleblowing scheme
- Physical security, IT, and network security
- Internal Investigations
- The establishment of exercise of and/or defense of legal claims
- Compliance with company policies and procedures
- Proposed mergers and acquisitions.

When relying on the legitimate interest's basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

## 5 Who are we sharing your data with

- **Regulators, authorities, and other third parties.** As necessary for the processing purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard personal information, and to process the personal information only as instructed.
- **Lloyd's or any subsidiaries of Lloyd's.** To enable the better administration of Lloyd's market.

## 6 How long do we keep your data

We will retain your personal information for as long as is necessary to fulfil the relevant purposes set out in this Privacy Notice. The retention period will primarily be determined by relevant legal and regulatory obligations and/or duration of our business relationship with you. In general, the retention period for applicants' data will be a maximum of two years. We maintain and regularly update 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 specified in the retention period if you consent to future opportunities with Lloyd's.

## 7 International transfer of personal data

From time to time, we may need to share your personal information with Lloyd's Insurance Company S.A. UK Branch who are based outside of the European Economic Area (EEA). We may also allow our service providers, located outside the EEA, access to your personal information.

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 recognized as providing an adequate level of legal protection or where we can be satisfied with those alternative arrangements are in place to protect your privacy rights.
- 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 proof of your identity. We aim to acknowledge your request as soon as possible. You have the following rights:

### 8.1 The right to access

You are entitled to 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.

### 8.2 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.

### 8.3 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.

### 8.4 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.

### 8.5 The right to data portability

If we collected your information under a contract or your consent, you could request us to transfer your personal information to provide it to another third party of your choice.

### 8.6 The right to object

You have the right to object to processing of your personal data which is based on legitimate interest. We shall no longer process the personal data unless there are compelling legitimate grounds for the processing which override your interests, rights, and freedoms or which relate to the establishment, exercise, or defence of legal claims. You also have the right to object against processing of your personal data for direct marketing purposes.

### 8.7 The right to withdraw consent

If we processed your personal information with your consent, you could withdraw it any time.

We do not have to comply with a request where it would adversely affect the rights and freedoms of other individuals.

If you make a request to exercise any of your rights sending an email to [LloydsEurope.DataProtection@lloyds.com](mailto:LloydsEurope.DataProtection@lloyds.com), we may ask you for a proof of your identity. We aim

to acknowledge your request as soon as possible and usually we will be able address your query within one (1) month of your request. If we cannot answer to your request within one (1) month, in any case we will acknowledge receipt of your request within one (1) month.

## 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**

Lloyds Insurance Corporation S.A.  
Bastion Tower  
Place du Champ de Mars 5  
1050 Bruxelles  
Belgium  
Email : [LloydsEurope.DataProtection@lloyds.com](mailto:LloydsEurope.DataProtection@lloyds.com)

This privacy notice is also available in French, Spanish, Italian, German, Dutch, Swedish and Polish upon request. Please contact the data protection team for any requests [lloydseurope.dataprotection@lloyds.com](mailto:lloydseurope.dataprotection@lloyds.com)

## 10. Making a complaint to the relevant data protection Authority

If you are dissatisfied with how we process your personal data, you can make a complaint to a supervisory authority. The supervisory authority that supervises LIC is the Belgian Data Protection Authority (Autorité de protection des données/Gegevensbeschermingsautoriteit). Details of how to submit a complaint to it are on its website <https://www.dataprotectionauthority.be/>.

If you live in a European Economic Area (EEA) member state, you may complain to the supervisory authority in that country. You can find the contact details of your national supervisory authority on this website [https://edpb.europa.eu/aboutedpb/ board/members\\_en](https://edpb.europa.eu/aboutedpb/board/members_en).

If you live in United Kingdom, you may complain to the Information Commissioner's Office (ICO). You can find the contact details of the supervisory authority on this website [Home | ICO](#). For the Principality of Monaco, you may complain to the Commission of Control of Nominative Information (la Commission de Contrôle des Informations Nominatives). You can find the contact details of the supervisory authority on this website <https://www.ccin.mc/en/>.