

Lloyd's Canada, Privacy Procedures Statement

This statement details the policies and processes used by the Lloyd's Corporation and Lloyd's Canada, acting on behalf of Lloyd's Underwriters in Canada, for the protection and management of the data related to the Lloyd's business, policyholders, and claimants in Canada.

Data Governance Framework, Lloyd's Corporation

The Lloyd's Corporation Data Governance Framework is supported by a suite of policies and procedures, including:

- The Data Governance Framework procedure,
- Data Quality Management Policy,
- The Data Protection Policy,
- Data and Document Retention Policy,
- Information Security Policy,
- Acceptable Use Policy and,
- Other supporting procedures and standards.

Data Protection

The confidentiality, integrity, ethical and protection of all Lloyd's Data (both Personal Data and Commercial Data) is critical to the ongoing functioning and good governance of Lloyd's.

Lloyd's endeavours to meet the highest standards of data protection, security and governance of all data, both Commercial Data and Personal Data, in its processes. Everyone has a fundamental right to have their Personal Data protected. Lloyd's is committed to protecting the rights and privacy of individuals, as well as commercial concerns who are in the Lloyd's market or with whom Lloyd's deals.

Everyone processing Lloyd's Data (whether Commercial Data or Personal Data) must comply with the Data Protection Policy.

The Data Protection policy as well as the Data Protection procedures are applicable, implemented and observed in Canada.

Record Retention, Lloyd's Canada

Lloyd's Canada has established a country level records retention policy as a standalone procedure document.

Privacy Impact Assessments (PIA), Lloyd's Canada

Lloyd's Canada conducts PIAs on systems that are directly managed or administered by Lloyd's Canada or a third party contracted directly by Lloyd's Canada.

Canadian Data (the Personal Data and Commercial Data of Canadian policy holders, insureds or claimants) may be transferred to systems in the United Kingdom, Europe and the United States of America for policy, claim or payment processing, services and administration. In those

cases, the Lloyd's Corporation has implemented a protective process, PIAs and appropriate contractual requirements with third parties where applicable.

Collection

The Privacy Notice explains what personal information Lloyd's collects, uses and discloses about policyholders, beneficiaries, claimants and witnesses and for what purposes, in compliance with applicable Canadian privacy laws.

Consent

As detailed in the Privacy Notice, when an insured or claimant provides information to Lloyd's Canada, there is an implied consent to collect, use and disclose the information for those purposes describe in the Privacy Notice.

Use and disclosure

Lloyd's Canada will only use data for the purposes it was collected for or as described in the Privacy Notice. Lloyd's Canada does not disclosure information beyond those purposes, unless required by law. Lloyd's Canada does not solicit or market to policyholders or claimants.

Complaints, access requests and challenges

As noted in the Privacy Notice, all complaints, access requests and challenges of personal information held by Lloyd's Canada must be escalated to the Lloyd's Canada Privacy Officer immediately.

Contact for the Lloyd's Canada Privacy Officer is published on the Lloyd's Canada website, and in the Privacy Notice and is as follows:

Lloyd's Underwriters
Attention: Nicole Seymour, Privacy Officer:
Royal Bank Plaza South Tower, 200 Bay Street, Suite 2930,
P.O. Box 51 Toronto, Ontario M5J 2J2
Tel: 1-416-360-1512
E-mail: LloydsCanada@lloyds.com

Incident response, Lloyd's Canada

The Data and Privacy Incident Response procedure, is in place for Lloyd's Canada for data incident management and is applicable for all data collected by Lloyd's Canada or in the course of conducting the business of Lloyd's Underwriters in Canada.

Third Party Service Providers, Lloyd's Canada

Third party service providers are subject to Information Security Questionnaires and processes by the Lloyd's Procurement and Data Security teams at the time of onboarding and at contract renewals.