

**Effective date** 14 November 2018

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## **1 Introduction**

This Privacy Notice applies to all senior managers that perform control functions under Senior Insurance Managers Regime. This Privacy Notice describes how Lloyd's collects, uses, shares and retains the personal information you provide. It also informs you about your choices regarding use, access and correction of your personal information.

For the purposes of this Privacy Notice, references to "we", "us" or "our" shall refer to Lloyd's unless the context requires otherwise.

## **2 Who Lloyd's are**

Lloyd's are the Society of Lloyd's ("**Lloyd's**") incorporated by Lloyd's Act 1871 whose principal place of business is at One Lime Street, EC3M 7HA.

## **3 What personal information we process about you**

Your name, job title, contact details. In some cases, we will request for your CV and role profile.

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

We collect your personal information in order to review and approve your appointment or resignation from a senior position.

The lawful basis which allows us to process your data is legal obligation.

## **5 Who Lloyd's are sharing your data with**

Your data will only be shared individuals within the market with whom you have a relationship and regulators.

On a quarterly basis Lloyd's are required to provide an update on all individuals in senior positions within the Lloyd's market to the National Association of Insurance Commissioners in the United States (NAIC).

## **6 How long we keep your data**

Once the notification is received it is made available on request to relevant members of Team Lloyd's and your data is stored until the appointment is being formalised. At the end of every month the Governance and Solvency II team will review all held CVs and where an appointment has been finalised the CV will be deleted. Retention period of records of your appointment is determined by relevant regulatory obligation.

## **7 International transfers**

From time to time we may need to share your personal information with Lloyd's subsidiaries that 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.

On a quarterly basis Lloyd's are required to provide an update on all individuals in senior positions within the Lloyd's market to the National Association of Insurance Commissioners in the United States (NAIC). This is a feature of the Licencing agreement with the NAIC. The information supplied through the Governance Notifications is collated and supplied to them in a notarised document.

Information relating to the safeguards in place for all international transfers can be obtained by writing to the DPO, whose details can be found in section 9.

## **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:

### **The right to access**

You are entitled to confirmation as to 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.

## **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**

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