

Privacy Notice: Secretariat and Governance

Effective date 25th May 2018

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

Lloyd's Committees:

The personal information we hold is restricted to your name, correspondence address, email address, CV, copy of fit and proper check, bank account information declaration of interest, date of birth, National Insurance Number, passport details, parents names, name changes, criminal convictions and photographs. We also keep a note on those who have previously served on the Committees and a note of all applicants, including related paperwork.

Secretariat for the Lloyd's Enforcement Board:

For Enforcement Board & Panel, the personal information we hold includes CVs, personal contact details of the members (including a note of their assistants or other third parties who handle their diaries), declarations of interest and other information we may receive from such members from time to time. For example, if the individual is unable to make a meeting due to illness etc. We also hold all related paperwork relating to the appointments, including status, title, bank details, Date of Birth, National Insurance details and when such positions are due to be renewed. We also keep a note on those who have previously served on the Enforcement Board and Panel and a note of all applicants, including related paperwork.

Secretariat to the Lloyd's Members' Ombudsman:

The personal information we hold is restricted to your name, correspondence details, CV and any other related details including (but not limited to) information related to candidates put forward by the nominated members of the Council and the information obtained as a result of that process and its completion, in the appointment of the Ombudsman. For example, any fit and proper checks, bank account information declaration of interest, date of birth, National Insurance Number, passport

details, parent's names, name changes, criminal convictions and photographs. We may also keep a note on those who have previously served as Ombudsman.

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

Lloyd's Committees: We process your personal information in order to manage and administer Lloyd's Committees. This will include the management of appointments; resignations; arranging, holding and minuting meetings; fit and proper checks; and processing expenses and fees. The lawful basis for processing this information is legal obligation, consent and legitimate interests of members.

There is a legal obligation on Lloyd's to comply with FCA and PRA Senior Insurance Managers' Regime, to ensure the candidate is a fit and proper person to perform the function to which the application relates.

Consent is obtained from members who submit their data as part of application form to become a Controlled Function.

It's in members' legitimate interest to have their details entered onto the Committee Booklet and to be provided with a copy so they can be contacted/contact other members on committee matters.

Secretariat for the Lloyd's Enforcement Board:

We process your personal data to run and manage the Enforcement Board, to carry out enforcement proceedings and to hold Enforcement Tribunals. The lawful basis for processing this data is for a legal obligation and legitimate interests.

There is a legal obligation on Lloyd's to:

Appoint the members of the Enforcement Board, which shall exercise all disciplinary powers and functions conferred on the Council by the Lloyd's Acts 1871 to 1982 and any byelaw made pursuant to those Acts in relation to misconduct by any person subject to the enforcement jurisdiction of the Society.

It is in the legitimate interests of Lloyd's to make contact with relevant stakeholders in order to fulfil its legal obligations.

Secretariat to the Lloyd's Members' Ombudsman:

We process your personal data to appropriately and effectively handle any complaint from a member or a former member about:

- Regulated activities carried on by the Society;
- The Society's regulatory functions carried on by the Society, the Council or those to whom the Council delegates authority to carry out such functions;
- Advice given by an underwriting agent to a person to become, continue or cease to be, a member of a particular syndicate; or
- The management by a managing agent of the underwriting capacity of a syndicate on which the complainant participates or has participated

The lawful basis for processing this data is legal obligation. There is a legal obligation on Lloyd's to:

- Appoint an Ombudsman, who is under a duty to receive and investigate written complaints from individual members of the Society in relation to any action taken by or on behalf of the Society (which includes the Council, the Committee, their subcommittees and the Corporation).
- Establish and maintain appropriate and effective arrangements for handling any complaint from a member or a former member.

5 Who we are sharing your data with

Lloyd's Committees:

Your data will only be shared with Council, Board, and Committee / panel members, the FCA / PRA, Payroll and Auditors.

Secretariat for the Lloyd's Enforcement Board:

For Enforcement Board and Panel members, your data will be shared with the Enforcement Board and other personnel of Lloyd's for the purpose of running and managing the Enforcement Board/Enforcement tribunal. We may also be required by law and regulation to disclose such data. For panel members hearing a case; your CV's will be shared with the individual whose case is being heard. However selected personal information as determined by Lloyd's (e.g. your home address) is normally redacted, unless circumstances permit otherwise.

Secretariat to the Lloyd's Members' Ombudsman:

Your data will only be shared with the Council, Board and any other Committees as required from time to time. Your data will be shared with the Secretariat to the Lloyd's Members' Ombudsman and as required by law and regulation. Your data may be shared with other persons for the purpose of achieving the Lloyd's Members' Ombudsman objective.

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 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.

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 a proof of your identity. We aim to acknowledge your request as soon as possible and will address your query within one month.

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.

The right to withdraw consent

If you have given consent for us to process your data, you have the right to withdraw your consent at any time by contacting the DPO (see section 9)

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

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 within the European Union is the UK Information Commissioner's Office (<https://ico.org.uk/concerns/>).