

PCP and RD¹ Onboarding Privacy Notice: Lloyd's Insurance Company S.A.

1 Introduction

This Privacy Notice applies to PCPs and RDs, as part of the onboarding process.

This Privacy Notice describes how **Lloyd's Insurance Company S.A. including its branch offices in the European Union (EU)/European Economic Area (EEA), and in the United Kingdom (UK) (collectively referred to as "Lloyd's Europe")** 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), with registered number 3094 and regulated by the Financial Services and Markets Authority (FSMA). 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 ("**Onboarding Data**"):

- **Identification data** includes your name, surname, passport number, DBS check², PES check³, driving license, national ID, citizenship, date of birth.
- **Contact details** include your home address, professional telephone number and professional email address.
- **Education and work experience**, information about your educational background, certifications, your work experience, and other experience.

¹ People in Contact with the Public and Responsible for Distribution.

² Criminal records check

³ Political affiliation check

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

We collect and use Onboarding Data for a variety of reasons linked to process your onboarding as PCP or RD 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 legal grounds for further processing. 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 rely 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 Onboarding Data:

Processing Purpose	Legal Basis
1.Administering and processing your candidature, this purpose includes conducting background checks as part of your candidature, and it determines your eligibility for the role.	<ul style="list-style-type: none">• Your consent as data subject.
2. Fit and proper secondees. -Criminal records background checks, where relevant and appropriate. - Political affiliations checks	<ul style="list-style-type: none">• 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.

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 engagement with Lloyd's Europe

- 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 we share 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, 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 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.
- To enable adequate administration of the Lloyd's market.

6 How long we keep your data

We will retain your personal information no longer than 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 transfers

From time to time, we may need to share your personal information from LIC UK Branch with Lloyd's Europe in the EEA and at the same time we may need to share your personal information from Lloyd's Europe in the EEA to LIC UK Branch based in the UK. We may also allow our service providers (as Data processors), located in the UK, 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 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.

If you need more information, we remind you that you have the right to be informed which can be exercised at lloydseurope.dataprotection@lloyds.com

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 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

You have the right to obtain erasure of your personal data without undue delay when the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw your consent on which the processing is based and there is no other legal ground for the processing; you object to the processing pursuant and there are no overriding legitimate grounds for the processing, or you object to the processing for direct marketing purposes; your personal data has been unlawfully processed; your personal data has to be erased to comply with a legal obligation in Union or Member State law to which the controller is subject.

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 another third party or to you 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 may withdraw it at any time. Your right to revoke your consent is only applicable when the processing of your data is based on consent. When the processing is based on it being necessary to perform a contract or to meet a legal requirement this right of withdrawal does not apply.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. If you make a request to exercise any of your rights by sending an email to, LloydsEurope.DataProtection@lloyds.com, we may ask you for 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

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 the 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/>.

By signing this document, you consent to and acknowledge that you have been informed of the processing of your personal data.

Name and Surname.....

Date.....

Signature.....