

Privacy Policy: Lloyd's Insurance Company S.A.

1 Introduction

This privacy notice describes how Lloyd's Insurance Company S.A. (**LIC**), as a data controller, collects, uses, shares and retains your personal data. LIC is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws.

This privacy notice also informs you about your rights in respect of your personal data.

2 Who we are

LIC, the data controller, is an insurance company authorised and regulated by the National Bank of Belgium (**NBB**) 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 Ixelles, Belgium. Its company/VAT number is BE 0682.594.839, RPR/RPM Brussels. LIC is a wholly owned subsidiary of the Society of Lloyd's, 1 Lime Street, London, EC3M 3HA, United Kingdom (**Society of Lloyd's**).

This privacy notice applies to all the activities of LIC including those of its branch offices in the European Union (**EU**) and European Economic Area (**EEA**) and the UK.

3 How we collect personal data about you

3.1 Policyholders, claimants and beneficiaries

Personal data about policyholders, claimants and beneficiaries is collected from managing agents, Lloyd's brokers, coverholders and delegated claims administrators (**DCAs**). These are third parties that are outsourced service providers to LIC or that handle claims and/or complaints on our behalf. Personal data is collected via third party data processing service providers.

3.2 Complainants and their representatives

Personal data is collected from complainants when they advise us that they wish to make a complaint about a policy insured by us. In order for us to deal with a complaint, we may also obtain data from Lloyd's managing agents, Lloyd's brokers, coverholders and DCAs.

3.3 General enquirers

Personal data is collected from people that contact us about a general enquiry.

3.4 Office visitors

Personal data is collected from people that wish to visit any of our offices.

3.5 Lloyd's managing agents, Lloyd's brokers, coverholders, DCAs

Personal data about staff of Lloyd's managing agents, Lloyd's brokers, coverholders and DCAs is collected from the persons themselves, their firm or the Society of Lloyd's.

3.6 Other insurance market participants

Personal data about individuals who work for other insurance market participants is collected from the individuals themselves.

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4 What personal data we process about you

4.1 Policyholders, claimants and beneficiaries

We process data about: your identity and contact details (e.g. first name, last name, home address, email address, telephone number, social security/national identity number); your policy details (e.g. copy of insurance policy, policy number, policy period, premium, nature of policy cover); your claim details (e.g., date of loss, circumstances of the loss event, estimated and/or paid value of the claim). We also process sensitive ("special category") personal data such as medical or health data, depending on the nature and type of policy or claim.

4.2 Complainants and their representatives

We process data about: your identity and contact details (e.g. first name, last name, home address, email address, telephone number); your complaint details (e.g., circumstances of the complaint and your preferred means of resolving the situation). We also process special category personal data such as medical or health data, depending on the nature of your complaint. The provision of this personal data by complainants is not a contractual / statutory obligation. If you fail to provide this data, then we will be unable to deal with your complaint.

4.3 General enquirers

We process data relating to your identity and contact details (e.g., first name, last name, email address, telephone number) together with the name of your firm and any additional personal details required to assist you with your enquiry. The provision of this personal data is not a contractual / statutory obligation. If you fail to provide this data, then we will be unable to deal with your enquiry.

4.4 Office visitors

We process data relating to your identity and contact details (e.g., first name, last name, email address) together with the name of your firm and, when applicable, your vehicle details including registration number, when you visit any of LIC's offices. The provision of this personal data is not a contractual / statutory obligation. If you fail to provide this data, then we will be unable to allow you access to our offices.

4.5 Lloyd's managing agents, Lloyd's brokers, coverholders, DCAs

We process personal data about the staff of Lloyd's managing agents, Lloyd's brokers, coverholders, DCAs, e.g., first name, last name, job title, name of firm, business address, e-mail address, telephone number. The provision of this personal data is a contractual obligation in relation to the performance of the contracts that LIC has with such firms (See Section 5). If you fail to provide this data, then we may be unable to deal with such firms.

4.6 Other insurance market participants

We process personal data about individuals who work for other insurance market participants, e.g., first name, last name, job title, name of firm, business address, e-mail address, telephone number. In respect of events, we also process information regarding dietary requirements. The provision of this personal data is not a contractual / statutory obligation. If you fail to provide this data in relation to an event organised by LIC you will be unable to attend the event.

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5 Why we collect your personal data and the lawful basis for processing

5.1 Lawful bases

Under data protection regulations, LIC can only collect, process or share your personal data if we have a lawful basis to do so. The lawful bases that apply are:

- When you have given us your explicit consent. The main occasions on which we will request your consent are:
 - When we need to collect or use a type of personal data that is in a special category under data protection regulations. This includes data about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership and health data.
 - When we offer to send you information about our marketing activities.
- To fulfil our contractual and legal obligations under a contract where you are the policyholder or you are an insured person under a group insurance contract.
- To comply with a legal or regulatory obligation that we have. For example, to keep and store accurate records for a minimum period of time.
- When it is in our legitimate interest to do so. A legitimate interest is when we have a business or commercial reason of our own to use your personal data, but this reason must not unfairly prejudice your (privacy) rights and interests. For example, we rely upon our legitimate interests when processing your personal data to investigate and prevent fraud and other financial crimes. We also have a legitimate interest to organise and manage our business properly and to protect our premises and staff.

5.2 Policyholders, claimants and beneficiaries

We will process data about your policy and claim as this is necessary for managing our own business operations, e.g., producing our own management data, maintaining accounting and financial records, analysis of financial results. The lawful bases for this processing are that:

- It is necessary to fulfil our contractual and legal obligations under a contract;
- We have a legitimate interest to manage our business performance based on aggregated data; and,
- We have regulatory obligations to maintain appropriate and accurate records of our business activities.

5.3 Complainants and their representatives

We process data about your complaint as this necessary for us to handle your complaint effectively and to ensure that all complaints are handled efficiently and fairly. The lawful basis for this processing is (i) that we have a legitimate business interest to resolve complaints and/or (ii) that we have regulatory obligations to resolve complaints.

5.4 General enquirers

We process your personal details to enable us to respond to your enquiry and to identify our communication history should you wish to contact us again. The lawful basis for this processing is that either you have given us your consent or we have a legitimate interest to provide you with relevant information or guidance related to your enquiry and to provide enquirers with an efficient service.

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5.5 Office visitors

We process your personal, employer and vehicle details for physical access control to our offices, for identification verification purposes and for health and safety purposes. The lawful basis for this processing is that we have a legitimate interest to restrict access to our premises, and to safeguard the health and safety of our property, assets, visitors and employees.

5.6 Lloyd's managing agents, Lloyd's brokers, coverholders, DCAs

We process your personal data so that we can provide you with the following:

- Business communications relating to the activities that your firm performs on behalf of LIC or the business that your firm places with us. The lawful basis for this processing is that this processing is necessary for the performance of the agreement between LIC and your firm;
- Regulatory communications relating to regulatory and compliance obligations that apply to the (re)insurance business underwritten on behalf of LIC. The lawful basis for this processing is that we have a legal obligation to ensure that all our (re)insurance business is distributed, underwritten and serviced in compliance with the applicable laws and regulations;
- Marketing communications relating to our marketing activities. The lawful basis for this processing is that you have given us your consent; and,
- Event communications relating to events organised by LIC for which you have accepted an invitation. Your personal details will be processed to support the communication and management of the event. The lawful basis for this processing is that you have given us your consent.

5.7 Other insurance market participants

We process your personal data so that we can provide you with the following:

- Marketing communications relating to our marketing activities. The lawful basis for this processing is that you have given us your consent; and,
- Event communications relating to events organised by LIC for which you have accepted an invitation. Your personal details will be processed to support the communication and management of the event. The lawful basis for this processing is that you have given us your consent.

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6 Who we will share your data with

6.1 General arrangements

For our general business as an insurance company, to ensure administrative efficiency your personal data may be shared internally with the Society of Lloyd's or other subsidiary companies of the Society of Lloyd's. We may also share your personal data with courts, regulators or law enforcement agencies where this is necessary for the prevention or detection of crime and in order to fulfil legal or regulatory obligations in this regard. In certain cases, as outlined below, your personal data will also be shared with other external organisations. We require all our third-party service providers to maintain the confidentiality and security of all personal data entrusted to them.

We will never sell or rent out your personal details to any third-party organisation for any marketing purposes whatsoever.

6.2 Policyholders, claimants and beneficiaries

We will share your personal data with our third-party service providers such as business processing organisations, IT suppliers, actuaries, lawyers, business consultants, tax advisers, auditors and reinsurers. This processing activity is justified by our legitimate interest because it is necessary for the management and continuity of our business activities. The personal data will also be used to fulfil our reporting obligations to regulators, tax authorities or data protection authorities in order to fulfil legal or regulatory obligations in this regard. In addition, we will share your data with a Lloyd's managing agent, Lloyd's broker, coverholder or DCA that is dealing with your policy or claim on our behalf. This processing activity is necessary for the performance of the contract between us and a policyholder.

6.3 Complainants and their representatives

We will use your personal data to fulfil our reporting obligations to regulators, ombudsmen and other external dispute resolution services in order to fulfil legal or regulatory obligations in this regard. In addition, we will share your data with a Lloyd's managing agent, Lloyd's broker, coverholder or DCA that is involved in dealing with your complaint. The lawful basis for this processing is that the processing of this data is necessary for the performance of the agreement.

6.4 General enquirers

Your personal data will not be shared with an external organisation.

6.5 Office visitors

Your personal data may be shared with third party providers of building management services at our premises. The lawful basis for this processing is that we have a legitimate interest to restrict access to our premises, and to safeguard the health and safety of our property, assets, visitors and employees.

6.6 Lloyd's managing agents, Lloyd's brokers, coverholders, DCAs

Your business details, which may include incidental personal data such as contact details, may be shared with policyholders and others in the course of LIC carrying out its insurance business. In addition, personal data may be shared with regulators in order to fulfil legal or regulatory obligations in this regard.

6.7 Other insurance market participants

Your personal data will be shared with third party service providers that are supporting our organisation of an event such as IT software suppliers, event organisers and sponsors. The lawful basis for this processing is that this processing is necessary for the performance of our contract with the third party.

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7 How long we keep your data

LIC will retain your personal data for as long as is reasonably necessary to fulfil the relevant purposes for which we collected it as set out in this privacy notice and to comply with applicable law.

The retention period will primarily be determined by relevant legal and regulatory obligations and/or the duration of our business relationship with you, your employer or another associated party.

We maintain a Data Retention Schedule which lists the time period for which we can keep personal data that has been collected and processed for different purposes.

We will securely delete or erase your personal data if the legal ground applicable for processing does not apply anymore to your personal data. For example, our legitimate interest to keep your personal data has ceased to exist or your consent is no longer valid. In exceptional circumstances, we may retain your personal data for longer periods of time if we reasonably believe there is a prospect of litigation arising from a claim or complaint, or there is another legal ground for processing that is compatible with the original legal ground for processing that justifies that the data will be needed in the future.

Further data about the period of time for which we retain your personal data can be obtained from the LIC Data Protection Officer whose contact details are in Section 10 below.

8 Transfers of personal data outside the European Union

Occasionally we may need to share your personal data with organisations that are located outside the European Union (EU), e.g., to the Society of Lloyd's, or a Lloyd's managing agent. We may also need to share your personal data with organisations that may be located in the EU or outside it, e.g., other subsidiary companies of the Society of Lloyd's, a Lloyd's broker, coverholder, DCA or third-party service provider. In addition, we may be required to share your personal data with a regulator, tax authority, data protection authority, court or law enforcement agency outside the EU in response to a request from them. The legal grounds for these processing activities are set out in Section 6.1 above.

We will always take steps to ensure that any transfer of personal data to a country outside the EU is carefully managed to protect your data protection rights:

- We will only transfer your personal data 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 to the Society of Lloyd's or another subsidiary of the Society of Lloyd's will be covered by standard contractual clauses, adopted by the European Commission, which gives specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection.
- Transfers to Lloyd's managing agents, Lloyd's brokers, coverholders, DCAs or third-party service providers will always be protected by contractual commitments, and where appropriate further assurances.
- Where we are obliged to disclose personal data, any requests we receive from regulators, tax authorities, data protection authorities, courts or law enforcement agencies will be carefully checked before any personal data is disclosed.

Further information relating to the safeguards in place for transfers outside the EU can be obtained by writing to the LIC Data Protection Officer whose contact details are in Section 10 below.

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9 Your rights

You have certain rights as an individual, which you can exercise in relation to the personal data we hold about you. If you make a request to exercise any of your rights, 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.

You have the following rights. Subject to certain restrictions in data protection laws, you can exercise these rights in relation to your personal data that is processed by LIC:

- Your right of access - You have the right to ask us if we process your personal data and you can ask us for copies of your personal data.
- Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal data in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- If you gave your consent to processing your personal data, your right to withdraw that consent.
- Your right not to be subject a decision based solely automated individual decision-making, including profiling. LIC does not do this.

Data protection regulation allows for some rights to be limited in certain circumstances.

10 Contact details of the LIC Data Protection Officer

If you have any questions relating to data protection, or you wish to exercise any of your rights listed in Section 9 above, please contact the LIC Data Protection Officer by using the contact details below:

Data Protection Officer
Lloyd's Insurance Company
Place du Champ de Mars 5,
1050 Bruxelles, Belgium
LloydsEurope.DataProtection@lloyds.com

Lloyd's Insurance Company S.A. (UK Branch)
1 Lime Street, London,
EC3M 3HA, United Kingdom
LloydsEurope.DataProtection@lloyds.com

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11 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/about-edpb/board/members_en.

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/>.

If you live in the UK you can make a complaint to the Information Commissioner's Office. Details of how to do this are on its website <https://ico.org.uk/make-a-complaint/>.