

Privacy Notice: Non-Employee Worker

Effective date: 25 May 2018

1 Introduction

This Privacy Notice applies to all non-employee workers that directly or indirectly provide services to Lloyd's. 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

"Personal data" means any information relating to you. Lloyd's will collect, process and use the following categories and types of personal data about you ("**Non-Employee Worker Data**"):

- **Identification data**, such as your name, signature, employee/Staff ID, your photo, payroll ID, business email address, business address, business landline, citizenship, passport/ID data, drivers' licence information and national insurance number
- **Personal information**, such as your date and place of birth, emergency contact details, next of kin details, gender, details of family members
- **Contact details**, such as your home address, telephone number and email address
- **Information about the services you provide and how you are paid for them**, such as the start and end date of the contract under which you provide services to us, the number of hours that you provide services for, education history and qualifications, information about the pay you receive, such as your hourly rate of pay, tax reference for invoicing, your/your personal services company's bank account details and payment dates, and accrued pay information
- **Time, and systems / buildings access monitoring information**, such as CCTV images, swipe card access, time recording software, internet, email and telephone usage data
- **Performance information**, such as service provision reviews and the handling of any complaints in relation to the services you provide
- **Absence information**, such as dates of leave of absence/vacation, medical leave
- **Organisational data** including IDs for IT systems, company details, cost centre allocations, and organisations.

In addition to the collection, processing and use of the Non-Employee Worker Data, Lloyd's collects, processes and uses the following special categories of personal information about you which we describe as "**Sensitive Non-Employee Worker Data**":

- **Criminal records** (e.g. results of criminal records background checks)
- **Race and ethnicity data** (e.g. information contained in your passport or other citizenship and right to work documentation). This may also include information which you have voluntarily provided to Lloyd's for the purposes of our equal opportunities and diversity monitoring and initiatives
- **Sexual orientation data** (e.g. marital status and information contained in your marriage/civil partnership certificate for the purpose of administering name changes); where this has been has been provided voluntarily to Lloyd's 's according to the Equal Employment Opportunity Policy for the purposes of our equal opportunities and diversity monitoring and initiatives
- **Health data and medical data** (e.g. number of sick days, medical certificates, work related accidents for purposes of insurance compensation, information on disability, maternity leave).

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

We collect and use Non-Employee Worker Data and Sensitive Non-Employee Worker Data for a variety of reasons linked to processing your application for a role 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 are required to explain the various legal bases that we rely on to you.

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 are relying on to process your personal data where more than one ground has been set out in the table below.

Processing Purposes	Legal Bases
<p>1. Administering and providing pay for services, including payroll, contact details, information about the services you provide, your rate of pay and the number of hours you have worked, and details of your bank account/your personal service company's or other intermediary's bank account.</p>	<ul style="list-style-type: none"> • Necessary for performing a contract with you or with relevant intermediaries; • Compliance with legal obligations which Lloyd's is subject to in relation to employment law and tax law; and • Legitimate interests of Lloyd's (see below).
<p>2. administering our workforce and the services you provide; including tracking internet, email and telephone usage, conducting reviews of the services provided and handling any complaints in relation to the services you provide, and administering ethics and compliance training which involve the processing of identification data, contact details, information about the services you provide, your hourly rate of pay ;</p>	<ul style="list-style-type: none"> • Legitimate interests of Lloyd's (see below); • Compliance with legal obligations which Lloyd's is subject to; and • Necessary for performing a contract with you or with relevant intermediaries;

absence information and organisational data;

3. **providing IT systems and support** to enable you and others to perform their work, to enable our business to operate, and to enable us to identify and resolve issues in our IT systems, and to keep our systems secure which involves processing almost all categories of Non-Employee Worker Data;
- Necessary for performing a contract with you or with relevant intermediaries;
 - Legitimate interests of Lloyd's (see below).; and
 - Compliance with legal obligations which Lloyd's is subject to in relation to data protection law.
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4. **complying with applicable laws** along with the administration of those requirements, including tax laws which involves the processing of identification data;
5. **monitoring and ensuring compliance with applicable policies and procedures and laws**, including conducting internal investigations, which involves the processing of identification data, contact details, information about the services you provide, and your rate of pay;
- Compliance with legal obligations which Lloyd's is subject to, particularly in relation to tax law, employment law, social security law and immigration law; and
 - Legitimate interests of Lloyd's (see below).
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6. **Communicating with you, Lloyd's employees and third parties, including informing you of future opportunities with Lloyd's** (such as existing or potential business partners, suppliers, customers, end-customers or government officials), including communicating future employment opportunities, which involves the processing of identification data and your contact details.
- Necessary for performing a contract with you or with relevant intermediaries.- we need to be able to communicate with you; and
 - Compliance with legal obligation to which data controller is subject.
 - Legitimate interests of Lloyd's (see below).
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7. **communicating with your designated contacts in the case of an emergency** which involves the processing of contact details, information about the services you provide, and organisational data;
- Necessary to protect your vital interests as data subject
 - Legitimate interests of Lloyd's (see below).
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8. **Responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of identification data and contact details.
- Compliance with legal obligations which Lloyd's is subject to; and
 - Legitimate interests of Lloyd's (see below).
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9. **Complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the
- Compliance with legal obligations which Lloyd's is subject to; and
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processing of identification data, contact details, information about the services you provide, your rate of pay, and organisational data;.

- Legitimate interests of Lloyd's (see below).

Below are the Processing Purposes and corresponding Legal Bases for **Sensitive Non-Employee Worker Data**:

Processing Purpose	Legal Bases
1. Insurance compensation, workplace safety, compliance with legal obligations (such as reporting obligations) and providing an accommodating workplace may require health and medical data such as information on work-related accidents and information on disability.	<ul style="list-style-type: none">• Necessary to carry out the obligations and to exercise specific rights of Lloyd's or you in the field of employment and social security and social protection law as permitted by local data protection law.
2. Criminal Records background checks in relation to you in the process of your application, where relevant and appropriate to the role you are applying for.	<ul style="list-style-type: none">• Your explicit consent as allowed by legal data protection law'• Necessary to carry out the obligations and to exercise specific rights of Lloyd's or you in the field of employment and social security and social protection law as permitted by local data protection law; and• Necessary for reasons for substantial public interest as permitted by local data protection law.
3. Equal opportunities monitoring and diversity monitoring and initiatives may involve us using race or ethnicity data such as information contained in your passport or other citizenship and right to work documentation, or sexual orientation data where this has been provided voluntarily to Lloyd's.	<ul style="list-style-type: none">• Necessary for response of substantial public interest as permitted by local data protection law.

When we rely on legitimate interest of Lloyd's as one of legal grounds to process your data, this may include:

- Management of employment relations including performance, disciplinary and grievance issues
- Assessing your suitability for other roles within Lloyd's
- Allocating resource and monitoring workload
- Protecting your health and safety in the workplace
- Implementation and operation of a group-wide organisational structure and group-wide information sharing
- Right to freedom of expression or information, including in the media and the arts

- Customer Relationship Management and other forms of marketing
- Prevention of fraud, misuse of company IT systems, or money laundering
- Operation of a whistleblowing scheme
- Physical security, IT and network security
- Internal Investigations
- Proposed mergers and acquisitions.

When relying on the legitimate interests 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 are sharing your data with

- **Within Lloyd's Overseas Offices.** As the Lloyd's entity that you provide services to is part of a wider group, with offices located across the globe, which all partially share management, human resources, legal, compliance, finance and audit responsibility, Lloyd's may transfer the Non-Employee Worker Data and Sensitive Non-Employee Worker Data to, or otherwise allow access to such data by other entities within Lloyd's overseas offices, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about Lloyd's; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Communication with third parties.** As necessary in connection with business operations, work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers, end-customers or government officials and other third parties.
- **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, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Acquiring entities.** If the Lloyd's business for which you work may be sold or transferred in whole or in part (or such a sale or transfer is being contemplated), your personal data may be transferred to the purchaser or potential new purchaser as part of the transfer itself or as part of an initial review for such transfer (i.e. due diligence), subject to any rights provided by applicable law, including jurisdictions where the purchaser or potential purchaser are located.
- **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 workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be

subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Lloyd's entities and third parties that we may share your data with, please contact the DPO, whose details can be found in section 9 below.

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. 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.

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 we processed your personal information under your consent, you can withdraw it any time. We do not have to comply with a request where it would adversely affect the rights and freedoms of other individuals.

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/>).