



DATA PRIVACY NOTICE

Introduction

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

Lloyd & Co Employee Benefits Ltd wholly owns subsidiary Lloyd & Co Employee Benefits Holdings Ltd. We collect, use and are responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

Lloyd & Co Employee Benefits Ltd are a company registered in England and Wales 11552431.

Lloyd & Co Employee Benefits Ltd whose registered office is at 26 Houghton Street, Southport, PR9 0PA.

Lloyd & Co Employee Benefits Ltd is authorised and regulated by the Financial Conduct Authority and their Financial Services Register number is 830383.

We provide you with Employee Benefits Services.

How we obtain your personal data

- Information provided directly by you for the administration and running of your policy
- Information provided by your employer or insurer in relation to your policy
- Information provided by you when enquiring about our products and services
- Information we get from other sources

In order to provide you with a policy, and administer that policy, we require some personal information about you. This information may be provided via your application form (paper based or online), over the phone or via email and may include any of the information details in the section below “The personal data we collect and use”.

Where you are adding your partner or children to the policy we will also collect similar information for them. When providing their gender or medical information, this is classed as providing sensitive information under the UK General Data Protection Regulation (UK GDPR). You must have their explicit consent when supplying information about them to us. We do not knowingly collect personal data from children under the age of 16 without parental consent.

The personal data we collect and use

In the course of providing our service to you we may collect the following personal data when you or your employer provide it to us:

- Full name
- Address
- Company name
- Contact email (personal and/or work)
- Contact phone number
- Date of Birth
- Gender
- Family and dependant information
- National Insurance number
- Existing Policy or Benefits information
- Financial or Payment Details
- Health and medical information including any vulnerabilities and lifestyle information
- Employment details including salary
- Contact history
- Purchase history



- Claim details and history
- Marketing and contact preferences
- Online information and website use
- Feedback or Reviews
- Social media information and interactions
- Call recordings

We may also keep information contained in any correspondence you have with us via post or email. Please note, all calls to Lloyd & Co Employee Benefits Ltd are recorded.

Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary services*. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data and sometimes sensitive data with

us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From Insurers
 - Product details
 - Claims History

We may use legal public sources to obtain information about you, for example to verify your identity.

How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data

Reason for processing	Lawful Basis
Providing quotations; arranging, administering or amending insurance policies	Necessary for the performance of an insurance or employee benefits contract
Provision of information on products and services (Including through online promotions, advertisements and email marketing)	Our legitimate interests or your explicit consent
To communicate with you about your policy or product	Necessary for the performance of an insurance or employee benefits contract
To notify you of changes in our service	Our Legal and Regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our Legal and Regulatory obligations
To meet general legal or regulatory obligations	Our Legal and Regulatory obligations
To process your payments	Necessary for the performance of an insurance or employee benefits contract
Statistical Analysis	Our legitimate interests – to refine and enhance the products, pricing and service we offer
Historical information	Our Legal and Regulatory obligations and legitimate interest - to provide you with excellent customer service and provide staff training.
Provision of Employee Benefit Platform and associated services	Necessary for the performance of the employee benefits contract
Referral to services within the Lloyd & Co group	Our legitimate interest or your explicit consent



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How we share your data

We will keep information about you confidential and will only disclose your information with other third parties with your express consent, with the exception of the following categories:

- Insurance companies, regulatory authorities and other fraud prevention agencies for the purposes of fraud prevention and to comply with any legal and regulatory issues and disclosures;
- Any mailing or printing agents, contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential and comply with the UK General Data Protection Regulation (UK GDPR);
- Any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so.
- Any companies within the Lloyd & Co Group of companies.

Sharing your data with your employer

If your policy is administered through your employer, your basic details will be available to them in order to manage and administer your policy. We reserve the right to share information relating to your individual claims, or your state of health, with your employer, in cases of fraud.

Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- health information and lifestyle information when providing intermediary services in relation to a protection insurance product
- criminal conviction or offence information when providing *intermediary services* in relation to a general insurance product

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance or employee benefits contracts or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

Service Providers

We employ some third parties to provide some of benefits and ancillary services, as well as to perform specific functions on our behalf including hosting services and off-site back-ups. As a result, some providers do have indirect access to some of your personal data in order to deliver a service to us and you.

We have ensured that all of our service partners are UK GDPR compliant. For some of these services you will need to register your personal details with the provider to access these. Where this is the case you will be asked to accept their Terms and Conditions and Privacy Policy as part of this registration. We strongly recommend that you read and understand these before submitting your details, as these may be stored or transferred outside of the European Economic Area (EEA).



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Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 01704 321577

By email: compliance@lloydeb.co.uk

By Post: 26 Houghton Street, Southport, PR9 0PA

In addition, you can opt out of receiving marketing at any time by clicking the 'unsubscribe' link at the bottom of every marketing email.

Our website respects your privacy and recognises the importance of your online choices. We acknowledge the "Do Not Track" signal that may be sent from your web browser. However, currently we do not respond to DNT signals or similar mechanisms.

If you wish to disable tracking, you can adjust this on the consent preferences on our website. Please note that if you choose to disable cookies, some features of our website may not function properly.

Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with *intermediary services*.

How long your personal data will be kept

We keep information in line with the retention policy of our organisation. These retention periods are in line with the length of time we need to keep your personal information in order to manage and administer your policy and handle any claims. They also take into account our need to meet any legal, statutory and regulatory obligations. These reasons can vary from one piece of information to the next. In all cases our need to use your personal information will be regularly reassessed and information which is no longer required will be disposed of confidentially.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see 'Your rights' below.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data



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We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

The right you have under the data protection regulation also extend to your children, where their information has been provided to us.

If you are a parent or guardian and believe that your child has provided us with personal data without your consent, please contact us so we can take appropriate steps to delete such information.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

If you are a parent or guardian and believe that your child has provided us with personal data, please contact us so we can take appropriate steps to delete such information.

To restrict our use of personal data

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.



To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

To contest decisions based on automatic decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision making processes to protect your rights and freedoms.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- Email or write to our Data Protection Officer at compliance@lloydeb.co.uk or 26 Hoghton Street, Southport, PR9 0PA
- Let us have enough information to identify you, e.g. name, address, date of birth;
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know the information to which your request relates.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with cover or services.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.



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Policy Changes

This Privacy Policy is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We suggest that you review this Privacy Policy from time to time to ensure you are aware of any changes we may have made; however, we will not significantly change how we use information you have already given to us without your prior agreement.

The latest version of this Policy can always be found at www.lloydeb.co.uk

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office (ICO). It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer , please send an email to compliance@lloydeb.co.uk or write to 26 Hoghton Street, Southport, PR9 0PA



Glossary of Terms

we, us or our	Lloyd & Co Employee Benefits Ltd A company registered in (England and Wales) (Scotland) (company number 11552431) and having its registered office at 26 Hoghton Street, Southport, PR9 0PA
contact information	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address
data controller	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, we are your data controller as we determine how we will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of us providing you with <i>intermediary services</i>
data protection regulation	applicable data privacy and protection laws
employment status	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance
FCA	the Financial Conduct Authority, being the independent watchdog that regulates financial services
financial information	this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60
health information	this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history
identity information	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number
intermediary services	these are the services we provide to you in relation to the products, which may

include:

- Employee Benefits Products
- Protection & Group Risk Products
- Healthcare related Products
- Employee Benefits Platform

lifestyle information this includes both work and leisure behaviour patterns. Most relevant to your *products* may be your smoker status, alcohol consumption, health, retirement age and exercise habits

product This is a product in which we provide you *intermediary* services for example Group Risk or Protection

product provider a company which protection and/or insurance products (for a list of product providers which we work with, please contact us – see *How to contact us* above)

sanction check information this is information relating to your politically exposed persons (PEPs) status and Her Majesty's Treasury financial sanctions status, which is recorded to prevent fraud and money laundering

vulnerability a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence)