

## Privacy Notice

This Fair Processing Notice (together with our website terms and conditions and any other documents referred to on it) sets out the basis on which any personal information we collect from you, or that you provide to us either directly or via an intermediary or broker, will be processed. In respect of the data we collect and process, we consider ourselves a Data Controller. Please read the following carefully to understand how we will treat your personal information.

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. We recommend you review this notice by clicking here:

[London Market Core Uses Information Notice](#)

## Collecting your data

We collect and use relevant information about you to provide you with your insurance cover or the insurance cover that benefits you and to meet our legal obligations.

We may collect a range of personal and business information supplied by you or third parties on your behalf.

Specifically we may collect the following information throughout the duration of your relationship with us:

- Basic personal details such as your name, address, date of birth or age, gender, marital status, and additional information about your insurance requirements
- Contact details (such as email addresses and telephone numbers) related to correspondents, brokers and/or other relevant connections to insurance business.
- Personal information and health information related to your insurance requirements and details of any specific claims.

We may also collect special category data, such as race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation when needed to provide insurance or process claims. This information will only be used for the specific purpose for which it was provided and to carry out the agreed service. In certain instances, we will also need to collect and process special category data relating to individuals who may benefit from the policy.

We are keen to ensure that you understand why we need your personal information. We, or the intermediary or broker would be happy to provide an explanation including the purposes for how it will be used and stored. Where necessary we will obtain your specific consent to use special category data. We may do this via an intermediary or broker.

We may collect data about other individuals, such as employees, family, or members of your household. If you give us information about another person, it is your responsibility to ensure and confirm that you have told that person why and how their personal data will be used and that you have that person's permission to provide that data (including any special category data) to us and for us to process it.

## Using Your Information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:-

- Assessing your application for a product, service or quote
- Providing and administering relevant insurance policies
  - Client care, including communicating with you
  - Payments to and from individuals
- Verify your identity and carry out anti-fraud/financial crime checks
- Handling claims
  - Managing insurance and reinsurance claims
  - Defending or prosecuting legal claims
  - Investigation or prosecuting fraud
- Dealing with complaints
- Renewals
  - Contacting the policyholder to renew your policy
  - Evaluating the risk to be covered and matching to appropriate policy/premium
  - Payment of premium
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

## **Retention of Your Information**

We will keep your personal data only for as long as it is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under your policy of insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

Retention of specific personal data may be necessary for one or more of the following reasons:

- To fulfil statutory or other regulatory requirements;
- To evidence events/agreements in case of disputes;
- To meet our operational needs;
- To save data for historical purposes.

Details of specific retention periods for different aspects of your personal data are available in our Detention Retention Policy which you can request from us, via our contact details below.

## **Sharing Your Information**

The way insurance works means that your information may be shared with, and used by, a number of third parties in the insurance sector for example, insurers, agents or brokers, reinsurers, loss adjusters, premium collection and claims validation processors and providers, sub-contractors, regulators, law enforcement agencies, fraud and crime prevention and detection agencies and compulsory insurance databases. We will only disclose your personal information in connection with the insurance cover that we provide and to the extent required or permitted by law.

We require all third parties to respect the security of your personal data. Parties processing data on our behalf are only permitted to process your personal data for specified purposes and in accordance with our instructions.

For a broader understanding of how personal data is managed within the insurance market, please refer to the [London Market Core Uses Information Notice](#) as above.

## **International Transfer**

We share your personal data within the Group. This will involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **Storing Your Information**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You have the right to:

**Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Please be advised that there may be consequences if you exercise your right to erasure. If you subsequently make a claim, it may be impossible to administer your claim without your personal data.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please Contact us as detailed below.

### Changes to our privacy notice

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. You should regularly check this Privacy Policy for updates. If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website.

### How to contact us:

For any questions or concerns relating to this Privacy Policy or our data protection practices or if you would like to exercise any of your rights as defined above, please contact us at:-

[enquiries@syndicate2525.co.uk](mailto:enquiries@syndicate2525.co.uk)

Syndicate 2525  
5th Floor Camomile Court,  
23 Camomile Street, London EC3A 7LL  
Telephone: +44 (0)20 7743 0900

At Lloyd's – Box 150  
One Lime Street, London  
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