

Lockton European Brokers Limited Privacy Notice

Last updated: 25th August 2021



LOCKTON®

UNCOMMONLY INDEPENDENT

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What is the purpose of this document?

Lockton European Brokers Limited is committed to protecting the privacy and security of **your personal data**.

This notice describes how **we**, as an **intermediary**, collect and use **personal data** about **you** during and after **your** engagement with **us**, in accordance with the Data Protection Laws. In particular this notice is designed to help **you** understand how **we** process **your personal data** through the insurance lifecycle. **Insurance** is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including **your personal data**, needs to be shared between different **insurance market participants**. The insurance market is committed to safeguarding that information.

This notice also aims to give **you** information on how Lockton European Brokers Limited ("Lockton") collects and **processes your personal data** through **your** use of this website, including any data **you** may provide through this website, for example when **you** sign up to our newsletter or fill in our contact us form. In particular, this notice, together with the [Terms of Use](#) and [Cookies Notice](#) sets out how **we** look after **your personal data** when **you** visit **our** website (regardless of where **you** visit it from) and tells **you** about **your** privacy rights and how the law protects **you**.

Lockton is committed to protecting the privacy needs of children and encourages parents and guardians to take an active role in their children's online activities and interests. Lockton **does not** intentionally collect information from children, and Lockton **does not** target its website to children.

It is important that **you** read this notice, together with any other privacy notice **we** may provide on specific occasions when **we** are collecting or **processing personal data** about **you**, so that **you** are aware of how and why **we** are using such information. This privacy notice supplements the other notices and is not intended to override them.

Controller

Lockton is a "**data controller**". This means that **we** are responsible for deciding how **we** hold and use **personal data** about **you**. **We** are required under the Data Protection Laws to notify **you** of the information contained in this privacy notice.

Our Data Protection Manager

We have appointed a **data protection manager** to oversee compliance with and questions in relation to this privacy notice.

If **you** have any questions about this privacy notice, including any requests to exercise **your** legal rights, please contact **our Data Protection Manager** using the details set out below:

Contact Details

Data Protection Manager

Lockton European Brokers Limited
Level 4
4 Sappers Street
Valletta VLT1320
Malta

Email: dataprotection@uk.lockton.com

Changes to this privacy notice and your duty to inform us of changes

This notice may be updated from time to time. We encourage you to review this notice regularly when you visit our website to learn more about how we are using your **personal data** and safeguarding your privacy.

This version is dated 25th August 2021 and historic versions can be obtained by contacting our **Data Protection Manager**.

It is important that the **personal data** we hold about **you** is accurate and current. Please keep **us** informed if **your personal data** changes during **your** relationship with **us**.

Third Party Links

Our website may, from time to time, contain links to and from third-party websites, plug-ins and applications, including without limitation websites of our partner networks and affiliates. Clicking on those links may allow third parties to collect or share data about you. Please note that these third-party websites have their own privacy notices and we do not control those websites or accept any responsibility or liability for these privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit. This notice is specific to our website.

Defined Terms

In this notice:

- **we, us or our** refers to Lockton European Brokers Limited, a limited liability company with company number C60331 and its registered office at Level 4, 4 Sappers Street, Valletta, VLT1320, Malta, an independent insurance and reinsurance intermediary authorised and regulated in Malta by the Malta Financial Services Authority (MFSA) under;
- **you or your**, refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants** (**you** may be a potential or actual policyholder, **insured**, **beneficiary** under a policy, their family member, **claimant** or other person involved in a claim or relevant to a policy).

There are other terms in **bold** with specific meanings. Those meanings can be found in **Section 12: Glossary of Key Terms**.

Contents of this privacy notice

This notice is provided in a layered format so you can click through to the specific areas sets out below:

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[3 – WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)

[4 – THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA](#)

[5 – CONSENT](#)

[6 – PROFILING AND AUTOMATED DECISION MAKING](#)

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[8 – RETENTION OF YOUR PERSONAL DATA](#)

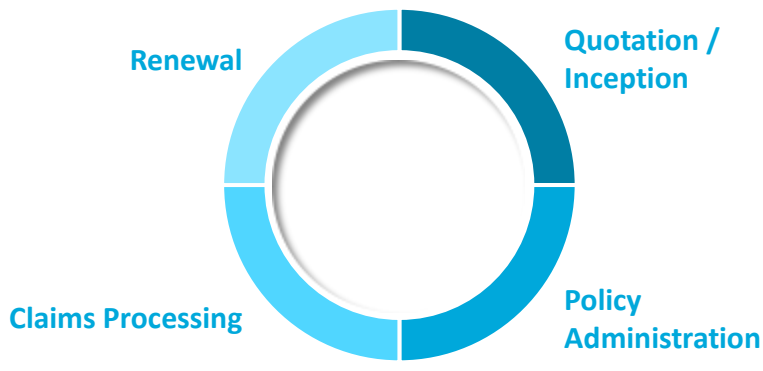
[9 – INTERNATIONAL TRANSFERS](#)

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Section 1: Introduction – How the insurance market works

INSURANCE LIFECYCLE:



FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE:

Stage of Insurance Lifecycle	You	Who has access to your Personal Data			
Quotation/ Inception	Policyholder/ Insured Beneficiary	Intermediary	Insurer	Intermediary	Reinsurer
Policy Administration	Claimant				
Claims Processing					
Renewal	Policyholder/ Insured Beneficiary				

Section 2: The data we may collect about you (Your Personal Data)

In order for **us** to obtain insurance quotes, place and administer insurance policies, and/or deal with any claims or complaints, **we** need to collect and process **personal data** about **you**.

The types of **personal data** that are **processed** may include:

Types of Personal Data	Details
Individual details ►	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details ►	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
Financial information ►	Bank account or payment card details, income or other financial information
Risk details ►	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data . For certain types of policy, this could also include telematics data
Policy information ►	Information about the quotes you receive and policies you take out
Credit and anti-fraud data ►	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies relating to you
Previous and current claims ►	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports
Special categories of personal data ►	Certain categories of personal data which have additional protection under the GDPR . The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation
Technical data ►	internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
Usage data ►	Information about how you use our website, products and services, including information from your visit from cookies, such as clickstream to, through and from our website (including date and time), items you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as clicks), and methods used to browse away from the page
Marketing and communications data ►	Your preference in receiving marketing from us and third parties and your communication preferences

Personal data does not include data where the identity has been removed (anonymous data).

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from **your personal data** but is not considered **personal data** in law as this data does **not** directly or indirectly reveal **your** identity. However, if **we** combine or connect aggregated data with **your personal data** so that it can directly or indirectly identify **you**, **we** treat the combined data as **personal data** which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where **we** need to collect **personal data** by law, or under the terms of a contract **we** have with **you** and **you** fail to provide that data when requested, **we** may not be able to perform the contract **we** have or are trying to enter into with **you** (for example, to provide you with insurance broking services). In this case, **we** may have to cancel a service **you** have with **us** but **we** will notify **you** if this is the case at the time.

Section 3: Where we might collect your personal data from

We might collect **your personal data** from various sources, including:

- **you** (for example by filling in forms or by corresponding with **us** by post, phone, email or otherwise. This includes personal data you provide when you:
 - make enquiries about or request our services;
 - subscribe to receive our newsletters or publications;
 - request marketing to be sent to you;
 - give us some feedback);
- **your** family members, employer (including trade or professional associations of which you are a member) or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as Transport Malta and the Inland Revenue Department;
- Technical Data from analytics providers such as Google;
- forms on our website, and Technical Data and Usage Data about your equipment, browsing actions and patterns from your interaction with our website. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Notice for further details;
- search information providers, e.g.:
 - Individual Details from publicly available sources such as the open electoral register and Malta Business Registry; or
 - Individual Details from data brokers or aggregators;
- claims forms;
- third parties who introduce business to us;
- in the event of a claim, third parties including the other party to the claim (**claimant**/defendant), witnesses, experts (including medical experts), loss adjustors, lawyers, and claims handlers.

Which of the above sources apply will depend on **your** particular circumstances.

For example, **we** might collect **your personal data** where:

- **you** have taken out an **insurance policy** through **us** (**you** are the **policyholder**), in which case **we** might collect **your personal data** from **you**, credit reference agencies, anti-fraud databases, sanctions lists etc;
- a third party (such as a family member or your employer) has taken out an **insurance policy** through **us** for **your** benefit (**you** are an **insured** or **beneficiary**), in which case **we** might collect **your personal data** from **your** family member, employer etc;
- **you** are a **claimant** or other person involved in a claim or relevant to a policy. E.g. **you** are making a claim against an **insurance policy** **you** have taken out through **us** or that a third party has taken out through **us** for **your** benefit, or **you** are making a claim against a third party's **insurance policy** that was taken out through **us**, or a third party is making a claim against an **insurance policy** **you** have taken out through **us**, in which case **we** might collect **your personal data** from **you**, other **insurance market participants**, witnesses, experts (including medical experts), loss adjustors, lawyers, and claims handlers etc.

Section 4: The purposes, categories, legal grounds and recipients, of our processing of your personal data

We set out below the purposes for which we might use your personal data:

Purposes

Relationship Management ►	<ul style="list-style-type: none">- To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract- Managing complaints that you may have
Quotation / Inception ►	<ul style="list-style-type: none">- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks- Evaluating the risks to be covered and matching to appropriate insurer/policy/premium- Payment of premium where the insured/policyholder is an individual
Policy Administration ►	<ul style="list-style-type: none">- Client care, including communicating with you and sending you updates- Payments to and from individuals
Claims Processing ►	<ul style="list-style-type: none">- Managing insurance and reinsurance claims- Defending or prosecuting legal claims- Investigation or prosecuting fraud
Renewals ►	<ul style="list-style-type: none">- Contacting the insured/policyholder to renew the insurance policy- Evaluating the risks to be covered and matching to appropriate policy/premium- Payment of premium where the insured/policyholder is an individual
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period ►	<ul style="list-style-type: none">- Complying with our legal and regulatory obligations- General risk modelling- Transferring books of business, company sales and reorganisations
Consultancy Services ►	<ul style="list-style-type: none">- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks- Client care, including communicating with you and sending you updates- Payments to and from individuals- General risk modelling- Analysis as part of the specific consultancy advice- Transferring books of business, company sales and reorganisations- Complying with our legal and regulatory obligations

Purposes

Website Management ►

- To administer and protect our business and this website and for internal operations, including to keep our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, including to ensure that content from our website is presented in the most effective manner for you and for your device

Marketing ►

- To make suggestions and recommendations to you about products or services that may be of interest to you, to provide industry insight or to invite you to events
- To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you

Please note that in addition to the disclosures **we** have identified against each purpose, **we** may also disclose **personal data** for those purposes to **our** service providers, contractors, agents and group companies that perform activities on **our** behalf.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Marketing communications from us

We may use **your Individual Details and Policy Information** to form a view on what **we** think **you** may want or need, or what may be of interest to **you**. This is how **we** decide which products, services, events and industry insight may be relevant for **you**.

You will receive marketing communications from **us** if **you** have requested information from **us** (including for example where you have provided your explicit consent by way of opting-in to receiving our marketing communications in accordance with applicable law) or purchased services from **us**, or (where you are a corporate entity) where we consider the marketing material to be relevant to you and, in each case, **you** have not opted out of receiving that marketing. Such marketing communications may include risk or insurance related information or details of services, or products, or events, which **we** think, may be of interest to **you**.

Third party marketing

We will get **your** express opt-in consent before **we** share **your** personal data with any company outside the

Lockton group of companies for marketing purposes.

We may share your personal data with other companies in the Lockton group of companies, if allowed and appropriate, for marketing purposes.

Managing your Marketing Preference (including Opting out)

You can manage your marketing preferences or ask **us** or third parties to stop sending **you** marketing messages at any time by following the opt-out links on any marketing message sent to **you** or by contacting our Data Protection Manager at any time.

Where **you** opt out of receiving these marketing messages, this will not apply to personal data provided to **us** as a result of a product/service purchase, product/service experience or other transactions, and will not affect communications relating to any such matters on which we are advising you.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Notice](#).

CHANGE OF PURPOSE

We will only use **your personal data** for the purposes for which **we** collected it, unless we reasonably consider that **we** need to use it for another reason and that reason is compatible with the original purpose. If **you** wish to get an explanation as to how the **processing** for the new purpose is compatible with the original purpose, please contact our Data Protection Manager.

If **we** need to use **your personal data** for an unrelated purpose, **we** will notify **you** and **we** will explain the legal basis which allows **us** to do so.

Please note that **we** may **process your personal data** without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

LEGAL GROUNDS FOR PROCESSING

We will only use **your personal data** when the law allows us to. In particular, **we** will rely on the following legal grounds to use **your personal data**:

For processing personal data and special categories of personal data

Legal ground	Details
Your explicit consent (optional)	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Manager
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject
In the public interest	Processing is necessary for the performance of a task carried out in the public interest
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data , in particular where you are a child. These legitimate interests are set out next to each purpose below

For processing special categories of personal data

Legal ground	Details
Your explicit consent (optional)	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Manager
Your explicit consent (necessary)	You have given your explicit consent to the processing of those personal data for one or more specified purposes, where we are unable to procure, provide or administer insurance cover without this consent. You are free to withdraw your consent by contacting our Data Protection Manager . However withdrawal of this consent will impact our ability to place or administer insurance or assist with the payment of claims. For more detail see Section 6: Consent

For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
In the substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or Maltese law

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the Purposes set out in the table above.

- Internal third parties: other companies in the Lockton Group (which means our subsidiaries and ultimate holding company and its subsidiaries) who provide IT and system administration services and undertake leadership reporting
- External third parties:
 - Service providers who provide IT and system administration services;
 - Professional advisers including lawyers, bankers, auditors and **insurers** who provide consultancy, banking, legal, insurance and accounting services;
 - Credit reference agencies;
 - Anti-fraud and sanctions database providers;
 - Other **insurance market participants** such as **intermediaries, insurers** and **reinsurers**;
 - Banks;
 - Claims handlers;
 - Lawyers;
 - Auditors;
 - Loss adjusters;
 - Experts;
 - Third parties involved in claims/investigations/prosecutions;
 - Private investigators;
 - Police;
 - Courts;
 - MFSA and other regulators; Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways **we** plan to use **your personal data**, including the categories of **personal data** and which of the legal bases **we** rely on to do so. **We** have also identified what **our** legitimate interests are where appropriate, and the third parties with whom **we** need to share **your personal data**.

Note that **we** may **process your personal data** for more than one lawful ground depending on the specific purpose for which **we** are using **your personal data**. Please contact **our Data Protection Manager** 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.

Purpose	Categories of Data	Legal Grounds	Disclosures
RELATIONSHIP MANAGEMENT To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract	Personal Data: <ul style="list-style-type: none"> - Individual details - Marketing and Communications Data 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - Compliance with a legal obligation - For our legitimate business interests (to correspond with you) 	
QUOTATION/INCEPTION Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - Compliance with a legal obligation - For our legitimate business interests (to ensure that the client is within our acceptable risk profile) - To assist with the prevention of crime and fraud 	<ul style="list-style-type: none"> - Credit reference agencies - Anti-fraud and sanctions databases
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data 	Special Categories of Personal Data: <ul style="list-style-type: none"> - In the substantial public interest - Consent 	
QUOTATION/INCEPTION Evaluating the risks to be covered and matching to appropriate insurer/policy/premium	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to determine the likely risk profile and appropriate insurer and insurance product) 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Credit and anti-fraud checks - Health Data 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent 	

Purpose	Categories of Data	Legal Grounds	Disclosures
QUOTATION/INCEPTION and POLICY ADMINISTRATION Payments to and from individuals, including collection or refunding of premiums, paying on claims, and processing other payments	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to recover debts due to us, and ensuring our clients are able to meet their financial obligations) 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers - Banks
POLICY ADMINISTRATION General client care, including communication with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy. Notifying you about changes to our terms or privacy notice	Personal Data: <ul style="list-style-type: none"> - Individual details - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) - Compliance with a legal obligation - Consent 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - Substantial public interest 	
CLAIMS PROCESSING Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to assist our clients in assessing and making claims) 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers - Claims handlers - Lawyers - Loss adjustors - Experts - Third parties involved in the claim (such as health care professionals)
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - For legal claims - Substantial public interest 	

Purpose	Categories of Data	Legal Grounds	Disclosures
CLAIMS PROCESSING Defending or prosecuting legal claims	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to assist in assessing and making claims) 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers - Claims handlers - Lawyers - Loss adjustors - Experts - Third parties involved in the claim (such as health care professionals)
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - For legal claims 	
CLAIMS PROCESSING Investigating and prosecuting fraud	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to assist with the prevention and detection of fraud) 	<ul style="list-style-type: none"> - Lawyers - Private investigators - Police - Experts - Third parties involved in the investigation or prosecution - Other insurance market participants such as intermediaries, insurers and reinsurers - Anti-fraud databases
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Health data - Criminal records data - Other sensitive data - Credit and anti-fraud data - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - For legal claims - In the substantial public interest 	
RENEWALS Contacting you in order to renew the insurance policy	Personal Data: <ul style="list-style-type: none"> - Individual details - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) - Consent 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent 	

Purpose	Categories of Data	Legal Grounds	Disclosures
THROUGHOUT THE INSURANCE LIFECYCLE Transferring books of business, company sales and reorganisations. To administer and protect our business	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information - Policy information - Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) - Compliance with a legal obligation 	<ul style="list-style-type: none"> - Group companies - Courts - Purchaser (potential and actual)
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data - Risk details - Previous claims - Current claims - Health Data 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - In the substantial public interest 	
THROUGHOUT THE INSURANCE LIFECYCLE General risk modelling and underwriting	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information - Policy information 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (to build risk models that allow placing of risk with appropriate insurers) 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent 	
THROUGHOUT THE INSURANCE LIFECYCLE Complying with our legal or regulatory obligations	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information - Policy information - Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> - Compliance with a legal obligation 	<ul style="list-style-type: none"> - IDPC, MFSA and other regulators - Police - Other insurance market participants such as intermediaries, insurers and reinsurers (under court order) - Insurance Fraud database - Auditors
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - For legal claims - In the substantial public interest 	

Purpose	Categories of Data	Legal Grounds	Disclosures
CONSULTANCY SERVICES Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks	Personal Data: <ul style="list-style-type: none"> - Individual details - Identification details - Financial information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - Compliance with a legal obligation - For our legitimate business interests (to ensure that the client is within our acceptable risk profile) - To assist with the prevention of crime and fraud 	<ul style="list-style-type: none"> - Credit reference agencies - Anti-fraud and sanctions databases
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Credit and anti-fraud data 	Special Categories of Personal Data: <ul style="list-style-type: none"> - In the substantial public interest - Consent 	
CONSULTANCY SERVICES Client care, including communicating with you and sending you updates	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial Information - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to correspond with clients in order to provide consultancy services) - Compliance with a legal obligation - Consent 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent 	
CONSULTANCY SERVICES Payments to and from individuals	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to recover debts due to us, and ensuring our clients are able to meet their financial obligations) 	<ul style="list-style-type: none"> - Other insurance market participants such as intermediaries, insurers and reinsurers - Banks

Purpose	Categories of Data	Legal Grounds	Disclosures
CONSULTANCY SERVICES General risk modelling	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial information - Policy information 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (to build risk models that allow placing of risk with appropriate insurers) 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent 	
CONSULTANCY SERVICES Analysis as part of the specific consultancy advice	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial information - Policy information 	Personal Data: <ul style="list-style-type: none"> - Performance of our contract with you - For our legitimate business interests (to provide the consultancy services) - Compliance with a legal obligation - Consent 	
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent 	
CONSULTANCY SERVICES Transferring books of business, company sales and reorganisations	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial information - Policy information - Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) - Compliance with a legal obligation 	<ul style="list-style-type: none"> - Group companies - Courts - Purchaser (potential and actual)
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims - Health Data 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - In the substantial public interest 	

Purpose	Categories of Data	Legal Grounds	Disclosures
CONSULTANCY SERVICES Complying with our legal or regulatory obligations	Personal Data: <ul style="list-style-type: none"> - Individual details - Financial information - Policy information - Marketing and communications data 	Personal Data: <ul style="list-style-type: none"> - Compliance with a legal obligation 	<ul style="list-style-type: none"> - IDPC, MFSA and other regulators - Police - Other insurance market participants such as intermediaries, insurers and reinsurers (under court order) - Auditors
	Special Categories of Personal Data: <ul style="list-style-type: none"> - Risk details - Previous claims - Current claims 	Special Categories of Personal Data: <ul style="list-style-type: none"> - Consent - For legal claims - In the substantial public interest 	
WEBSITE MANAGEMENT To administer and protect this website and for internal operations, including to keep our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes	Personal Data: <ul style="list-style-type: none"> - Individual Details - Technical Data - Marketing and Communications Data 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of business reorganisation or group restructuring exercise) - Compliance with a legal obligation 	<ul style="list-style-type: none"> - Internal third parties - External third party service providers who provide IT and system administration services - Purchaser - Courts - R IDPC, MFSA and other regulators - Police - Professional advisers
WEBSITE MANAGEMENT To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, including to ensure that content from our website is presented in the most effective manner for you and for your device	Personal Data: <ul style="list-style-type: none"> - Technical Data - Usage Data 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) 	<ul style="list-style-type: none"> - External third party service providers who provide IT and system administration services
MARKETING To make suggestions and recommendations to you about products, services or events that may be of interest to you and to provide industry insight	Personal Data: <ul style="list-style-type: none"> - Individual details - Policy information - Technical Data - Usage Data - Marketing and Communications Data 	Personal Data: <ul style="list-style-type: none"> - For our legitimate interests (to develop our products/services and grow our business) - Explicit consent (optional) (where required by law) 	

Purpose	Categories of Data	Legal Grounds	Disclosures
MARKETING To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you	Personal Data: <ul style="list-style-type: none"> - Individual Details - Marketing and Communications Data - Technical Data - Usage Data 	Personal Data: <ul style="list-style-type: none"> - For our legitimate business interests (to understand how customers use our products and services, to develop them and grow our business, and to inform our marketing strategy) 	

Section 5: Consent

In order to arrange and provide insurance cover and deal with insurance claims in certain circumstances **we** and other **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing may be necessary for us and the other insurance market participants to achieve this.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our, and the other insurance market participants', ability to place, administer and provide insurance or pay claims.

Section 6: Profiling and automated decision making

When calculating insurance **premiums** **insurance market participants** may compare your **personal data** against industry averages. **Your personal data** may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure **premiums** reflect risk.

Profiling may also be used by **insurance market participants** to assess information **you** provide to understand fraud patterns. Where **special categories of personal data** are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, **your special categories of personal data** may also be used for profiling. **Insurance market participants** might make some decisions based on profiling and without staff intervention (known as automatic decision making). **Insurance market participants** will provide details of any automated decision making they undertake without staff intervention in their information notices and upon request including:

- where they use such automated decision making;
- the logic involved;
- the consequences of the automated decision making;
- any facility for **you** to have the logic explained to **you** and to submit further information so the decision may be reconsidered.

Section 7: Data security

Unfortunately, the transmission of data over the internet or any website cannot be guaranteed to be completely secure from intrusion. However, **we** have put in place appropriate physical, electronic and procedural security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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.

Section 8: Retention of your personal data

We will keep **your personal data** only for so long as 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 or in relation to **your insurance**, or where **we** are required to keep **your personal data** due to legal, regulatory, accounting or reporting reasons.

To determine the appropriate retention period for **personal data**, we consider the amount, nature, and sensitivity of the **personal data**, the potential risk of harm from unauthorised disclosure of your **personal data**, the purposes for which we **process** your **personal data** and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your **personal data**: see **Section 11 (Your Rights and Contact Details of the IDPC)** below.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Section 9: International transfers

We may need to transfer **your** data to **insurance market participants** or other companies within the Lockton group or their respective affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact **our Data Protection Manager**.

Section 10: Your rights and contact details of the ICO

If **you** have any questions about this privacy notice or in relation to **our** use of **your personal data**, **you** should first contact **our Data Protection Manager**. Under certain conditions, **you** may have the right to require us to:

- provide **you** with further details on the use **we** make of **your personal data/special category of data**;
- provide **you** with a copy of the **personal data** that **you** have provided to us;
- update any inaccuracies in the **personal data** **we** hold;
- delete any **special category of personal data/personal data** that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights;
- object to direct marketing; and
- restrict how **we** use **your personal data** whilst a complaint is being investigated.

In certain circumstances, **we** may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege).

If **you** wish to exercise any of the rights set out above, please contact **our** Data Protection Manager.

No fee usually required

You will not have to pay a fee to access **your personal data** (or to exercise any of the other rights). However, **we** may charge a reasonable fee if **your** request is clearly unfounded, repetitive or excessive. Alternatively, **we** may refuse to comply with **your** request in these circumstances.

What we may need from you

We may need to request specific information from **you** to help **us** confirm **your** identity and ensure **your** right to access **your personal data** (or to exercise any of **your** other rights). This is a security measure to ensure that **personal data** is not disclosed to any person who has no right to receive it. **We** may also contact **you** to ask **you** for further information in relation to **your** request to speed up **our** response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take **us** longer than a month if **your** request is particularly complex or **you** have made a number of requests. In this case, **we** will notify **you** and keep **you** updated.

Your Right to Complain to the IDPC

If **you** are not satisfied with **our** use of **your personal data** or our response to any request by **you** to exercise any of **your** rights in **Section 11: Your Rights and Contact Details of the IDPC**, or if **you** think that **we** have breached the **GDPR**, then **you** have the right to complain to the **Information and Data Protection Commission (IDPC)**, the Maltese supervisory authority for data protection issues. Please see below for contact details of the **IDPC**.

We would, however, appreciate the chance to deal with **your** concerns before **you** approach the **IDPC** so please contact **us** in the first instance.

Office of the Information and Data Protection Commission

Floor 2, Airways House
High Street
Sliema SLM1549
Malta

Tel: 2328 7100

Email: idpc.info@idpc.org.mt

Section 11: Glossary of key terms

Key insurance terms

Beneficiary is an individual or a company that an **insurance policy** states may receive a payment under the **insurance policy** if an insured event occurs. A beneficiary does not have to be the **insured/policyholder** and there may be more than one beneficiary under an **insurance policy**.

Claimant is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**.

Claims processing is the process of handling a claim that is made under an **insurance policy**.

Quotation is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**.

Inception is when the **insurance policy** starts.

Insurance is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**.

Insurance policy is a contract of insurance between the **insurer** and the **insured/policyholder**.

Insurance market participant(s) or participants: is an **intermediary, insurer or reinsurer**.

Insured/policyholder is the individual or company in whose name the **insurance policy** is issued. A potential **insured/policyholder** may approach an **intermediary** to purchase an **insurance policy** or they may approach an **insurer** directly or via a price comparison website.

Insurers: (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium**. An **insurer** may also be a **reinsurer**.

Intermediaries help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**.

Policy administration is the process of administering and managing an **insurance policy** following its **inception**.

Premium is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**.

Reinsurers provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance.

Renewal is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry.

We, us or **our** refers to Lockton European Brokers Limited, a limited liability company with company number C60331 and its registered office at Level 4, 4 Sappers Street, Valletta, VLT1320 an independent insurance and reinsurance intermediary authorised and regulated in Malta by the Malta Financial Services Authority (MFSA) under Firm Reference Number.

You or **your** refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants**. **You** may be the insured, beneficiary, **claimant** or other person involved in a claim or relevant to an **insurance policy**.

Key data protection terms

Data Protection Laws means all laws and regulations relating to the Processing of Personal Data, including the GDPR, as the same may be in force from time to time.

GDPR is the EU General Data Protection Regulation and the new Data Protection Act 2018 (Chapter 586 of the Laws of Malta), which replaced the Data Protection Act 2001 (Chapter 440 of the Laws of Malta) on 28 May 2018.

Data Controller is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used.

Information and Data Protection Commission (IDPC) is the regulator (or National Competent Authority/Data Protection Authority) for data protection matters in Malta.

Personal Data is any data from **you** which can be identified and which relates to **you**. It may include data about any claims **you** make.

Processing of personal data includes collecting, using, storing, disclosing or erasing your personal data.

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