



## Privacy Notice

Managing Agency Partners Ltd (“MAP” or “we”) is committed to the protection of information which identifies and relates to you or other individuals (“personal information”) and to compliance with data protection laws

Please read this privacy notice carefully as it sets out MAP’s practices in relation to the personal information that we collect. It provides information about how we use personal information and the rights available to you under data protection laws.

### The persons to which this Privacy Notice applies:

This notice is directed to policyholders, clients, suppliers, brokers, advisers, service providers, beneficiaries or claimants and their agents and relatives (“you”).

### Layered approach

We collect personal data for use in the administration of insurance policies and reinsurance contracts. The way that the Lloyd’s insurance market works means that multiple organisations can be involved in the underwriting and administration. We have determined that the best way of providing you with the information required by law is to adopt a layered approach. This enables us to provide the key privacy information immediately whilst having more detailed information available elsewhere for those who want it.

There are three documents that comprise the layered approach:

1. A ***Short Form Privacy Notice*** in your policy related documentation.
2. The Short Form Privacy Notice refers to this ***Privacy Notice***
3. This Privacy Notice provides a link to the ***London Markets Core Uses Information Notice***. This is an insurance market standard information notice that explains in more detail how the insurance market works and uses personal information to provide insurance cover. This notice can be accessed through this link: <https://www.londonmarketgroup.co.uk/gdpr>

### How this Privacy Notice Works

This privacy notice is intended to explain our privacy practices and covers the following areas:

1. What information do we collect about you
2. Why we collect this information
3. How we may use your personal information
4. Consent
5. Sharing your personal information
6. Transmission, storage and security of your personal information
7. Retention of your personal information
8. Your rights
9. Contacting us
10. Changes to this privacy notice
11. Website
12. Your right to complain

#### 1. What information do we collect about you

We may collect and process the following personal information about you:

- information including your name, address, contact details
- details relating to a claim (which depending on the nature of the claim may include medical reports and reports of criminal convictions or crime) that you, your employer or organisation



- whom we insure or reinsure or a third party claimant provide to us in relation to the administration of an insurance policy that we insure or re-insure;
- information relating to any criminal or fraudulent activities provided to us by you or third parties (such as law enforcement, anti-fraud agencies or other insurers);
  - if you contact us, we may keep a record of that correspondence, voicemail or details of any conversation we may have with you; and
  - information that is available from publically available sources including social media websites.

## 2. Why we collect this information

We may process personal information for certain legitimate or lawful purposes in some or all of the following ways:

- to enhance the security of our network and information systems;
- to identify and prevent fraud;
- to maintain our accounts and records;
- to modify, personalise or otherwise improve our services and communications;
- to comply with foreign law, law enforcement, court and regulatory bodies' requirements;
- to defend or make claims;
- to correspond with clients, beneficiaries and claimants in order to facilitate the insurance policies;
- to comply with a legal obligation;
- to protect your vital interest or the interest of another individual;
- to gather market intelligence,
- for training and quality purposes;
- for the performance of a contract with you or to take steps to enter into a contract; and
- for the performance of a task carried out in the public interest or in the exercise of an official authority.

## 3. How we may use your personal information

We may use your personal information in the following ways:

- to communicate with you or your agent/broker in connection to the provision of insurance services or cover;
- to make decisions on whether to provide insurance services;
- to manage your insurance policy including underwriting and claims handling;
- to monitor transactions to ensure service quality, compliance with procedures, to combat fraud and insure compliance with UK/EU and international sanctions;
- to identify you and to carry out any identity checks as may be required by applicable law and best practice at any given time;
- to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action;
- to analyse it in order to understand the service we provide and in order to improve our business;
- to manage our infrastructure, business operations and comply with internal policies and procedures;

We will not process your data where these interests are overridden by your interests.

## 4. Consent

Your consent to our processing of your personal information for certain purposes may be necessary to comply with applicable data protection laws; and where this is the case we will ask you for your consent in accordance with those laws.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent in relation to insurance cover that we have provided then this is likely to impact our ability to provide insurance cover and pay claims under the cover.



## 5. Sharing your personal information

MAP may make personal information available to:

- **Other third parties**

We may permit selected third parties and agents including suppliers, service providers, and financial organisations access to your personal information for the purposes set out above. All such exchanges will be made in accordance with applicable laws. If false or inaccurate information is provided and/or fraud is identified or suspected, details may be passed to fraud prevention and anti-money laundering agencies, law enforcement agencies or other insurers and may be recorded by us or by them.

We and other organisations may also access and use this information to prevent fraud and other crime, for example when deciding whether to make a payment to you under an insurance or reinsurance policy;

We, and other organisations that may access and use information recorded by fraud prevention agencies, may do so from other countries including outside the EEA.

- **Governmental authorities and third parties involved in court actions**

We may disclose your personal information to third parties, the courts and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or in order to enable MAP to comply with its regulatory requirements or dialogue with its regulators as applicable.

## 6. Transmission, storage and security of your personal information

No data transmission over the Internet can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with applicable data protection laws.

All information within our control is stored on secure servers (or secure hard copies) and accessed and used subject to our security policies.

Where MAP discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

Your personal information may be accessed by staff or authorised third parties and, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) where the data protection laws may be of a lower standard than in the EEA. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the EEA.

## 7. Retention of your personal information

We will retain your personal information for as long as is reasonably necessary for the purposes listed in Section 2 of this Privacy Notice. In determining how long we retain personal information we will consider factors such as the possibility that it may be needed in connection with a claim under an insurance policy, or where we are obliged to keep it to comply with tax, accounting, regulatory or legal requirements.

We maintain a data retention policy which we apply to data in our care. Where your personal information is no longer required we will ensure it is securely deleted.



## 8. Your rights

You have rights in relation to the personal information we hold about you. These may include the following:

- the right to be provided with further details on the use we make of your personal information;
- the right to be provided with a copy of the personal information we hold about you;
- the correction of any inaccuracies in the personal information we hold about you;
- deletion any of your personal information that we no longer have a lawful ground to use;
- where processing is based on consent, the right to stop that particular processing by withdrawing your consent;
- the right to object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- the right to restrict how we use your personal information whilst a complaint is being investigated; and
- the transfer your personal information to a third party in a standardised machine-readable format.

In certain circumstances, we may need to restrict your 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).

## 9. Contacting us

You can contact us about privacy related issues by:

- sending an email to [DPM@mapunderwriting.co.uk](mailto:DPM@mapunderwriting.co.uk), or
- writing to the Data Protection Manager, Fitzwilliam House, 10 St Mary Axe, London. EC3M 8EN.

## 10. Changes to our Privacy Notice

We may change the content of our website or services without notice, and consequently our Privacy Notice may change at any time in the future. We therefore encourage you to review it from time to time to stay informed of how we are using personal information.

This Privacy Notice was last updated on 21 May 2018.

## 11. MAP's website

We do not use cookies on our website.

Our website may contain links to other websites. This Privacy Notice only applies to MAP and to this website so when you link to other websites you should read their own privacy policies. We do not accept any responsibility or liability for their policies or processing of your personal information.

## 12. Your right to complain

You have the right to complain to the ICO, the authority that supervises our processing of your personal information, should you not be satisfied with our use of your personal information or our response to any request you make to us relating to the exercise of your data protection rights, or if you think that we have breached any relevant data protection laws.

The ICO website link is: <https://ico.org.uk/>.