



DATA PRIVACY NOTICE

1. WHO WE ARE

This Data Privacy Notice (“Privacy Notice”) sets out the basis on which Alpha Insurance Analysts Limited (“Alpha”, “we” or “us”) collect information from you.

We gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This privacy notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Alpha Insurance Analysts Limited’s registered office is at 107 Fenchurch Street, London, EC3M 5JF. Alpha is a company registered in England and Wales with the company number 2915929 and is registered with the Information Commissioner’s office as a data controller with the registration number Z1071668. Alpha’s Compliance Officer, Jenny Doyle, is the person responsible for data protection at Alpha.

Alpha is committed to protecting your privacy. We comply with the principles of the data protection laws including General Data Protection Regulation (GDPR) and aim to maintain consistently high levels of best practice in our processing of personal and/or sensitive data.

2. WHY AND WHEN DO WE PROCESS YOUR PERSONAL DATA

Alpha processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our service. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

We may collect and process personal information about you:

- When you contact us to enquire about our services;
- For you and Alpha to enter into a contractual relationship with us and to enable us to provide the service required;
- If you contact us by telephone or email or via our website for any other reason;

We collect data from you in the following ways: -

- On an Alpha Fact Find or Lloyd’s form for updating Lloyd’s records or for a new application for membership, conversion or change of control or following a request from Lloyd’s.
- Annually, on your Know Your Principal (KYP), Risk Profile or Fact Find form.
- As part of routine correspondence with you.

3. WHAT INFORMATION DO WE COLLECT AND HOLD ABOUT YOU?

We collect and retain the following personal data and information for you either as an unlimited member, or for you and for any participants if you underwrite through a limited liability vehicle.

- Individual details – name, address (proof of address) and other contact details including your telephone numbers, your 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 to you by government bodies or agencies including your national insurance, Unique Tax Payer Reference, passport, driving licence and Financial Services Authority/Prudential Regulation Authority ID numbers;
- Credit and anti-fraud data – your credit history, credit score, sanctions, politically exposed person status, information on criminal offences and from anti-money laundering, sanctions screening and anti-fraud databases relating to you;
- Financial information – details of your funds at Lloyd’s, your underwriting portfolio, your auction activities, bank details and financial information relating to you and your family including assets and liabilities, income and source of wealth information. We will also keep information or certification from you which we request to establish whether you have sufficient knowledge and experience to invest in Lloyd’s.
- Special categories of personal data: health/medical information and criminal convictions.

We also hold the following data on our files:

- Specific information which may be required by Fidentia Services LLP (Fidentia) or Nomina plc (Nomina) if you underwrite through a limited liability vehicle managed by Fidentia or Nomina which may include details of your personal financial or tax position;
- Your password for the website private client area and memorable word for ID purposes;

4. HOW DO WE USE THE DATA YOU PROVIDE TO US?

The legal basis for which we process your personal data may be:

- To enable us to perform our obligations to you under the Members’ Agency Agreement or our contract for the provision of our services for you or the limited liability vehicle in which you do (existing LLVs) or will (new LLVs) participate either during or prior to entering into that contract with you;
- To comply with a legal obligation to which we are subject, such as for identification and verification purposes and to meet requirements of a regulatory authority including the Corporation of Lloyd’s;
- For legitimate interests offered by us or a third party including providing you with information, products or services that we believe will be of interest to you or where you have consented to be contacted for such purposes. This includes marketing information for a third party such as for the sale of a LLV or a reinsurance product;
- Where you have given consent to us to do so including the processing of special categories of personal data.

We do not disclose your personal data to any third parties except as stated in this privacy notice, as permitted or required by law, or as authorised by you.

We share your data with with the Corporation of Lloyd’s, the managing agents of the syndicates on which you participate and Fidentia or Nomina (if either of these companies manages a LLV in which you participate), when required to do so in respect of the business and your underwriting affairs at Lloyd’s. We will also provide data to reinsurance providers where appropriate.

We may disclose your personal data to other companies who provide services to us including data management providers, IT providers, email delivery services, website hosts, company secretarial providers, auditing and other third party services, or in the event of any merger, sale or other transfer of all or part of our business.

We are under a duty to disclose or share your personal data to perform our contract with you or to comply with our legal and regulatory obligations.

We do not sell, trade, or rent your personal information to others.

5. HOW DO WE PROTECT YOUR DATA?

As required by the data protection laws we follow strict security procedures in the storage and disclosure of information you have given to us.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Access to these servers is restricted to our directors, employees and staff seconded to us by the Corporation of Lloyd's under our outsourcing agreement for the provision of member administration services until 30 June.

We also store data relating to your underwriting affairs at Lloyd's that can be accessed by you using a password through our secure private client area of our website. We do not have access to your password. Where you have been assigned an automated password (or where you have chosen one) which enables you to access our website, you are responsible for keeping this password confidential and for changing it every few months to ensure it is kept secure. We ask you not to share a password with anyone.

In the case of communications by email you should note that, as emails are not encrypted (and may therefore be intercepted by third parties) and as the identity of the sender cannot be confirmed, you must NOT provide your security or personal details by email.

If you provide us with personal data including ID documents, financial information or bank details, we will keep such documents and information secure. We will ensure that the bank details are only passed on to third parties with your consent.

If we provide information to a third party, we will exercise the strictest control over the third party contractually, requiring it to:

- Maintain the security and confidentiality of the information and restrict access to those of its own employees;
- Use the data for the agreed purpose only and prevent it being used for any other purpose by any other party;
- Refrain from communicating with you other than concerning the issue in question;
- Return the data to us at the conclusion of any contract term and destroy or delete any copies made of all or any part of the information unless copies are needed to be kept to comply with regulations.
- In addition, we will restrict the information disclosed to the absolute minimum necessary, for example, to provide a product or service.

Our own security procedures mean that we may occasionally have to request proof of identity (ID) and in the event of telephone calls from you, we also reserve the right to ask security questions in order to satisfy ourselves that you are who you say you are.

6. RETENTION OF YOUR PERSONAL DATA

We will keep your personal data for as long as is necessary for the purpose(s) for which it was collected, following which it will be deleted. The period for which we keep your personal data will include any period which may be necessary for the performance of a contractual relationship between us or where we are required to keep your personal data for legal or regulatory reasons.

7. RECORDING TELEPHONE CALLS

We may monitor or record telephone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes.

8. YOUR RIGHTS

You can write to us to obtain further details about the personal data that we hold about you, the purpose for which we hold it, how long we will store it and, if we did not collect it, where it came from:

Our contact details are:

Alpha Insurance Analysts Limited
107 Fenchurch Street
London
EC3M 5JF
Email: alpha@aianalysts.com

You have the right to:

- Ask us to correct and/or complete the information, if you believe that we hold any incomplete or inaccurate data about you. We will strive to do so as quickly as possible unless there is a valid reason for not doing so at which point we will notify you.
- Ask us to delete any personal data that we no longer have a lawful purpose to use.
- If we are processing with your consent (as opposed to under a legal obligation or for legitimate interests), you have a right to withdraw that consent.
- Object to us using data for legitimate interests (such as marketing the sale of a LLV to you).

9. LODGING A COMPLAINT

Alpha only processes your personal data in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data, or are unsatisfied with how we have handled your data, you have the right to lodge a complaint with Information Commissioner's Officer (ICO):

The ICO details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Fax: 01625 524 510
casework@ico.org.uk

If you have any questions about this Data Privacy Notice please contact our Compliance Officer, Jenny Doyle, on 0207 767 3421 or jenny@aianalysts.com.

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