



## NOTICE OF PROCESSING OF PERSONAL DATA

### WHO IS USING YOUR PERSONAL DATA

**Placing Platform Limited**, whose registered office is at 78 Leadenhall Street, London, EC3A 3DH ("**PPL**", "**we**", "**us**", "**our**"). PPL provides a placing platform for insurance contracts for use by brokers and insurers (each a "**User**").

The placing platform is an electronic platform to support the more flexible negotiation and faster placement of electronic risk and is a key component of the London Market modernisation programme designed to make the market easier to do business with ("**Platform**"). In providing the Platform, we will act as a '[processor](#)' in relation to your personal data and the relevant User, who will most likely be your employer, will act as a '[controller](#)'.

The Platform is accessible at [prod.placingplatformlimited.com](http://prod.placingplatformlimited.com) ("**Website**"), which is maintained and supported by **Ebix Europe Limited**, whose registered address is 4<sup>th</sup> Floor, Dashwood House, 69 Old Broad Street, London UK, EC2M 1QS ("**Ebix**"). Ebix is acting in the capacity as a 'sub-processor' and will comply with the instructions of us and the relevant User.

### SCOPE OF THIS NOTICE

Please read this notice carefully. It applies to the treatment of any information that could be used to identify you as an individual and which is collected through your use or interaction with the Platform and the Website ("[personal data](#)"). The protection of your personal data is very important to us, and we understand our responsibilities to handle your personal data with care, to keep it secure and to comply with legal requirements.

This notice is not intended to override the terms of any contract that you or any relevant User may have with us (for example a market user agreement governing a User's use of the Platform), or that you may have with any relevant User, or any rights you might have available under applicable data protection laws.

We may make changes to this notice from time to time, for example to keep it up to date or to comply with legal requirements or changes in the way we operate our business. We will notify you about significant changes by prominently posting a notice on the application which will have to be read after you log on to the application and before you can access the dashboard.

We encourage you to regularly check back and review this policy so that you will always know what information we collect, how we use it, and who we share it with.

### WHAT PERSONAL DATA DO WE COLLECT?

We will process the personal data that you provide to us and/or the User or any person acting on behalf of a User and/or which you record when using the Platform, in particular your [contact details](#), including your full name, job title, employment details including your employer, your business email address and telephone number and your Platform log in details. In limited circumstances when you contact us for support, this might also include the limited details that you make available in relation to the issue.

When you use the Website, we will also automatically collect device data including IP address and operating system, details about your browsing history whilst on the platform, browser type, session frequency, and cookies. Please see our separate policy for further details about cookies, or for more detailed information on deleting and controlling cookies visit [www.AboutCookies.org](http://www.AboutCookies.org).

We comply with the data minimisation principles of data protection laws and we will not collect any personal data from you we do not need in order to provide and oversee the Platform. In particular, we do not collect any [special categories of data](#), in the general course of providing services in connection with the



Platform or through making the Website available, unless required and only when we have an appropriate legal basis to do so.

### WHEN DO WE COLLECT YOUR PERSONAL DATA?

We will collect information from you *directly* when you use the Website. To the extent permitted by law, we may also monitor and record telephone calls for training and quality assurance purposes when you call the Platform help desk *directly* for user support.

Information about you may also be provided to us *indirectly* by a User.

### WHAT PURPOSE DO WE USE YOUR DATA FOR?

We need to process your **contact details** in order to operate the Platform. We would like to use this information to inform you of anything that may impact your ability to make use of the services, including the Website and Platform. If you do not provide this information, it may result in us being unable to provide the electronic risk placement service.

We will collect your **device data** to provide and operate the Platform and the Website; to further develop, customise and improve the Platform and the Website based on visitors' and users' common or personal preferences, experiences and difficulties; to provide ongoing customer assistance and technical support; to enhance our data security and fraud prevention capabilities and to comply with any applicable laws and regulations.

We have to establish a legal ground to use your personal data, so we will make sure that we only use your personal data for the purposes set out above where we are satisfied that:

- our use of your personal data is necessary to support 'Legitimate Interests' that we have as a business (namely, to improve our products or services, to provide help or support in connection with the Platform and Website, to ensure that the Platform and Website operate efficiently and securely and to carry out analytics across our datasets), provided it is always carried out in a way that is proportionate, and that respects your privacy rights; and/or
- our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we are subject to (e.g. to comply with FCA or ICO requirements).

Before collecting and/or using any special categories of data we will establish an additional lawful ground to those set out above which will allow us to use that information. This additional exemption will typically be:

- your explicit consent;
- the establishment, exercise or defence by us or third parties of legal claims; or
- a specific exemption provided under local laws of EU Member States and other countries implementing the GDPR.

**PLEASE NOTE.** If you provide your explicit consent to allow us to process your special categories of data, you may withdraw your consent to such processing at any time. However, you should be aware that if you choose to do so we may be unable to continue to provide certain services to you. If you choose to withdraw your consent we will tell you more about the possible consequences.

### WHERE IS YOUR PERSONAL DATA STORED?

All the personal data we process is processed by our staff in the UK. For the purposes of IT hosting and maintenance of the Website and the Platform, this information is located on servers within the European Economic Area. We will not share your personal data outside the European Union unless it is a transfer to a country which is recognised as providing an adequate level of legal protection or by ensuring that



transfers are protected by contractual commitments for additional security - for example, the EU - U.S. Privacy Shield for the protection of personal data transferred to the US. In those cases you will have the right to ask us for more information about the safeguards we have put in place as mentioned above (e.g. to request a copy where the safeguard is documented, which may be redacted to ensure confidentiality).

No third parties, other than Ebix and those that you chose to transact with over the Platform, have access to your personal data unless authorised by law, for example a regulatory body. We take all reasonable steps to ensure that your personal data is processed securely.

### HOW LONG DO WE KEEP IT?

In relation to your [contact details](#), we will retain your data for so long as is instructed by the relevant controller. In some circumstances we may retain your personal data for longer periods of time, for example where we are required to do so to meet legal, regulatory, tax or accounting requirements, in particular where it forms part of an audit trail created to record your use of the Platform.

For the [device data](#) we will retain your personal data for as long as is reasonably necessary for the purposes listed in this notice, and in line with our cookie settings for example.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a possibility of legal action relating to your personal data or dealings.

### WHAT ARE YOUR RIGHTS?

You have a number of rights in relation to your personal data which should be exercised by contacting the User who is the 'controller' of this data (e.g. your employer). In summary, you may request the User to ensure you can [access](#) your data, request the [rectification](#) of any mistakes relating to your data, request the [erasure](#) of records which are no longer required, request the [restriction](#) on the processing of your data, [object](#) to the processing of your data, or request to exercise your right of [data portability](#). You also have various rights in relation to any [automated decision making and profiling](#), however we do not carry out these activities in connection with the Platform or the Website.

### CONTACT AND COMPLAINTS

You can contact us with any queries or concerns at the following [PPLComplaints@placingplatformlimited.com](mailto:PPLComplaints@placingplatformlimited.com).

If you have a complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with your national data protection supervisory authority at any time. In the UK, the supervisory authority for data protection is the ICO (<https://ico.org.uk/>). We do ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.