

## Echelon Claims Consultants Fair Processing Notice

### Overview of Echelon's Commitments to Privacy

At Echelon Claims Consultants, a trading name of JLT Specialty Limited ("we", "us", "our"), we may collect and use information which may identify individuals ("personal data"), including [Insured Persons](#) or [Claimants](#) ("you", "your"). We understand our responsibilities to handle personal data with care, to keep it secure and to comply with applicable data protection laws.

The purpose of this Fair Processing Notice ("Notice") is to provide a clear explanation of when, why and how we collect and use the personal data. We have designed it to be as user friendly as possible, and have labelled sections to make it easy for you to navigate to the information that may be most relevant to you and to allow you to click on a topic to find out more.

Do read this Notice with care. It provides important information about how we use personal data and explains your legal rights. This Notice is not intended to override the terms of any agreements, insurance policies or any right that are available under applicable data protection laws.

We may amend this Fair Processing 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. Please regularly check this Notice for updates.

### 1. Who is responsible for looking after your personal data?

Jardine Lloyd Thompson Group plc ("JLT Group") is a group of companies, which includes Echelon Claims Consultants a trading name of JLT Specialty Limited ("Echelon") who will be your [Controller](#) in respect of your personal data, whether your information is provided to us or we collect it directly from you, and we process it for the purposes described in this Notice.

### 2. What personal data do we collect?

We may collect, use, store and transfer the following personal data:

- Contact Details which includes names, addresses, email addresses and telephone numbers

Please note that we do not collect any [Special Categories of Data](#) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We also do not collect any information about criminal convictions and offences.

### 3. How do we use your personal data?

We will only use information for the following purposes:

- where we are performing a contractual obligation;
- where we are required to comply with a legal or regulatory obligation or requirement; and

- where it is necessary for our legitimate interests (or those of a third party) and the interests and fundamental rights of the data subjects do not override those interests.

We have set out below a description of the ways in which we may use your personal data and which of the legal bases we rely on to do so.

Activity	Type of information collected	The basis on which we may use the information
To perform claims consultancy services and provide claims advice on complex insurance claims	Contact Details	To perform our contractual obligation
		To comply with a legal or regulatory requirement
		Legitimate interest (for the provision of consultancy services)

#### 4. How is personal data collected?

We may collect data from and about an individual from the company who engages us to provide our claims consultancy services.

#### 5. Who do we share your personal data with?

We may share your Contact Details data with other [JLT Group](#) entities for the purposes of providing services to our clients and such services may include general back office and administration support and services.

We work with many third parties, to help manage our business and deliver services. These third parties may from time to time need to have access to your personal data.

- Service Providers, who help manage our IT and back office systems and processes,
- our regulators, which may include the [FCA](#) and [ICO](#) as well as other regulators and law enforcement agencies in the EU and around the world,
- credit reference agencies and organisations working to prevent fraud in financial services, and
- solicitors and other professional services firms.

We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other [Insurers](#). Also, if we were to sell part of our businesses we would need to transfer your personal data to the purchaser of such businesses.

#### 6. International Transfers

From time to time, we may need to share your personal data with other affiliate companies of the Jardine Lloyd Thompson Group plc, [Insurers](#), [Reinsurers](#), our [Service Providers](#) or [Assistance Providers](#), who may be located outside the UK. We will always take steps to ensure that any International Transfer of information is carefully managed to protect your rights and interests:

- we will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection, or
- transfers within the affiliate companies of [JLT Group](#) will be covered by the Standard Contractual Clauses or an intra-group agreement which gives specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within the [JLT Group](#), or
- transfers to third parties outside the UK are protected by contractual commitments such as signing the Standard Contractual Clauses with them or where appropriate further assurances, such as certification schemes.

You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us as set out in Section 10 if you would like further information or to request a copy where the safeguard is documented (which may be redacted to ensure confidentiality).

## 7. Data analytics

We routinely analyse information in our various systems and databases to help improve the way we run our business, to provide a better service and to enhance the accuracy of our risk models. We take steps to protect privacy by aggregating and where appropriate anonymising data fields (particularly in relation to policy information and claim details) before allowing information to be available for analysis.

## 8. How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes listed in Section **Error! Reference source not found.** of this Notice. In some circumstances, we may retain your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax or accounting requirements.

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 prospect of litigation relating to your personal data or dealings.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required, we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

## 9. What are your data subjects' rights?

You have a number of rights in relation to your personal data.

Where you are a data subject, you may request [access](#) to your data, correction or [rectification](#) of any mistakes in our files, [erasure](#) of records where no longer required, [restriction](#) on the processing of your data, [objection](#) to the processing of your data, data [portability](#) and various information in relation to any [Automated Decision Making](#) and [Profiling](#) or the basis for [International Transfers](#). You may also exercise a right to complain to your [Supervisory Authority](#). These are set out in more detail as follows:

RIGHT	WHAT THIS MEANS
Access	<p>You can ask us to:</p> <ul style="list-style-type: none"> <li>confirm whether we are processing your personal data,</li> <li>give you a copy of that data,</li> <li>provide you with other information about your personal data such as what data we have, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or <a href="#">Profiling</a>, to the extent that information has not already been provided to you in this Notice.</li> </ul>
Rectification	<p>You can ask us to rectify inaccurate personal data. We may seek to verify the accuracy of the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none"> <li>it is no longer needed for the purposes for which it was collected, or</li> <li>you have withdrawn your consent (where the data processing was based on consent), or</li> <li>following a successful right to object (see '<a href="#">Objection</a>' below), or</li> <li>it has been processed unlawfully, or</li> <li>to comply with a legal obligation to which JLT Specialty is subject.</li> </ul> <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary:</p> <ul style="list-style-type: none"> <li>for compliance with a legal obligation, or</li> <li>for the establishment, exercise or defence of legal claims.</li> </ul> <p>There are certain other circumstances in which we are not required to comply with your <a href="#">erasure</a> request, although these two are the most likely circumstances where we would deny that request.</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none"> <li>its accuracy is contested (see Rectification), to allow us to verify its accuracy, or</li> <li>the processing is unlawful, but you do not want it erased, or</li> <li>it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims, or</li> <li>you have exercised the right to object, and verification of overriding grounds is pending.</li> </ul> <p>We can continue to use your personal data following a request for <a href="#">restriction</a>, where:</p> <ul style="list-style-type: none"> <li>we have your consent (for example to process a claim), or</li> <li>to establish, exercise or defend legal claims, or</li> <li>to protect the rights of another natural or legal person, or</li> <li>to comply with a legal obligations to which JLT Specialty is subject..</li> </ul>
Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another <a href="#">Controller</a>, but in each case only where:</p> <ul style="list-style-type: none"> <li>the processing is based on your consent or the performance of a contract with you; and</li> <li>the processing is carried out by automated means.</li> </ul>

RIGHT	WHAT THIS MEANS
International Transfers	You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred to another jurisdiction outside of the UK. We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.
Supervisory Authority	You have a right to lodge a complaint with your local <a href="#">Supervisory Authority</a> about our processing of your personal data. In the UK, the <a href="#">Supervisory Authority</a> for data protection is the <a href="https://ico.org.uk/">ICO (https://ico.org.uk/)</a> . We do ask that you please attempt to resolve any issues with us first, although you have a right to contact your <a href="#">Supervisory Authority</a> at any time.
Objection	You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis (see Section 3), if you believe your fundamental rights and freedoms outweigh our legitimate interests.  Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

To exercise your rights you may contact us as set out in Section 10. Please note the following if you do wish to exercise these rights:

- **Identity.** We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request.
- **Fees.** We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for [access](#) to information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.
- **Timescales.** We aim to respond to any valid requests within one (1) month unless it is particularly complicated or you have made several requests, in which case we aim to respond within three (3) months. We will let you know if we are going to take longer than one (1) month. We might ask you if you can help by telling us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.
- **Exemptions.** Local laws, including in the UK, provide for additional exemptions, in particular to the right of [access](#), whereby personal data can be withheld from you in certain circumstances, for example where it is subject to legal privilege.
- **Third Party Rights.** We do not have to comply with a request where it would adversely affect the rights and freedoms of other data subjects.

## 10. Contact and complaints

The primary point of contact for all issues arising from this Notice, including requests to exercise data subject rights, is our Data Protection Officer. The Data Protection Officer can be contacted in the following ways:

Email: [JLTSL\\_UK\\_DPO@JLTGroup.com](mailto:JLTSL_UK_DPO@JLTGroup.com)



Or by Post: Data Protection Officer  
Echelon Claims Consultants  
A trading name of JLT Specialty Limited  
The St Botolph Building  
138 Houndsditch  
London EC3A 7AW

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.

**APPENDIX 1 - GLOSSARY**

**Assistance Providers:** these are a special category of service provider, which we use to help provide you with emergency or other assistance in connection with certain policies.

**Claimant:** a party making a claim under an insurance policy.

**Claims Experts:** these are experts in a particular field which is relevant to a claim, for example medicine, forensic accountancy, mediation or rehabilitation, who are engaged to help us properly assess the merit and value of a claim, provide advice on its settlement, and advise on the proper treatment of [Claimants](#).

**Controller:** means a natural or legal person (which determines the means and purposes of processing of personal data).

**Coverholder:** means a company authorised by [Insurers](#) to enter into a contract or contract of insurance.

**FCA:** the Financial Conduct Authority, which is a financial regulatory body in the UK.

**ICO:** the Information Commissioner's Office regulates the processing of personal data by all organisations within the UK.

**Insured Person:** we use this term to refer to both individual [Policyholders](#), as well as any individual who benefits from insurance coverage under one of our policies (for example, where an employee benefits from coverage taken out by their employer).

**Insurer:** a company that underwrites an insurance risk.

**JLT Group:** Jardine Lloyd Thompson Group plc and in the event that Jardine Lloyd Thompson Group plc is acquired by a purchasing firm, JLT Group shall include all companies within the purchasing firm.

**Loss Adjuster:** these are an independent claims specialist which investigates complex or contentious claims on our behalf.

**Policyholder:** means the original insured, assured, insured and reinsured.

**PRA:** the Prudential Regulation Authority, which is a financial regulatory body in the UK. The [PRA](#) focuses on the prudential regulation of financial services firms. When discharging its general functions, the [PRA](#) is responsible for contributing to the securing of an appropriate degree of protection for [Policyholders](#).

**Profiling:** means using automated processes without human intervention (such as computer programmes) to analyse your personal data in order to evaluate your behaviour or to predict things about you which are relevant in an insurance context, such as your likely risk profile.

**Reinsurer:** an [Insurer](#) who insures the risks of other insurance companies.

**Service Providers:** these are a range of third parties to whom we outsource certain functions of our business or with whom we have engaged to provide certain services. For example, we have service providers who provide/support 'cloud based' IT applications or systems, which means that your personal data will be hosted on their servers, but under our control and direction. We require all our service providers to respect the confidentiality and security of personal data.

**Solicitors:** we frequently use solicitors to advise on complex or contentious claims or to provide us with non-claims related legal advice. In addition, if you are a [Claimant](#) you may be represented by your own solicitor(s).

**Special Categories of Data:** means any personal data relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership.

**Third Party Administrators (or TPAs):** these are companies outside the [JLT Group](#) which administer the underwriting of policies, the handling of claims, or both, on our behalf. We require all TPAs to ensure that your personal data is handled lawfully, and in accordance with this Notice and our instructions.