



Privacy Policy

1. Introduction

1.1 This privacy policy is to let you know how and why we collect and use personal data and provides information about individual's rights about their personal data. Personal data is any information relating to an identified or identifiable living person. We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

2. Who we are

2.1 Talisman Underwriting Plc (**Talisman**) provides services through a number of different subsidiaries focused on the Lloyd's insurance market in London which are corporate members of Lloyd's, which is authorised and regulated by Lloyd's

2.2 Talisman is a 'data controller' which means it decides the purposes and the ways in which any personal data is processed.

2.3 The Data Protection Officer for Talisman Underwriting Plc can be contacted by writing to the address below.

2.4 Talisman is incorporated and registered in England and Wales at the following address:

5th Floor
70 Gracechurch Street
London EC3V 0XL

3. How the law protects you

3.1 Data Protection law (comprising of the Data protection Act 1998, the incoming EU General Data Protection Regulation (GDPR) and UK Data Protection Act 2018) says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Talisman Underwriting Plc. The law says we must have one or more lawful reasons to process your information. The lawful reasons we rely on are:

- When it is our legal or regulatory duty;
- When it is in our legitimate interest; or
- When you consent to it.

3.2 A legitimate interest is when we have a business or commercial reason to use your information. Even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

4. What we use your information for

4.1 Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal data where it is strictly needed for those purposes.

4.2 Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our lawful reasons	Our legitimate interests
Servicing our shareholders		
<ul style="list-style-type: none"> - Managing our relationship with you - Developing and carrying out any marketing activities - Understanding your requirement - Communicating with you 	<ul style="list-style-type: none"> - Your consent - Fulfilling contractual obligations - Our legitimate interests - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Keeping our records up to date, working out which method of investment may interest you - Defining shareholder requirements - Seeking your consent when we need it to contact you - Being efficient about how we fulfil our legal and contractual duties
Business improvement		
<ul style="list-style-type: none"> - To develop new ways to meet our investors needs and to grow our business 	<ul style="list-style-type: none"> - Fulfilling contractual obligations - Our legitimate interest - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Developing ways of investing for the company - Defining types of shareholder - Being efficient about how we fulfil our legal and contractual duties
Managing our operations		
<ul style="list-style-type: none"> - To manage the business and provide services to shareholders - To make and manage payments - To manage share transfers - To collect and recover money that is owed to us in the normal course of business 	<ul style="list-style-type: none"> - Fulfilling contractual obligations - Our legitimate interest - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Being efficient about how we fulfil our legal and contractual duties - Complying with rules and guidance from regulators
Managing security, risk and crime prevention		
<ul style="list-style-type: none"> - To detect, investigate, report, and seek to prevent financial crime - To manage risk to us and our customers - To obey laws and regulations that apply to us - To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> - Fulfilling contractual obligations - Our legitimate interest - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect - Complying with rules and guidance from regulators - Being efficient about how we fulfil our legal and contractual duties
Business management		
<ul style="list-style-type: none"> - To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit 	<ul style="list-style-type: none"> - Our legitimate interests - Our legal duty - Fulfilling contractual obligations 	<ul style="list-style-type: none"> - Complying with rules and guidance from regulators - Being efficient about how we fulfil our legal and contractual duties

- To exercise our rights set out in agreements or contracts		
For processing special categories of personal data		
- Substantial public interest	- Using criminal records data to help prevent, detect, and prosecute unlawful acts and fraudulent behaviour	
- Responding to regulatory requirements	- Passing information to the regulator as needed to allow investigation into whether we have acted in the right way	
- Legal claims	- Using any special categories of data as needed to establish, exercise or defend legal claims	
- Consent	- Telling you that we need your consent to process special categories of personal data	

5. Groups of Personal Information

5.1 The below table explains what all the different types of personal information mean that are covered by data protection law.

5.2 We use many different kinds of personal information. The categories are all listed here so that you can see what we may know about you. The principle purpose is in, the provision of services to you. Some of the data are private and sensitive and we treat it that way.

Types/categories of personal information	Description
Contact information	Your name, address, email address, telephone numbers
Financial	Your financial position, status and history
Socio-demographic	This includes details about your work or profession, nationality and where you fit into general social or income groupings
Transactional	Details about payments relating to the normal course of business activities
Contractual	Details about the services we provide to you
Behavioral	Details about why you invest, and risk appetite
Communications	What we learn about you from letters and emails you write to us and conversations between us
Social Relationships	Your family and other relationships
Open Data and Public Records	Details about you that are in public records, such as Companies House, and other information about you that is openly available on the internet
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things such as your passport, driver's license, utility bills, or bank statements
Special types of data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if there is a legal basis which allows us to do so: <ul style="list-style-type: none"> - Health data - Criminal records of convictions and offences
Consents	Any permissions, consents or preferences that you give us.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number or Tax Identification Number

6. Where we collect personal information from

6.1 If you intend to give us information on behalf of someone else you must ensure that they have been provided with this Privacy Policy before doing so.

6.1.1 Data you give to us:

- When you apply to invest in the company
- When you talk to us on the phone or in meetings
- In emails and letter

6.2 Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Fraud prevention agencies
- Public information sources such as Companies House

7. Who we share your personal information with

7.1 We may share your personal information with outside organisations such as Lloyd's, or tax authorities. This is so that we can run our business, and obey rules that apply to us. Here we list all the types of organisation that we may share your personal information with.

7.1.1 Argenta Group - We may share your information with companies within the Argenta Group as Argenta Private Capital are member's agents to Talisman.

7.1.2 Authorities - This means official bodies that include:

- Central and local government
- HM Revenue & Customs, regulators and other tax authorities
- Law enforcement and fraud prevention agencies

7.1.3 Banking & Financial Services - Outside companies we work with to provide services to you and to run our business

- Agents, sub-contractors and advisers (these are types of firm that we use to help us run Talisman)
- Someone linked with you (this could mean a joint account holder or trustee)
- Other financial services companies (to help prevent, detect and prosecute unlawful acts and fraudulent behaviour)
- Independent Financial Advisers (this could be someone who advises you on things like tax. We won't share any personal information unless they have your consent to ask us for it)

8. Fraud Prevention Agencies (FPAs)

8.1 We may need to confirm your identity before you invest. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We use FPAs to help us with this.

8.2 Both we and FPAs can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'. A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

8.3 We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering

9. The information we use

9.1 These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Employment details

10. Marketing

10.1 We do not sell or give your data to other companies for marketing purposes.

11. How long we keep your personal information

11.1 Your personal data will not be kept for longer than is necessary and for the purpose or purposes for which the personal data are processed. We will keep your personal information for the duration of your relationship with Talisman and any subsequent limitations period that apply.

11.2 After you stop being an investor and all transactions (including reporting) have ceased, we may keep your data for up to 12 years for one or more of these reasons:

- To respond to any questions or complaints
- To maintain records according to rules that apply to us

11.3 We may keep your data for longer than 12 years if we cannot delete it for legal, regulatory or technical reasons.

12. Security precautions in place about data collected

12.1 When you give us personal information, we take steps to make sure that it's treated securely. Any sensitive information is kept secure in access controlled areas and is encrypted when being transmitted to third parties for the purpose of fulfilling our obligations to you.

13. Your individual rights over personal information

13.1 Your individual rights can be exercised by contacting us by post or phone using the contact details provided. We will need to confirm your identity before processing a request. If you are unable to provide satisfactory proof of your identity we have the right to refuse a request.

13.1.1 Right to access a copy of your personal information

You can request a copy of the personal information that we hold about you, free of charge. This is generally known as a 'Subject Access Request' and we normally have one month to respond.

If you would like a copy of some or all your personal information, please email or write to us at the following address: Talisman Underwriting Plc, 5th Floor, 70 Gracechurch Street, London EC3V 0XL.

13.1.2 Right to request rectification of your personal information

We take reasonable steps to keep your information accurate, complete and current but you can also ask us to change any information we hold about you to ensure that this is the case. However, please remember that it is your responsibility to tell us about any updates to this information.

13.1.3 Right to request erasure of your personal information

In certain circumstances, you have the right to ask us to erase the personal information we hold about you. Where there are legitimate reasons that we must retain some of your personal information after you have requested its erasure, appropriate organisational and technical controls will remain in place.

13.1.4 Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel there are adequate grounds relating to your particular situation. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

13.1.5 Right to request restriction on our processing of your personal information

You can request that we restrict our processing of your personal information where:

- you contest the accuracy of the information we hold (restricted until it has been verified);
- it was processed unlawfully and you wish to restrict our processing, as opposed to requesting its erasure; or

Where a restriction is in place we can continue to store your information but only process it with your consent.

13.1.6 Data Portability

In certain circumstances, where technically feasible, you have the right to receive personal information in a structured, commonly used and machine-readable format and have the right to transmit such personal information to another data controller, if the processing is based on consent and is carried out by automated means.



14. How to exercise your rights

Should you like to make a request relating to your personal information rights as detailed above please contact us via

Post: Data Protection Officer, Talisman Underwriting Plc, 5th Floor, 70 Gracechurch Street, London EC3V 0XL

15. Right to withdraw consent for optional processing

You may at any time withdraw consent for any optional uses of your information to which you have previously consented.

16. Other websites

Our website contains links to other websites. This privacy policy only applies to Talisman so when you link to other websites you should read their own privacy policies.

17. Complaints

If you feel that your personal data has been processed in a way that does not meet the applicable requirements under the relevant data protection laws, you have a specific right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO can be contacted via their website (ico.org.uk).

18. Changes to our Privacy Policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 22nd May 2018.