LOCKTON INDIA INSURANCE BROKING AND ADVISORY PVT LTD

Data protection Notice for Customers.

May 2026

DATA PROTECTION NOTICE FOR CUSTOMERS

This Data Protection Notice sets out the basis which Lockton India Insurance Broking and Advisory Private Limited. We may collect, use, disclose or otherwise process personal data of our customers in accordance with the Digital Personal Data Protection Act ("DPDPA"). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Definitions:

Data Principles: Data Principal is defined as the individual to whom the personal data relates.
Data Fiduciary: Data Fiduciary is defined as any person (including an individual, company, or entity) who, alone or in conjunction with others, determines the purpose and means of processing personal data.
Personal Data: "Personal data" means any data about an individual who is identifiable by or in relation to such data.
Processing means any action performed on Personal Data using digital systems. This includes collecting, recording, organizing, storing, using, retrieving, sharing, updating, restricting, deleting, or destroying Personal Data.

Personal Data We Collect

We may collect personal data that is necessary for the business activities. We follow the Data Minimisation and purpose Limitation principles.

A. Identification & Contact Information

- Full name
- Date of birth
- Gender
- PAN/Aadhaar (where legally required)
- Passport details (if relevant to insurance placement)
- Address, phone number, email

B. Insurance & Financial Information

- Policy details
- Claims history
- Financial and banking details (where required for transactions)

C. Sensitive Personal Data (as applicable)

While the DPDPA does not separately define "sensitive personal data," we may process health or medical information strictly for insurance underwriting or claims support, with your explicit consent.

D. Technical & Digital Information

- IP address
- Device information
- Cookies and browsing data (for website users)

We collect personal data either:

- Directly from you.
- From your employer (for group insurance);
- From insurers, reinsurers, TPAs, or business partners.

Purpose of Processing:

Lockton India Insurance Broking and Advisory Private Limited ("Lockton India") processes personal data only for lawful purposes in accordance with the Digital Personal Data Protection Act, 2023 (DPDPA).

We process personal data for the following purposes:

- **Insurance Broking & Advisory Services** – To provide advice on insurance products, recommend suitable policies, and facilitate policy purchase.
- **Claims Handling & Support** – To process, manage, and support insurance claims, including verification and coordination with insurers.
- **Digital Platform Operations** – To operate and maintain our digital platforms, ensuring secure access and smooth functionality.
- **Customer Relationship Management** – To manage client interactions, address inquiries, resolve issues, and maintain accurate customer records.
- **Regulatory & Legal Compliance** – To comply with applicable laws, regulations, and reporting obligations.
- **Fraud Prevention & Security** – To detect, prevent, and mitigate fraudulent or unauthorized activities, protecting data and organizational assets.
- **Analytics & Service Improvement** – To analyse data for trends, service performance, and improvement of customer experience.
- **Communication & Updates** – To send important notifications, service updates, and other relevant communications.
- **Employment & Group Insurance Administration** – To manage employee and group insurance plans, including enrolment, coverage, and benefits processing.
- **Legal Protection & Business Operations** – To safeguard our legal interests, manage risks, enforce contracts, and ensure operational continuity.
- **Business Continuity, Internal Governance, and Audit Functions** – To support internal governance, auditing, risk management, and business continuity measures.

We process personal data based on:

- The Data Principal's consent; or
- Legitimate uses permitted under the DPDPA (including compliance with law, employment-related purposes, medical emergencies, and other lawful grounds).

We do not process personal data for purposes incompatible with those stated above without obtaining fresh consent where required under applicable law.

We may disclose your personal data to:

- Our affiliates, service providers, or partners for operational purposes
- Regulatory authorities, law enforcement, or other government bodies as required by law
- Third parties in the context of corporate restructuring or business transfers

Data Principal Rights:

1. **The Right of Access Information about Personal Data (aka a DSAR):** Individuals have a right of access to information about Personal Data held by Lockton as a Data Fiduciary and right to be informed about the purpose or purposes for which Lockton intends to process that personal data.
2. **The Right to Correction and erasure of personal Data**: Individuals have a right to correction, completion, updating and erasure of her personal data for the processing of which Data Principal has previously given consent.
3. **The Right to Withdraw the consent (aka an opt out):** Individuals haves the right to ask to Lockton to stop processing their Personal Data
4. **The Rights of Grievance redressal:** Individuals can raise the grievance request to Data Fiduciary or Consent manager in respect of any act or omission of such Data Fiduciary or Consent Manager regarding the performance of its obligations in relation to the personal data before approaching the Data Protection Board.
5. **The Right to Nominate:** Data Principal can nominate any other individual, who shall, in the event of death or incapacity of the Data Principal, exercise the rights of the Data Principal

Data Retention:

We retain your personal data only as long as necessary to fulfil the purposes described in this notice or as required by law.
If you request deletion of your personal data, we will take all reasonable steps to erase it from our records, unless we are legally required or have a legitimate business reason to retain it.

Cross-Border Data Transfers

We do not currently transfer your personal data outside India. If such transfers occur in the future, we will ensure appropriate safeguards.

Protection of personal data

We take the protection of your personal data seriously and implement robust administrative, technical, and physical security measures to safeguard it against unauthorized access, disclosure, alteration, or loss. Our security practices include secure storage, access controls, encryption, regular monitoring, and staff training to ensure that your personal data is handled safely.
We continuously review and update our security measures to address emerging risks and maintain the confidentiality, integrity, and availability of your personal data.

Data Breach Notification

In the event of a data breach involving your personal data, we will notify you and the relevant authorities in accordance with the DPDP Act.

To exercise your rights, contact:

Data Protection Officer,
802, 8th Floor, Tower A, Peninsula Business Park,
Lower Parel, Mumbai 400013.
dpo.India@lockton.com

Updates to this Notice

We may update this notice from time to time to reflect changes in our practices or legal requirements. Any updates will be posted on our website with the effective date, ensuring you are always informed about how we handle your personal data.

Effective Data: 25-05-2026
Last Updated: 25-05-2026