

Privacy statement

Introduction

This privacy statement describes why and how PricewaterhouseCoopers Business Services Limited (“PwC”, “we”, “us”, or “our”) collects and uses personal data in connection with our handling of your claim (“process”) and provides information about your rights as a user of the process (“you”, “user” or “individual”).

Personal data is any information relating to an identified or identifiable person. This privacy statement applies to personal data provided to us, both by you or by others and any personal data created in connection with your use of the process. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data. To find out more about our specific processing activities in connection with the process, please go to the relevant sections of this statement.

Security

We adhere to internationally recognised security standards. Our information security management system relating to client confidential data is aligned to the requirements of ISO/IEC 27001: 2013. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure:

- Encryption & password protection for sending/receiving emails containing sensitive information.
- Where sensitive information has to be sent via post, this will be done through recorded delivery.
- Claimants and other beneficiaries’ personal & sensitive information will be stored securely, restricting access to only those that require it.
- Data will only be accessed by those that require it and process for the purposes intended (as noted in the following sections).

Changes to this privacy statement

We recognise that transparency is an ongoing responsibility so we will keep this privacy statement under regular review. The current version has been updated on the 6th August 2024.

Data controller and contact information

The data controllers are:

- PricewaterhouseCoopers Business Services Limited (which is registered in England under registration no. 12886828 and with its registration address at 1 Embankment Place, London, WC2N 6RH)

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Data Protection Officer
PricewaterhouseCoopers LLP
1 Embankment Place
London
WC2N 6RH

Email: UK_privacy@pwc.com

Collection of personal data

We will collect personal data in connection with the process as described below.

Personal data provided directly by you or your representatives acting on your behalf:

- Personal details (e.g. name, address, date of birth)
- Financial details (e.g. National Insurance number, tax details)
- Health information (e.g. GP and hospital records including an individual's NHS number, medical reports prepared in connection with the claim)
- Employment details (e.g. employment records, occupational health records, HMRC record of employment etc.)
- Family Dependents and other beneficiaries who may be party to the claim (e.g. name, address, date of birth)

Personal data obtained from third party sources:

- Where a previous entity was handling your claim, we would have obtained your personal data from that entity
- When dealing with employment liability claims, we consult with the Ministry of Justice and the Employers Liability Tracing Office
- We communicate with your/claimants Appointed Representatives, Solicitors and Barristers, acting on behalf your/claimants' behalf, in order to progress your claims

Use of personal data

We use personal data for the following purposes:

- **Provide claims management and administration services** - Personal data is processed for the purpose of ensuring that claims are being administered and assessed with the view that claimants receive the correct remuneration.
Legal grounds: Legitimate interests
This processing of personal data by us is necessary for the purposes of the legitimate interests pursued by us in providing professional services, our client in receiving professional services to ensure the claims continue to be administered and in the claimants' legitimate interest to ensure that compensation is received. Where we process special categories of personal data, we rely on a relevant substantial public interest condition under Schedule 1 of the Data Protection Act 2018.

- **Administering and managing our businesses and services** - We may process personal data in order to run our business, managing our relationship with our clients, their representatives and other insurance companies involved in the usual claims management processing, developing our businesses and services (such as identifying client needs and improvements in service delivery), administering, managing and maintaining our systems and the applications.

Legal grounds: Legitimate interests

The processing of the personal data relating to business contacts to administer, manage and develop our business and services is in the legitimate interests of PwC and other PwC member firms.

- **Security, quality and risk management activities** - We have security measures in place to protect our information, our clients' information and information provided by you (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful messages. We monitor the services provided for quality purposes, which may involve processing personal data stored.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of our services.

- **Complying with any requirement of law, regulation or a professional body of which we are a member** - Where we process personal data to comply with a requirement of law or regulation, our lawful basis for processing is necessary to comply with a legal obligation.

Legal grounds: Legal obligation or legitimate interests

This processing is necessary for us to comply with a legal obligation; for example, when conducting customer due diligence checks to comply with anti-money laundering regulations and, where we do not have a legal obligation, we have a legitimate interest in processing personal data as necessary to meet our regulatory or professional obligations.

When and how we share personal data and locations of processing

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

We are part of a global network of firms and in common with other professional service providers, we use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the United Kingdom. We will do so only where we have a lawful basis, for example to recipients: (i) in countries which provide an adequate level of protection for personal data; or (ii) if adequacy is not available, under agreements which meet UK and/or European Commission Decision 2021/914 requirements for those transfers, as appropriate.

We share personal data processed in connection with the process as follows:

- Administering Scheme of Arrangements. Data is provided to us for the purposes of arranging the processing of payments from the Financial Services Compensation Scheme
- External Policyholders and their appointed insurance brokers
- Financial Services Compensation Scheme acting as a compensator and auditor
- Solicitor / Barrister appointed on behalf of the Policyholder/Defendant

- Co-Insurers of the claims management services Policyholder and their legal representatives
- Co-Defendants in your legal action and their legal representatives
- Medical or other experts appointed in connection with the claim
- Fraud prevention agencies where necessary

Where the locations of processing are outside of the UK or EEA, we have the Standard Contractual Clauses, as amended by the IDTA, to provide appropriate safeguards for personal data transferred outside of the UK or EEA.

Personal data held by us may be transferred to other member firms:

- For details of our territory member firm locations, please [click here](#).
- For details of our other member firm locations please [click here](#)
- We may share personal data with other PwC member firms where necessary for administrative purposes, to provide professional services to our clients (for example when providing services involving advice from PwC member firms in different countries), and to develop new PwC technologies and services across the PwC network of member firms.
- We use other PwC member firms as IT service providers for the operation, maintenance and care of the IT systems and applications used by us.
- We store personal data on other PwC member firm servers in the EU
- Our business contacts are visible to and used by other PwC member firms to learn more about a contact, client or opportunity they have an interest in (please see the [Business contacts](#) section of this privacy statement for more information about our processing of this type of data).

Other third parties used to host or obtain support for managing the claims are:

For the purpose of processing your claims, the third parties we share data with are listed below. In addition, being a part of a global network of firms, similar with other professional service providers, we use third parties to help us run our business. The third parties we share information with are outlined below:

Name	Role	Address
Appian Software International LLC	Hosting the data in their Amazon Web Service Inc cloud platform and providing support	Baarerstrasse 21, 6300 Zug, Switzerland
Iron Mountain Incorporated	providing file storage & management services.	Hoddesdon - Unit B, Ratty's Lane, Enfield, EN11 0RF Warrington - Grand Central @ The Big Apple, Stretton Green Distribution Park, Langford Way, Appleton, Warrington WA4 4TQ
BT PLC	will be providing communications services	81 Newgate Street, London EC1A 7AJ, UK
Google Ireland Limited	will provide business applications such as email, documents and calendar	Gordon House, Barrow Street, Dublin 4, Dublin, D04 E5W5 Data centres located in a number of locations around the world (EU, Chile, Singapore, Taiwan, USA)

BC Legal Ltd	Host the ABC2 Noise-Induced Hearing Loss assessment against medical evidence supplied by claimants.	BC Legal Ltd ,Avenue HQ, 10-12 East Parade, Leeds LS1 2BH
Microsoft Limited	providing business applications where appropriate	Microsoft Campus, Thames Valley Park, Reading, RG6 1WG, UK
Tata Consultancy Services (“TCS”)	Provides PwC with Business Process Outsourcing services, primarily IT support for PwC applications	Mumbai, Maharashtra, India
OpenAI	Large Language Model (LLM) to support and automate services	548 Market Street, PMB 97273 San Francisco, California 94104

During the provision of our services, we might have to share personal data with auditors and other professional advisers, in order to comply with our professional and regulatory obligations. Some auditors might be acting on behalf of the policyholders & creditors to assess the claims service.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as law enforcement or other government or regulatory agencies and independent industry bodies, in order to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation and we will ensure that your data remains confidential in these instances.

Data retention

We retain personal data processed in connection with the process as follows:

- Employment Liability Insurance Information - 60 years
- Summary Claims Information* - 60 years
- Claims Information - 7 years from the point of settlement or until recovery action / subrogation has concluded.

* Skeleton information is defined as:

- Personal details (e.g. name, address, date of birth)
- Settlement amount
- Brief details of incident
- Nature of the injury / disease claimed for
- Date of incident
- Insurer details
- Date of relevant insurance period

Individuals' rights and how to exercise them

You have certain rights over your personal data. Data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller.

Individuals' rights are the right of access to personal data, to rectification of personal data, to erasure of personal data / right to be forgotten, to restrict processing of personal data, to object to processing of personal data, to data portability, the right to withdraw consent at any time (where processing is based on consent) and the right to lodge a complaint with a supervisory authority.

Please see further information about these rights and how to exercise them below.

Right of access

You have the right to obtain confirmation as to whether we process personal data about you, receive a copy of your personal data held by us as a data controller and obtain certain other information about how and why we process your personal data (similar to the information provided in this privacy statement).

You may exercise this right by emailing us at UK_privacy@pwc.com. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits.

Right to rectification

You have the right to request for your personal data to be amended or rectified where it is inaccurate (for example, if you change your name or address) and to have incomplete personal data completed.

To update personal data submitted to us, please email us at UK_privacy@pwc.com. When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make updates, as appropriate, based on your updated information.

The right to erasure / right to be forgotten

You have the right to obtain deletion of your personal data in the following cases:

- the personal data are no longer necessary in relation to the purposes for which they were collected and processed;
- our lawful basis for processing is consent, you withdraw consent and we have no other lawful basis for the processing;
- our lawful basis for processing is that the processing is necessary for a legitimate interest pursued by us, you object to our processing and we do not have overriding legitimate grounds;
- you object to our processing for direct marketing purposes;
- your personal data have been unlawfully processed; and
- your personal data must be erased to comply with a legal obligation to which we are subject.

To request deletion of your personal data, please email us at UK_privacy@pwc.com.

The right to restrict processing

You have the right to restrict our processing of your personal data in the following cases:

- for a period enabling us to verify the accuracy of the personal data where you have contested the accuracy of the personal data
- your personal data have been unlawfully processed and you request restriction of processing instead of deletion;
- the personal data are no longer necessary in relation to the purposes for which they were collected and processed but the personal data are required by you to establish, exercise or defend legal claims; and
- for a period enabling us to verify whether the legitimate grounds relied on by us override your interests (where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us).

To restrict our processing of your personal data, please email us at UK_privacy@pwc.com.

The right to object to processing

You have the right to object to our processing of your personal data in the following cases:

- our lawful basis for processing is that the processing is necessary for a legitimate interest pursued by us; and
- our processing for direct marketing purposes.

To object to our processing of your personal data, please email us at UK_privacy@pwc.com.

Right to data portability

You have a right to receive your personal data provided to us and have the right to send the data to another organisation (or ask us to do so if technically feasible) where our lawful basis for processing the personal data is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.

To exercise your right to data portability, please email us at UK_privacy@pwc.com.

Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to UK_privacy@pwc.com. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred within the EU. The Information Commissioner's Office ("ICO") is the UK data protection regulator/supervisory authority. For further information on your rights and how to complain to the ICO, please refer to the [ICO website](https://ico.org.uk).