

Corporate Treasury Team

The City of London Corporation is committed to protecting and respecting your personal data. This Privacy Notice explains how we use information about you and how we protect your privacy in connection with insurance, VAT, investments, pension funds account, treasury management, cashiers, and banking matters. For full details on how the City of London Corporation processes personal information more generally, please visit www.cityoflondon.gov.uk/privacy

If you have any concerns or questions about how we look after your personal information, please contact the City of London's Data Protection Officer, also the Comptroller and City Solicitor, Michael Cogher, at information.officer@cityoflondon.gov.uk.

Please note - this Privacy Notice was updated on : 8 June 2026

Departments this notice applies to personal data held by: Chamberlain's Department

1. Your personal data

Personal data is anything that directly or indirectly identifies and relates to a living person, such as a name, address, telephone number, date of birth, your gender, age, how the application was made etc.

All personal data collected will be evaluated periodically and only kept as long as necessary or in line with legal requirements.

We collect information about you as provided to us

- Name
- Contact details
- Date of Birth
- National Insurance number
- Photographs
- CCTV footage
- Employment records
- Education records
- Lifestyle/social circumstances
- Financial data – pay records, bank account details

In addition to this some information is considered 'special category data and needs more protection due to its sensitivity. This includes any information about an identifiable individual that can reveal their sexuality and sexual health, religious or philosophical beliefs, racial origin, ethnicity, physical or mental health, trade union membership, political

opinion, genetic/biometric data.

We may also collect, store and use the following “special category data” which is of a more sensitive nature:

- Health data – medical records
- Racial or Ethnic origin
- Criminal convictions

2. Why do we need your personal data?

We will collect and process the above data about you:

- To administer the processing of claims received by the City of London Corporation.
- To undertake investigations and risk management surveys.
- To administer loans and the repayment of the loans
- To process payments
- To administer and process bursary payments
- To administer the payment of rent and service charges, licensing and street trading, social care client care services.
- To undertake financial assessments and credit card checks

3. How the law allows us to use your personal data.

There are several legal reasons why we will need to collect and use your personal data in different circumstances.

Generally, we collect and use personal data where:

- Consent
- Necessary for the performance of a contract
- Necessary for compliance with a legal obligation
- Necessary for a task carried out in the public interest or in the exercise of official authority

4. Consent

If we have consent to use your and your guest(s) personal data for any particular reason, you both have the right to remove your consent at any time. If you want to remove your consent, please contact information.officer@cityoflondon.gov.uk and tell us about the personal data being used and where it is

being used or the department using this data, so we can respond to your request.

5. Your rights regarding your personal data

The law gives you a number of rights in relation to what personal data is used by the City of London, and how it is used. These rights are listed below, and full details can be found in the [City of London's Data Subject Rights Policy](#).

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at information.officer@cityoflondon.gov.uk

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

You can ask us to:

- provide you with a copy of the personal data that we hold about you;
- correct personal data about you which you think is inaccurate;
- delete personal data about you if you think we no longer should be using it;
- stop using your personal data if you think it is wrong, until it is corrected;
- transfer your personal data to another provider in a commonly used format;
- not use automated decision-making processes to make decisions about you.

6. Who do we share your personal data with?

In some circumstances, we use other organisations to either store personal data or use it to help deliver our services to you. Where we have these arrangements, there is always an agreement in place to make sure that the organisation complies with data protection law.

Please note that we will also share your data with the Livery Companies – but only in instances where the applicant of the Freedom is a member of that company.

Sometimes we have a legal duty to provide personal data to other organisations.

We may also share your personal data when we consider/believe that there is a good reason to do so, which is more important than protecting your privacy. This doesn't happen often, but in these circumstances, we may share your personal data:

- to find and stop crime and fraud; or

- if there are serious risks to the public, our staff or to other professionals; or
- to protect a child; or
- to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them.

For all these reasons, the risk must be serious before we can override your right to privacy.

If we are worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we will discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

We may still share your personal data if we believe the risk to others is serious enough to do so.

If this is the case, we will make sure that we record what personal data we share and our reasons for doing so. We will let you know what we have done and why, if we think it is safe to do so.

Personal data may be shared with the following parties:

- Insurers, external claims-handling agents, loss adjusters
- Legal advisers
- Insurance brokers,
- National Fraud Initiative
- Internal departments.
- City of London Police
- Courts
- Internal and external auditors.

7. How do we protect your personal data.

We have a legal duty to make sure we hold your personal data (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that personal data is hidden so that it cannot be read without special knowledge (such as a password).
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal data from getting access to it
- Training for our staff allows us to make them aware of how to handle personal data, and how and when to report when something goes wrong

You can find more details of our Information Security expectations in our IT Security Policy.

8. Where we store your personal data

The data that we collect from you will be held within the UK unless we are required to process your data outside of the UK. For example, if the Freedom Certificate needs to be sent to an address based outside of the UK.

All data held and processed within the UK will be processed by staff who work for us or for one of our providers.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps that are reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of personal data via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to Our Sites; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

We will collect and store personal data on your Device using application data caches and other technology.

9. How long do we keep your personal data?

All personal data collected will be evaluated periodically and only kept as long as necessary or in line with legal requirements.

Where personal data is held by

- Insurance Team – holds this data for in line with internal retention periods
- Treasury Team - Where personal data is held for service loans this data will be held for 7 years following payment, or in line with internal retention periods for our accounting systems
- Bursary payments - in line with internal retention periods for our accounting system and the data will be held for 7 years
- Licensing payments – this data is held for 7 years.

10. Related links

- [CCTV](#)
- [Communications privacy notice](#)
- [Corporate and strategic Events privacy notice](#)
- [Photographs and recordings privacy notice](#)