

WHY DO WE PROCESS YOUR PERSONAL INFORMATION?



The following describes the types of personal information we may process about you, the legal bases for which we process it, and those with whom we may share or disclose your personal information.

PURPOSE	PERSONAL INFORMATION PROCESSED	LEGAL BASIS FOR PROCESSING	WE MAY DISCLOSE TO OR SHARE WITH:
Insureds and Potential Insureds			
Account setup, including background checks	Contact Details Risk Information Policy Information Criminal History	Performance of a Contract Legitimate Interest (to ensure we keep accurate information about you, ensure you are within our acceptable risk profile, and prevent crime/ fraud) Consent Legal obligation	Brokers Other insurers/reinsurers Back office service providers Regulators Credit reference agencies Background check agencies Anti-fraud agencies Foreign law enforcement authorities
Evaluating covered risks, risk modeling and underwriting	Risk Information Health Information Criminal History	Legitimate Interests (to determine risk profile and appropriate type/cost of cover) Consent Performance of a Contract	Brokers Other insurers/reinsurers Background check agencies Third Party Administrators
Customer Service Communications	Contact Details Policy Information	Performance of a Contract Consent	Customer Service Providers
Payments to/from individuals	Contact Details Financial Information	Performance of a Contract	Banks/Financial Services Providers
Direct Marketing	Contact Details	Legitimate Interest (to provide insureds with information on products/services of interest) Consent	Service Providers
Complying with legal or regulatory obligations	Contact Details Policy Information Risk Information Financial Information	Legal obligation	Regulators, including FCA, PRA, ICO Law enforcement authorities (domestic or foreign) Legal counsel Courts Other insurers

PURPOSE	PERSONAL INFORMATION PROCESSED	LEGAL BASIS FOR PROCESSING	WE MAY DISCLOSE TO OR SHARE WITH:
Claimants			
Managing insurance or reinsurance claims	Contact Details Policy Information Claim Information Health Information Criminal History Financial Information	Performance of a Contract Legitimate Interest (to maintain accurate records of all claims; to assess circumstances of a claim) Consent Establish, exercise or defend legal claims Statutory provision	Third-Party Administrators Adjusters / claims experts Back-office service providers Outside legal counsel Credit reference agencies Foreign law enforcement
Defending or prosecuting legal claims	Contact Details Policy Information Claim Information Health Information Criminal History Financial Information	Establish, exercise or defend legal claims	Outside legal counsel Law enforcement authorities (domestic or foreign) Courts Regulators including FCA, PRA, ICO
Investigating or prosecuting fraud	Claim Information Anti-Fraud Information	Performance of a Contract Legitimate Interest (to monitor, detect, and prevent fraud) Consent Establish, exercise or defend legal claims	Anti-fraud agencies Law enforcement authorities (domestic or foreign)
Complying with legal or regulatory obligations	Claim Information Health Information Criminal History Financial Information Anti-Fraud Information	Legal obligation Establish, exercise or defend legal claims Statutory provision	Regulators, including CBI, Data Protection Commissioner, PRA, FCA, ICO Ombudsmen, including FSPO and FOS Law enforcement authorities (domestic or foreign) Legal counsel Courts Other insurers
Business Partners			
Managing our business relationship with you	Contact Details	Legitimate Interest (to maintain accurate information on business partners) Consent Performance of a Contract	Back-office service providers