

Privacy Information Notice



qicglobal.com

CONTENTS

| | | |
|----------|---|----|
| A | <u>GENERAL INFORMATION</u> | 4 |
| | <u>1. INTRODUCTION</u> | |
| | <u>2. WHO WE ARE</u> | |
| | <u>3. OUR ADDRESSES</u> | |
| | <u>4. CONTACT DETAILS OF OUR DATA PROTECTION OFFICER (DPO)</u> | |
| | <u>5. INSURANCE MARKET INFORMATION NOTICE</u> | |
| B | <u>PRIVACY INFORMATION NOTICE</u> | 5 |
| | <u>1. INTRODUCTION - HOW THE INSURANCE MARKET WORKS AND FLOWS OF PERSONAL DATA</u> | |
| | <u>2. THE DATA WE MAY COLLECT ABOUT YOU (PERSONAL DATA)</u> | |
| | <u>3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM</u> | |
| | <u>4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS</u> | |
| | <u>5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA</u> | |
| | <u>6. THE PURPOSES AND LEGAL GROUNDS FOR PROCESSING YOUR SPECIAL CATEGORIES OF DATA</u> | |
| | <u>7. PROFILING AND AUTOMATIC DECISION MAKING</u> | |
| | <u>8. RETENTION OF YOUR PERSONAL DATA</u> | |
| | <u>9. INTERNATIONAL TRANSFERS</u> | |
| C | <u>GLOSSARY</u> | 12 |
| | <u>1. KEY INSURANCE TERMS</u> | |
| | <u>2. KEY DATA PROTECTION TERMS</u> | |
| D | <u>ILLUSTRATIONS</u> | 13 |
| | <u>1. APPENDIX 1</u> | |
| | <u>2. APPENDIX 2</u> | |

A

GENERAL INFORMATION

1. INTRODUCTION

This is the privacy notice of
Company: QIC Global Services Limited
Companies House Number: 02676622
Company Address: 21 Lime Street, London, EC3M 7HB.

If you have any questions about our processing of your personal data or this privacy notice, please contact us at:

QIC Global Services Limited
21 Lime Street, London, EC3M 7HB
Compliance2@qicglobal.com
+44 (0)20 7959 1900

2. WHO WE ARE

QIC Global comprises the international operations of Qatar Insurance Group, including the Qatar Re and Antares brands. QIC Global is defined as QIC Capital LLC ("QICC") and its subsidiaries, which collectively form the QIC Global companies including: QIC Capital LLC, Qatar Reinsurance Company Limited, QIC Europe Limited, Markerstudy Insurance Company Limited, Zenith Insurance Plc, St Julians Insurance Company Limited, Antares Managing Agency Limited, Antares Underwriting Asia Pte. Limited, QIC Global Services Limited, QIC Global Services (Bermuda) Limited, and QIC Global Services (Zurich) AG.

QIC Global Services (QICGS) is the group's shared service provider to the group's underwriting companies in the Qatar Re and Antares sub-group.



3. OUR ADDRESSES

United Kingdom: 21 Lime Street, London EC3M 7HB, United Kingdom.
Zurich: Bleicherweg 72, 8002 Zurich, Switzerland.
Bermuda: 71 Pitts Bay Road, Pembroke, HM08, Bermuda.
Singapore: 138 Market Street, CapitaGreen #24-04A, Singapore 048946.
Qatar: 8th Floor, QIC Building, Tamin Street, West Bay Area, P.O. Box 24938, Doha, Qatar.
Malta: The Hedge Business Centre, Triq-Rampa Ta' San Giljan, Balluta Bay, St. Julians, STJ 1062, Malta.
Gibraltar: Suites 846-848 Europort, Europort Road, Gibraltar GX11 1AA.

4. CONTACT DETAILS OF OUR DATA PROTECTION OFFICER (DPO)

Our data protection officer's contact details are
Attn: Compliance Director
QIC Global Services Limited
21 Lime Street, London, EC3M 7HB
Compliance2@qicglobal.com
+44 (0)20 7959 1830

5. INSURANCE MARKET INFORMATION NOTICE

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your personal data, needs to be shared between different insurance market participants. [\[definition\]](#) The insurance market is committed to safeguarding that information.

This notice is designed to help you understand how the insurance market participants process your personal data through the insurance lifecycle [\[here\]](#).

This notice may be updated from time to time: this version is dated 8th February 2018 and historic versions are archived.

In this notice:

we, us or our refers to QIC Global or the relevant insurance market participant. [\[here\]](#)

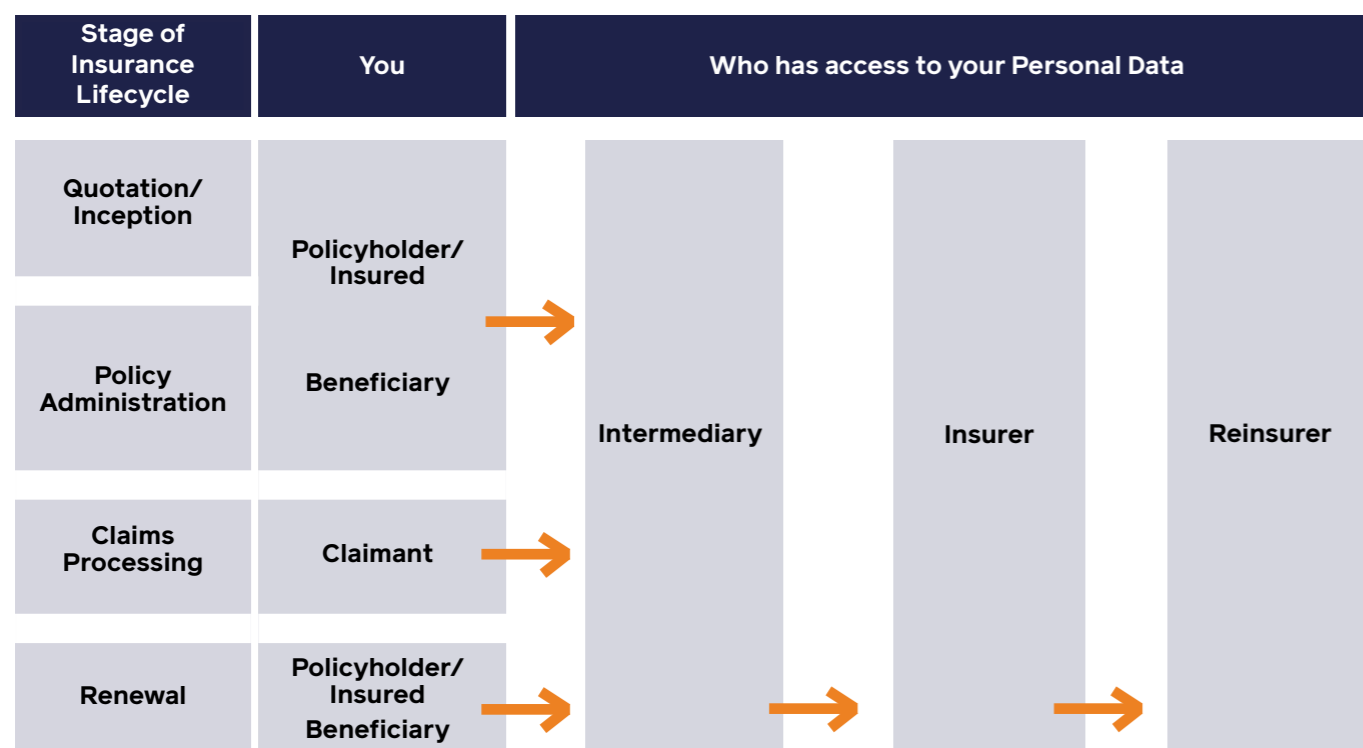
you or your, refers to the individual whose personal data (may be/is being) processed by an insurance market participant (you may be the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy).

B

PRIVACY INFORMATION NOTICE

1. INTRODUCTION - HOW THE INSURANCE MARKET WORKS AND FLOWS OF PERSONAL DATA





2. THE DATA WE MAY COLLECT ABOUT YOU (PERSONAL DATA)

| Types of Personal Data | Details |
|-------------------------------------|---|
| Individual details | Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you |
| Identification details | Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number. |
| Financial information | Bank account or payment card details, income or other financial information |
| Risk details | Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data. For certain types of policy, this could also include telematics data. |
| Policy information | Information about the quotes you receive and policies you take out. |
| Credit and anti-fraud data | Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you. |
| Previous and current claims | Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports. |
| Special categories of personal data | Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, physical or mental health or condition, or data concerning sex life or sexual orientation |

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We might collect your personal data from various sources, including but not limited to:

- you;
- your family members, employer or representative;
- other insurance market participants;
- credit reference agencies;
- anti-fraud databases*, sanctions lists*, court judgements* and other databases;
- government agencies for e.g. MIB, DVLA and HMRC;
- open electoral register*; or
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers

Which of the above sources apply will depend on your particular circumstances.

*These are publicly available sources.

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

The insurance lifecycle involves the sharing of your personal data between insurance market participants, some of which you will not have direct contact with. In addition, your personal data may not have been collected directly by an insurance market participant.

You can find out the identity of the initial data controller of your personal data within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself: the insurer and, if purchased through an intermediary, the intermediary will be the initial data controller and their data protection contact can advise you on the identities of other insurance market participants that they have passed your personal data to.
- Where your employer or another organisation took out the policy for your benefit: you should contact your employer or the organisation that took out the policy who should provide you with details of the insurer or intermediary that they provided your personal data to and you should contact their data protection contact who can advise you on the identities of other insurance market participants that they have passed your personal data to
- Where you are not a policyholder or an insured: you should contact the organisation that collected your personal data who should provide you with details of the relevant participant's data protection contact.

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We set out in the table in Appendix 1:

- The purposes insurance market participants might use your personal data for. If that type of insurance market participant uses your personal data for that particular purpose
- The categories of personal data it collects
- What personal data it might provide to third parties (disclosures).
- The legal grounds for processing that personal data. Those legal grounds are set out in the GDPR.

Please note that in addition to the disclosures we have identified against each purpose, we may also disclose personal data for those purposes to our service providers, professional advisers, contractors, agents and group companies that perform activities on our behalf.

Purposes

The purposes for which we might use your personal data for are:

During the insurance lifecycle:

Quotation/Inception:

- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
- Evaluating the risks to be covered and matching to appropriate policy/premium
- Payment of premium where the insured/policyholder is an individual

Policy administration:

- Client care, including communicating with you and sending you updates
- Payments to and from individuals

Claims Processing:

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigation or prosecuting fraud

Renewals:

- Contacting the insured/policyholder to renew the insurance policy
- Evaluating the risks to be covered and matching to appropriate policy/premium
- Payment of premium where the insured/policyholder is an individual

Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:

- Complying with our legal or regulatory obligations
- General risk modelling
- Transferring books of business, company sales & reorganisations

Other general purposes relating to the operation of our business:

In order to use your personal data to operate our business, but otherwise than in performing our contractual obligations to you, for example:

- to send you important notices such as communications about changes to our terms and conditions and policies;
- to deal with any misuse of our website;
- to provide you with important real-time information about products or services you have ordered from us (e.g. a change of time or location due to unforeseen circumstances);
- to send you information you have requested;
- to deal with your enquiries;
- [where you have submitted a job application we may for a reasonable period keep your details on file for future reference should a suitable position subsequently become available and we may send you information about job opportunities;]
- to develop, deliver and improve our goods or services;
- to help us develop our website to be more useful to you;
- for internal purposes for research, analysis, testing, monitoring, customer communication, risk management and administrative purposes;
- for data analytics;
- for identifying usage trends;
- for determining the effectiveness of promotional campaigns and advertising;
- to protect and defend our rights or property;
- to sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers; or
- in order to enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties. (This would be on the basis of our legitimate interests.)

Our legitimate interests for processing your personal data for the above purposes are: the management and operation of our business; the promotion of our business; and the provision of our services to you. Under no circumstances will we sell any of the personal data provided to us by you.

6. THE PURPOSES AND LEGAL GROUNDS FOR PROCESSING YOUR SPECIAL CATEGORIES OF DATA

In order to provide insurance cover and deal with insurance claims in certain circumstances insurance market participants may need to process your special categories of personal data, such as medical and criminal convictions records, as set out against the relevant purpose.

For certain classes of business we may need to process personal data relating to children.

[Your consent to this processing may be necessary for the insurance market participant to achieve this.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance, handle complaints or pay claims.]

The conditions for processing special category data are listed in Article 9(2) of the GDPR namely:

1. Explicit consent
2. Processing necessary for the purpose of carrying out the obligations and exercising specific rights of the controller or of the data subject.
3. Processing is necessary to protect the vital interests of the data subject or of another natural person
4. Processing relates to personal data which are manifestly made public by the data subject
5. Processing is necessary for the establishment, exercise or defence of legal claims
6. Processing is necessary for reasons of substantial public interest
7. Processing is necessary for the purposes of preventive or occupational medicine
8. Processing is necessary for reasons of public interest in the area of public health and
9. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1)

7. PROFILING AND AUTOMATIC DECISION MAKING

When calculating insurance premiums insurance market participants may compare your personal data against industry averages, in particular to predict or analyse the risk of granting a policy to you. Your personal data may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by insurance market participants to assess information you provide to understand fraud patterns.

Where special categories of personal data are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, your special categories of personal data may also be used for profiling.

Insurance market participants might make some decisions based on profiling and without staff intervention (known as automatic decision making). Insurance market participants will provide details of any automated decision making they undertake without staff intervention in their information notices [and upon request] including:

- where they use such automated decision making
- the logic involved
- the significance of the processing
- the consequences of the automated decision making
- any facility for you to have the logic explained to you and to submit further information so the decision may be reconsidered.

8. RETENTION OF YOUR PERSONAL DATA

We will keep your personal data only for so long as is necessary. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

9. INTERNATIONAL TRANSFERS

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR.

In connection with the transfers:

- the relevant safeguard in place for many transfers is the standard EU model clauses between us and the recipient and a copy can be obtained by contacting us at:

QIC Global Service Limited
21 Lime Street, London, EC3M 7HB
Compliance2@qicglobal.com
+44 (0)20 7959 1900

OR

some transfers are made on the basis of an adequacy decision, namely:

- the Privacy Shield for transfers to the US; or
- the European Commission has decided that the relevant non-EU country ensures an adequate level of protection.

We may need to transfer your data to other entities within QIC Global and/or our parent company Qatar Insurance Company or their subsidiaries which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR as set out above and as per our Intra-Group Data Transfer Agreement. A copy of the Intra-Group Data Transfer Agreement can be obtained by contacting us at:

QIC Global Service Limited
21 Lime Street, London, EC3M 7HB
Compliance2@qicglobal.com
+44 (0)20 7959 1900

No personal data provided by you to QIC Global, which is shared with other Group entities and the parent company will be sold. The contract clauses with 3rd parties and sub-contractors do not permit any selling of personal data.

10. YOUR RIGHTS

If you have any questions in relation to our use of your personal data, you should first contact the data protection contact of the relevant participant. Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal data/special category of data;
- provide you with a copy of the personal data that you have provided to us;
- provide you with your personal data that you have provided to us in an electronic, portable form that you (or we, in certain circumstances) can transmit on to another organisation;
- update any inaccuracies in the personal data we hold;
- delete any special category of data/personal data that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- stop processing of your personal data on the grounds that the processing is causing substantial damage and distress;
- stop processing of your personal data for direct marketing purposes; and
- restrict how we use your personal data whilst a complaint is being investigated.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

In some circumstances you will be required to provide your personal data to us as a requirement necessary to enter into a contract with us. For example, we require certain of your personal data in order to provide insurance or pay claims. We will make clear which of your personal data is mandatory e.g. by putting a * by mandatory fields in our forms. You must provide your personal data to us if you wish us to provide the relevant services to you and if you do not provide your personal data then will impact our ability to provide our services to you.

Where there is an opportunity for you to provide your personal data to us for marketing purposes, you do not have to provide your personal data for this purpose and you can opt out of receiving marketing communications from us at any time. This will not impact our provision of services to you.

Where we process your personal data on the basis of your consent, you may withdraw your consent at any time by contacting us and this will not impact our provision of our services to you.

YOUR RIGHT TO COMPLAIN

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights, or if you think that we have breached the GDPR, then you have the right to complain to the ICO and/or the relevant data protection authority where we have an office. Please see below for contact details of the ICO. Name of other data protections authorities where we have an office are also mentioned below.

England

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF
 Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

Email:
 casework@ico.org.uk

For Switzerland it will be the Federal Data Protection and Information Commissioner. For Bermuda it is their independent privacy commissioner following the passage of the Personal Information Protection Act (PIPA). For Gibraltar it is the Gibraltar Regulatory Authority, which is the nominated Data Protection Commissioner. For Singapore, the Personal Data Protection Commission (PDPC) administers and enforces the Personal Data Protection Act 2012 (PDPA). For Doha, this will be the Data Protection Directorate responsible for implementing and enforcing Qatar Financial Centre Data Protection Regulations. (The Employment Standards Office (ESO) of the Qatar Financial Centre (QFC))

C

GLOSSARY

KEY INSURANCE TERMS:

Beneficiary is an individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the insured/policyholder and there may be more than one beneficiary under an insurance policy

Claimant is either a beneficiary who is making a claim under an insurance policy or an individual or a company who is making a claim against a beneficiary where that claim is covered by the insurance policy

Claims processing is the process of handling a claim that is made under an insurance policy

Quotation is the process of providing a quote to a potential insured/policyholder for an insurance policy

Inception is when the insurance policy starts

Insurance is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression insurance may also mean reinsurance

Insurance policy is a contract of insurance between the insurer and the insured/policyholder

Insurance market participant(s) or participants: is an intermediary, insurer or reinsurer

Insured/policyholder is the individual or company in whose name the insurance policy is issued. A potential insured/policyholder may approach an intermediary to purchase an insurance policy or they may approach an insurer directly or via a price comparison website

Insurers: (sometimes also called underwriters) provide insurance cover to insured/policyholders

in return for premium. An insurer may also be a reinsurer.

Intermediaries help policyholders and insurers arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through intermediaries

Lloyd's: many policies are underwritten in Lloyd's of London. Lloyd's is a specialist insurance market place. To find out more about how Lloyd's operates click on below: <https://www.lloyds.com/>

Policy administration is the process of administering and managing an insurance policy following its inception

Premium is the amount of money to be paid by the insured/policyholder to the insurer in the insurance policy

Reinsurers provide insurance cover

to another insurer or reinsurer. That insurance is known as reinsurance

Renewal is the process of the insurer under an insurance policy providing a quotation to the insured/policyholder for a new insurance policy to replace the existing one on its expiry

We, us or our refers to the relevant insurance market participant [link to diagram with policyholder, insurer, broker, reinsurer].

You or your refers to the individual whose personal data may be processed by an insurance market participant. You may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an insurance policy

KEY DATA PROTECTION TERMS

GDPR: is the EU General Data Protection Regulation and the new UK Data Protection Act, which replaces the UK Data Protection Act 1998 from 25 May 2018.

Data controller: is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used. Any of the insurance market participants when using your personal data for the purposes set out in Section 5 could be data controllers.

Data protection contact: the person named by the relevant insurance market participant who you should contact if you have any queries or

requests regarding your personal data or how we are using it. In many cases (although not all), this person will be the Data Protection Officer of the relevant insurance market participant.

Information Commissioner's Office (ICO) – is the regulator (or National Competent Authority/Data Protection Authority) for data protection matters in the UK.

Personal data: is any data from which you can be identified and which relates to you. It may include data about any claims you make.

Processing of personal data: includes collecting, using, storing, disclosing or erasing your personal data

D

ILLUSTRATIONS

APPENDIX 1:

THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

| Stage of Insurance Lifecycle | You | Who has access to your Personal Data | | | |
|------------------------------|--------------------------------------|--------------------------------------|---------|--------------|-----------|
| Quotation/ Inception | Policyholder/ Insured | Intermediary | Insurer | Intermediary | Reinsurer |
| Policy Administration | Beneficiary | | | | |
| Claims Processing | Claimant | | | | |
| Renewal | Policyholder/ Insured Beneficiary | | | | |

On the following pages is a non-exhaustive list of instances where we are likely to handle Personal Data during the normal course of our day-to-day activities:

| | INTERMEDIARY | | | INSURER | | | REINSURER | | |
|--|---|--|---|---|--|---|--|---|-------------|
| Purpose | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures |
| QUOTATION/INCEPTION Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information | Personal data: <ul style="list-style-type: none"> Performance of our contract with you Compliance with a legal obligation Legitimate interests (to ensure that the client is within our acceptable risk profile) To assist with the prevention of crime and fraud | <ul style="list-style-type: none"> Credit reference agencies Anti-fraud databases | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information | Personal data: <ul style="list-style-type: none"> Performance of our contract with you Compliance with a legal obligation Legitimate interests (to ensure that the client is within our acceptable risk profile) | <ul style="list-style-type: none"> Group companies providing administration Credit reference agencies Anti-fraud databases | | | |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data | Special categories of personal data: <ul style="list-style-type: none"> In the substantial public interest Consent | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data | Special categories of personal data: <ul style="list-style-type: none"> In the substantial public interest Consent | | | | |
| QUOTATION/INCEPTION Evaluating the risks to be covered & matching to appropriate policy/premium | Personal data: <ul style="list-style-type: none"> Individual details Identification details Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to determine the likely risk profile and appropriate insurer and insurance product) | | Personal data: <ul style="list-style-type: none"> Individual details Identification details Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium) | | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium) | |
| | Special categories of personal data: <ul style="list-style-type: none"> Risk details Previous claims Credit and anti-fraud data | Special categories of personal data: <ul style="list-style-type: none"> Consent | | Special categories of personal data: <ul style="list-style-type: none"> Risk details Previous claims Credit and anti-fraud data | Special categories of personal data: <ul style="list-style-type: none"> Consent | | Special categories of personal data: <ul style="list-style-type: none"> Previous claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | |
| QUOTATION/INCEPTION and POLICY ADMINISTRATION Collection or refunding of Premium | <ul style="list-style-type: none"> Individual details Financial information | <ul style="list-style-type: none"> Perform contract Legitimate interests (to recover debts due to us) | <ul style="list-style-type: none"> Banks | <ul style="list-style-type: none"> Individual details Financial information | <ul style="list-style-type: none"> Perform contract Legitimate interests (to recover debts due to us) | <ul style="list-style-type: none"> Banks | | | |

INTERMEDIARY

INSURER

REINSURER

| Purpose | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures |
|---|---|---|---|---|--|---|--------------------|--|---|
| POLICY ADMINISTRATION General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) Consent | | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) | | | | |
| | Special categories of personal data: <ul style="list-style-type: none"> Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | | Special categories of personal data: <ul style="list-style-type: none"> Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | | | | |
| CLAIMS PROCESSING Managing insurance claims including fraud, credit and anti-money laundering and sanction checks | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to assist our clients in assessing and making claims) | Personal data: <ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts Third parties involved in the claim | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to assess the veracity and quantum of claims) | <ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts Third parties involved in the claim | | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to assess the veracity and quantum of claims) |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal Claims | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal claims | | | | |
| CLAIMS PROCESSING Defending or prosecuting legal claims | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to assist our clients in assessing and making claims) | <ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts Third parties involved in the claim | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to defend or make claims) | <ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts Third parties involved in the claim | | | |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal Claims | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal claims | | | | |

INTERMEDIARY

INSURER

REINSURER

| Purpose | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures |
|--|---|---|--|---|---|--|--------------------|---------------|-------------|
| CLAIMS PROCESSING Defending or prosecuting legal claims | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to assist in assessing and making claims) | <ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts Third parties involved in the claim | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to defend or make claims) | <ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts Third parties involved in the claim | | | |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal Claims | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal Claims | | | | |
| CLAIMS PROCESSING Investigating and prosecuting fraud | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to assist with the prevention and detection of fraud) | <ul style="list-style-type: none"> Solicitors Private Investigators Police Experts Third parties involved in the investigation or prosecution Other insurers Anti-fraud databases | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to assist with the prevention and detection of fraud) | <ul style="list-style-type: none"> Solicitors Private Investigators Police Experts Third parties involved in the investigation or prosecution Other insurers Anti-fraud databases | | | |
| | Special categories of personal data: <ul style="list-style-type: none"> Health data Criminal records data Other sensitive data Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal claims Substantial Public Interest | | Special categories of personal data: <ul style="list-style-type: none"> Health data Criminal records data Other sensitive data Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Legal claims Substantial Public Interest | | | | |
| RENEWALS Contacting you in order to renew the insurance policy | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) Consent | | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Perform contract Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of | | | | |
| | Special categories of personal data: <ul style="list-style-type: none"> Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | Special categories of personal data: <ul style="list-style-type: none"> Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | | | | | |

INTERMEDIARY

INSURER

REINSURER

| Purpose | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures | Categories of data | Legal grounds | Disclosures |
|--|---|--|--|---|--|--|---|--|--|
| THROUGHOUT THE INSURANCE LIFECYCLE Transferring books of business, company sales and reorganisations | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information Marketing data | Personal data: <ul style="list-style-type: none"> Legitimate interests (to structure our business appropriately) Legal obligation | <ul style="list-style-type: none"> Courts Purchaser | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to structure our business appropriately) Legal obligation | <ul style="list-style-type: none"> Courts Purchaser | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to structure our business appropriately) Legal obligation | <ul style="list-style-type: none"> Courts Purchaser |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent [Substantial Public Interest] | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent [Substantial Public Interest] | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent [Substantial Public Interest] | |
| THROUGHOUT THE INSURANCE LIFECYCLE General risk modelling & underwriting | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to build risk models that allow placing of risk with appropriate insurers) | | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums) | | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums) | |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | | Special categories of personal data: <ul style="list-style-type: none"> Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent | |
| THROUGHOUT THE INSURANCE LIFECYCLE Complying with our legal or regulatory obligations | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information Marketing data | Personal data: <ul style="list-style-type: none"> Legal obligation | <ul style="list-style-type: none"> PRA, FCA, ICO and other regulators Police Other insurers (under court order) Insurance Fraud database | Personal data: <ul style="list-style-type: none"> Individual details Identification details Financial information Policy information | Personal data: <ul style="list-style-type: none"> Legal obligation | <ul style="list-style-type: none"> PRA, FCA, ICO and other regulators Police Other insurers (under court order) | Personal data: <ul style="list-style-type: none"> Individual details Policy information | Personal data: <ul style="list-style-type: none"> Legal obligation | <ul style="list-style-type: none"> PRA, FCA, ICO and other regulators |
| | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Substantial Public Interest | | Special categories of personal data: <ul style="list-style-type: none"> Credit and anti-fraud data Risk Details Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Substantial Public Interest | | Special categories of personal data: <ul style="list-style-type: none"> Previous claims Current claims | Special categories of personal data: <ul style="list-style-type: none"> Consent Substantial Public Interest | |

| For processing personal data and special categories of personal data | |
|---|---|
| Legal Ground | Details |
| Performance of our contract with you | Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract. |
| Compliance with a legal obligation | Processing is necessary for compliance with a legal obligation to which we are subject. |
| Protection of vital interests of you or another person | Processing is necessary in order to protect the vital interests of you or of another natural person. |
| In the public interest | Processing is necessary for the performance of a task carried out in the public interest. |
| For our legitimate business interests | Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose. |
| For processing special categories of personal data | |
| Your explicit consent (optional) | <p>You have given your explicit consent to the processing of those personal data for one or more specified purposes.</p> <p>You are free to withdraw your consent, by contacting our Data Protection Contact.</p> |
| Your explicit consent (necessary) | <p>You have given your explicit consent to the processing of those personal data for one or more specified purposes, where we are unable to procure, provide or administer insurance cover without this consent.</p> <p>You are free to withdraw your consent by contacting our Data Protection Contact. However withdrawal of this consent will impact our ability to provide insurance or pay claims.</p> |
| Protection of vital interests of you or another person, where you are unable to consent | Processing is necessary to protect the vital interests of you or of another natural person where you are physically or legally incapable of giving consent. |
| For legal claims | Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity. |
| In the substantial public interest | Processing is necessary for reasons of substantial public interest, on the basis of EU or UK law. |
| For health services | Processing is necessary for the purposes of preventive or occupational medicine, for medical diagnosis, the provision of health or social care or treatment on the basis of EU or UK law or pursuant to contract with a health professional who is under legal or professional obligations of secrecy. |