

# Chubb Privacy

## Appendix 2 Legal Basis for Processing

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Prospective Insureds and Insured Persons			
<b>Set up a record on our systems</b>	<ul style="list-style-type: none"> <li>Contact Details</li> <li>Personal Risk Information</li> <li>Policy Information</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract (<i>cf. Article 6(1)(b) of the General Data Protection Regulation (the "GDPR")</i>)</li> <li>Legitimate interests (<i>to ensure we have an accurate record of all Insured Persons we cover</i>) (<i>cf. Article 6(1)(f) of the GDPR</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
<b>Carry out background, sanction, fraud and credit checks</b>	<ul style="list-style-type: none"> <li>Contact Details</li> <li>Personal Risk Information</li> <li>Criminal Data</li> </ul>	<ul style="list-style-type: none"> <li>Conditional Consent (<i>cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR</i>)</li> <li>Legitimate interests (<i>to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud</i>) (<i>cf. Article 6(1)(f) of the GDPR</i>)</li> <li>Local law exemption (<i>cf. section 8(3) and section 11(2) of the Danish Data Protection Act</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> <li>Credit reference agencies</li> <li>Anti-fraud databases</li> </ul>
<b>Consider the underwriting submission, assess risk and write policy</b>	<ul style="list-style-type: none"> <li>Personal Risk Information</li> <li>Health Data</li> <li>Criminal Data</li> </ul>	<ul style="list-style-type: none"> <li>Take steps to enter into a contract (<i>cf. Article 6(1)(b) of the GDPR</i>)</li> <li>Legitimate interests (<i>to determine the likely risk profile and appropriate level, cost and type</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Third Party Administrators</li> <li>Other Insurers / Reinsurers</li> </ul>

		<ul style="list-style-type: none"> <li>• <i>of cover to extend, if any) (cf. Article 6(1)(f) of the GDPR)</i></li> <li>• Local law exemption (cf. section 8(3) and section 11(2) of the Danish Data Protection Act)</li> <li>• If we have specifically asked for it, your consent (cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR)</li> </ul>	
<b>Manage renewals</b>	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Policy Information</li> <li>• Personal Risk Information</li> <li>• Health Data</li> <li>• Criminal Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (cf. Article 6(1)(b) of the GDPR)</li> <li>• Legitimate Interests (to determine whether to extend cover for a renewal period, and if so, on what terms) (cf. Article 6(1)(f) of the GDPR)</li> <li>• Local law exemption (cf. section 8(3) and section 11(2) of the Danish Data Protection Act)</li> <li>• If we have specifically asked for it, your consent (cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Administrators</li> <li>• Service Providers</li> </ul>
<b>Provide client care, assistance and support</b>	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Policy Information</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (cf. Article 6(1)(b) of the GDPR)</li> <li>• Conditional Consent (cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>• Assistance Providers</li> <li>• Service Providers</li> </ul>
<b>Receive premiums and payments</b>	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (cf. Article 6(1)(b) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>• Banks</li> </ul>
<b>Marketing</b>	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest) (cf. Article 6(1)(f) of the GDPR)</li> <li>• Consent (cf. Article 6(1)(a) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>• Services Providers</li> </ul>
<b>Comply with legal and regulatory obligations</b>	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Policy Information</li> <li>• Personal Risk Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Obligation (cf. Article 6(1)(c) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>• Regulators (e.g. ACPR, CNIL)</li> <li>• Law enforcement bodies</li> </ul>

- Financial Information

- Courts
- Other Insurers (under court order)

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Claimant			
<b>Receive notification of claim</b>	<ul style="list-style-type: none"> <li>• Policy Information</li> <li>• Claim Details</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (<i>cf. Article 6(1)(b) of the GDPR</i>)</li> <li>• Legitimate interests (<i>third party claimants</i>) (to maintain an accurate record of all claims received and the identity of claimants) (<i>cf. Article 6(1)(f) of the GDPR</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Administrators</li> <li>• Assistance providers</li> <li>• Service providers</li> </ul>
<b>Assess claim</b>	<ul style="list-style-type: none"> <li>• Claim Details</li> <li>• Health Data</li> <li>• Criminal Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (<i>cf. Article 6(1)(b) of the GDPR</i>)</li> <li>• Legitimate interests (to assess the circumstances of a claim) (<i>cf. Article 6(1)(f) of the GDPR</i>)</li> <li>• Local law exemption (<i>cf. section 8(3) of the Danish Data Protection Act</i>)</li> <li>• If we have specifically asked for it, your consent (<i>cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR</i>)</li> <li>• Establish, exercise or defend legal claims (<i>cf. Article 9(2)(f) of the GDPR</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Administrators</li> <li>• Loss Adjusters</li> <li>• Solicitors</li> <li>• Claims Experts</li> </ul>
<b>Monitor and detect fraud</b>	<ul style="list-style-type: none"> <li>• Claim Details</li> <li>• Anti-fraud Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract (<i>cf. Article 6(1)(b) of the GDPR</i>)</li> <li>• Legitimate interests (to monitor, assess and ultimately prevent fraud) (<i>cf. Article 6(1)(f) of the GDPR</i>)</li> <li>• Local law exemption (<i>cf. section 8(3) of the Danish Data Protection Act</i>)</li> <li>• If we have specifically asked for it, your consent</li> </ul>	<ul style="list-style-type: none"> <li>• Surveillance providers (<i>exceptionally</i>)</li> <li>• Anti-fraud database</li> <li>• Law enforcement bodies</li> </ul>

		<ul style="list-style-type: none"> <li>(cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR)</li> <li>Establish, exercise or defend legal claims (cf. Article 9(2)(f) of the GDPR)</li> </ul>	
<b>Settle Claim</b>	<ul style="list-style-type: none"> <li>Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract (cf. Article 6(1)(b) of the GDPR)</li> <li>Legitimate interests (third party claimants) (to settle claims to successful third party claimants) (cf. Article 6(1)(f) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>Banks</li> <li>Solicitors</li> </ul>
<b>Comply with legal and regulatory obligations</b>	<ul style="list-style-type: none"> <li>Policy Information</li> <li>Claim Details</li> <li>Anti-fraud Data</li> <li>Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>Legal obligation (cf. Article 6(1)(c) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>Regulators (e.g. ACPR, CNIL)</li> <li>Law enforcement bodies</li> <li>Courts</li> <li>Other Insurers (under court order)</li> </ul>
Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Business Partners and Visitors			
<b>Manage relationships</b>	<ul style="list-style-type: none"> <li>Contact Details</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to maintain an accurate client and partner relationship management platform) (cf. Article 6(1)(f) of the GDPR)</li> <li>Consent (cf. Article 6(1)(a) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
<b>Administer contracts</b>	<ul style="list-style-type: none"> <li>Contact Details</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract (cf. Article 6(1)(b) of the GDPR)</li> </ul>	
<b>Marketing</b>	<ul style="list-style-type: none"> <li>Contact Details</li> <li>Marketing</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to communicate to Business Partners about events, services or products which may be of interest to their sector) (cf. Article 6(1)(f) of the GDPR)</li> <li>Consent (cf. Article 6(1)(a) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
<b>Run events and host office visitors, accommodate website visitors</b>	<ul style="list-style-type: none"> <li>Website or Office Visitor</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to organise and host events which may</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>

- *be of interest to Business Partners)*
- *Consent (cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR)*

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Applicable to all			
<b>Transfer books of business</b>	<ul style="list-style-type: none"> <li>• <b>All</b> (<i>where relevant to the book</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests (<i>to structure our business appropriately</i>) (cf. Article 6(1)(f) of the GDPR)</li> <li>• Legal obligation (cf. Article 6(1)(c) of the GDPR)(<i>insurance transfer scheme under applicable law</i>)</li> <li>• Local law exemption (cf. section 8(3) and section 11(2) of the Danish Data Protection Act)</li> <li>• Consent (cf. Article 6(1)(a) or Article 9(2)(a) of the GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>• Courts</li> <li>• Purchaser</li> <li>• Professional advisors</li> </ul>
<b>Sale or organisation of a Chubb company</b>	<ul style="list-style-type: none"> <li>• <b>All</b></li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests (<i>to structure our business appropriately</i>) (cf. Article 6(1)(f) of the GDPR)</li> <li>• Legal obligation (cf. Article 6(1)(c) of the GDPR)(<i>insurance transfer scheme under applicable law</i>)</li> <li>• Local law exemption (cf. section 8(3) and section 11(2) of the Danish Data Protection Act)</li> <li>• Consent (cf. Article 6(1)(a))</li> </ul>	<ul style="list-style-type: none"> <li>• Purchaser</li> <li>• Professional advisors</li> </ul>
<b>Recording of telephone calls</b>	<ul style="list-style-type: none"> <li>• Contact Details;</li> <li>• Claim Details;</li> <li>• Other information shared in the context of the call</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (cf. Article 6(1)(a))</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Regulators</li> <li>• Courts</li> <li>• Law Enforcement Agencies</li> </ul>

Updated November 2019