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			
Set up a record on our systems	• Contact Details • Personal Risk Information • Policy Information	• Performance of a contract • Legitimate interests *(to ensure we have an accurate record of all Insured Persons we cover)*	• Service Providers
Carry out background, sanction, fraud and credit checks	• Contact Details • Personal Risk Information • Criminal Data	• Consent • Legitimate interests *(to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud)* • Legal obligation • Explicit consent, as a lawful exemption	• Service Providers • Credit reference agencies • Anti-fraud databases
Consider the underwriting submission, assess risk and write policy	• Personal Risk Information • Health Data • Criminal Data	• Take steps to enter into a contract • Legitimate interests (to determine the likely risk profile and appropriate level, cost and type of cover to extend, if any) • If we have not asked for your consent, the 'insurance purposes' exemption • If we have specifically asked for it, your consent	• Third Party Administrators • Other Insurers / Reinsurers
Manage renewals	• Contact Details • Policy Information • Personal Risk Information • Health Data	• Performance of a contract • Legitimate Interests *(to determine whether to extend*	• Third Party Administrators • Service Providers

	• Criminal Data	*cover for a renewal period, and if so, on what terms)* • If we have not asked for your consent, the 'insurance' purposes' exemption • If we have specifically asked for it, your consent	
Provide client care, assistance and support	• Contact Details • Policy Information	• Performance of a contract • Consent	• Assistance Providers • Service Providers
Receive premiums and payments	• Contact Details • Financial Information	• Performance of a contract	• Banks
Marketing	• Contact Details • Marketing	• Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest) • Consent	• Services Providers
Comply with legal and regulatory obligations	• Contact Details • Policy Information • Personal Risk Information • Financial Information	• Legal Obligation	• Regulators *(e.g. ACPR, CNIL)* • Law enforcement bodies • 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			
Receive notification of claim	• Policy Information • Claim Details	• Performance of a contract • Legitimate interests *(third party claimants) (to maintain an accurate record of all claims received and the identity of claimants)*	• Third Party Administrators • Assistance providers • Service providers
Assess claim	• Claim Details • Health Data • Criminal Data	• Performance of a contract • Legitimate interests *(to assess the circumstances of a claim)* • If we have not asked for your consent, the 'insurance purposes' exemption • If we have specifically asked for it, your consent	• Third Party Administrators • Loss Adjusters • Solicitors • Claims Experts

		• Establish, exercise or defend legal claims	
Monitor and detect fraud	• Claim Details • Anti-fraud Data	• Performance of a contract • Legitimate interests *(to monitor, assess and ultimately prevent fraud)* • If we have not asked for your consent, the 'insurance purposes' • If we have specifically asked for it, your consent • exemption • ‘Preventing fraud' exemption • Establish, exercise or defend legal claims	• Surveillance providers *(exceptionally)* • Anti-fraud database • Law enforcement bodies
Settle Claim	• Financial Information	• Performance of a contract • Legitimate interests *(third party claimants) (to settle claims to successful third party claimants)*	• Banks • Solicitors
Comply with legal and regulatory obligations	• Policy Information • Claim Details • Anti-fraud Data • Financial Information	• Legal obligation	• Regulators *(e.g. ACPR, CNIL)* • Law enforcement bodies • 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
Business Partners and Visitors			
Manage relationships	• Contact Details	• Legitimate interests *(to maintain an accurate client and partner relationship management platform)* • Consent	• Service Providers
Administer contracts	• Contact Details	• Performance of a contract	
Marketing	• Contact Details • Marketing	• Legitimate interests *(to communicate to Business Partners about events, services or products which may be of interest to their sector)* • Consent	• Service Providers
Run events and host office visitors,	• Website or Office Visitor	• Legitimate interests *(to organise and host*	• Service Providers

accommodate website visitors		*events which may be of interest to Business Partners)* • Consent	
Activity	**Type of information collected**	**The basis on which we use the information**	**Who we may disclose the information to**
Applicable to all			
Transfer books of business	• **All** *(where relevant to the book)*	• Legitimate interests *(to structure our business appropriately)* • Legal obligation *(insurance transfer scheme under applicable law)* • Consent • The 'insurance purposes' exemption	• Courts • Purchaser • Professional advisors
Sale or organisation of a Chubb company	• **All**	• Legitimate interests *(to structure our business appropriately)* • Legal obligation *(insurance transfer scheme under applicable law)* • Consent • The 'insurance purposes'	• Purchaser • Professional advisors
Recording of telephone calls	• Contact Details; • Claim Details; • Other information shared in the context of the call	• Legal obligation • Legitimate interests *(to train staff, to provide evidence of intention to enter into an insurance contract, to help resolve complaints, to improve customer service or to detect fraud)*	• Service Providers • Regulators • Courts • Law Enforcement Agencies

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