



บริษัท เอช ไอเอ็นเอ โอเวอร์ซีส์
อินชัวร์นซ์ จำกัด
399 อาคารอินเตอร์เชนจ์ 21 ชั้น 30
ถนนสุขุมวิท แขวงคลองเตยเหนือ
เขตวัฒนา กรุงเทพฯ 10110

ACE INA Overseas Insurance
Company Limited, A Chubb Company
399 Interchange 21 Building
Level 30, Sukhumvit Road
Klongtoey Nua, Wattana
Bangkok 10110

O +66 0 2611 4040
F +66 0 2611 4310
www.chubb.com/th

ACE Master Privacy Policy

Data Protection at ACE

At ACE INA Overseas Insurance Company Limited (Thailand) ("ACE", "we", "us"), we routinely collect and use personal data about individuals, including insured persons, claimants or business partners ("you"). We are aware of our responsibilities to handle your personal data with care, to keep it secure and comply with applicable data protection laws.

How this Policy Works

The purpose of this Policy is to provide a clear explanation of when, why and how we collect and use information relating to you, which enables the identification of you, whether directly or indirectly ("personal data").

Important

Do read this Policy with care. It provides important information about how we use personal data and explains your statutory rights. This Policy is not intended to override the terms of any insurance policy or contract you have with us, nor rights you might have available under applicable data protection laws.

Data Protection Policy

1. Who is responsible for looking after your personal data?

ACE INA Overseas Insurance Company Limited (Thailand) will be principally responsible for looking after your personal data (your [Data Controller](#)).

Where your personal data has been passed to another Data Controller (e.g. a reinsurer), the first [Data Controller](#) will inform you of the other [Data Controllers](#) with whom they have shared your personal data who you can contact about their use of your personal data, as we do in [Section 6](#) of this policy.

You should be aware that although we are principally responsible for looking after your personal data, information may be held in databases which can be accessed by other companies in the Chubb group. When accessing your personal data, Chubb companies will comply with the standards set out in this Policy.

2. What personal data do we collect?

Prospective Insureds and Insured Persons. In order to underwrite and administer insurance policies, we collect information about the prospective insured, policyholder and related parties. This may include information about previous quotes obtained, background and contact information on the prospective insured, policyholder or their representative and matters relevant to the assessment of risk and management of insurance policies. The prospective insured or policyholder may be an individual, company or their representative. The level and type of personal data we collect and use varies depending on the type of policy that is applied for or held and may include information on other individuals who need to be considered as part of the policy. In some instances, it is necessary for us to collect and use [Sensitive Personal Data](#), such as information about health or past criminal convictions. We are required to establish a legal exemption to use your [Sensitive Personal Data](#) - see [Section 5](#) for further details.

If you are an insured person, from time to time you may need to provide us with the personal data of third parties, for example an injured third party in relation to a claim under a liability policy.

Wherever possible, you should take steps to inform the third party that you need to disclose their details to us, identifying ACE as your insurer. We will process their personal data in accordance with this Policy.

Claimants. If you are making a claim under a policy, we will collect your basic contact details together with information about the nature of your claim and any previous claims. If you are an insured person we will need to check details of the policy you are insured under and your claims history. Depending on the nature of your claim, it may be necessary for us to collect and use [Sensitive Personal Data](#), such as details of personal injury you may have suffered during an accident.

Business Partners and Visitors. If you are a business partner, we will collect your business contact details. We may also collect information about your professional expertise and experience. We may collect your contact details if you visit our website, register for a newsletter or attend one of our events. If we collect personally identifiable information through our website, we will make it clear when we collect personal information and will explain what we intend to do with it.

For more information on what information we collect, please see Appendix 1.

3. When do we collect your personal data?

Prospective Insureds and Insured Persons

- We will collect information from you directly when you apply for a policy.
- Information about you may also be provided to us by an insurance broker, your employer, family member or any other third person who may be applying for a policy which names or benefits you.
- We may collect information about you from other sources where we believe this is necessary to manage effective underwriting of the risk associated with a policy and/or helping fight financial crime. These other sources may include public registers and databases managed by credit reference agencies, government agencies such as the Department of Land Transport and the Revenue Department, and other reputable organisations.

Claimants

- We will collect information from you when you notify us of a claim. You might make a claim to us directly or through your representative or through your broker or one of our representatives who manage claims on our behalf.
- We may also collect information about you if the claim is made by another person who has a close relationship with you or is otherwise linked to the claim - for example if the policyholder is your employer, or if you are the subject of a third party claim.
- We may also be provided with information by your lawyers (or acting on behalf of your employer).
- We may collect information from other sources where we believe this is necessary to assist in validating claims and/or fighting financial crime. This may include consulting public registers, social media and other online sources, credit reference agencies and other reputable organisations.

Business Partners and Visitors

- We will collect information about you if you or your company provides your contact or other information to us in the course of working with us, either directly as a business partner or as a representative of your company.

- We may also collect information about you if you attend meetings, events or conferences that we organise, contact us through our website or sign up to one of our newsletters or bulletin services.
- We may collect information from other public sources (e.g. your employer's website) where we believe this is necessary to help manage our relationships with our business partners.

4. What do we use your personal data for?

Prospective Insureds and Insured Persons. If you are a prospective insured or an insured person we will use your personal data to consider an application for an insurance policy, assess and evaluate risk, and subject to applicable terms and conditions, provide you with a policy. If we have provided you with your policy we will use your personal data to administer your policy, deal with your queries, and manage the renewal process. We will also need to use your personal data for regulatory purposes associated with our legal and regulatory obligations as a provider of insurance.

Claimants. If you are a claimant we will use your personal data to assess the merits of your claim and potentially to pay out a settlement. We may also need to use your personal data to evaluate the risk of potential fraud. If you are also an insured person, we will use personal data related to your claim to inform the renewal process and potentially future policy applications.

Business Partners and Visitors. If you are a business partner we will use your personal data to manage our relationship with you, including sending you marketing materials (where we have appropriate permissions) and to invite you to events. Where relevant, we will use your personal data to deliver or request the delivery of services, and to manage and administer our contract with you or with your employer. If you are a visitor, we will use your personal data; typically, to register for certain areas of our website, enquire for further information, distribute requested reference materials, or invite you to one of our events.

Data analytics. We routinely analyse information in our various systems and databases to help improve the way we run our business, to provide a better service and to enhance the accuracy of our risk and other actuarial models. We take steps to protect privacy by aggregating and where appropriate anonymising data fields before allowing information to be available for analysis.

5. Protecting your privacy

We will make sure that we only use your personal data for the purposes set out in [Section 4](#) and in [Appendix 2](#) where we are satisfied that:

- you have provided your consent to us using the data in that way
- our use of your personal data is necessary to perform a contract or take steps to enter into a contract with you (e.g. to manage your insurance policy)
- our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we have (e.g. to comply with OIC requirements)
- our use of your personal data is necessary to support 'legitimate interests' that we have as a business (for example, to improve our products, or to carry out analytics across our datasets), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

Before collecting and/or using any [Sensitive Personal Data](#) we will establish a lawful exemption which will allow us to use that information. If your Sensitive Personal Data is collected on a form (including on a website) or over the telephone, further information about the exemption may be provided on that form. This exemption will typically be:

- your explicit consent (if this is specifically requested from you on a data collection form, in language which references your consent);
- the establishment, exercise or defence by us or third parties of legal claims; or
- a specific exemption provided by law.

PLEASE NOTE. If you provide your explicit consent to permit us to process your [Sensitive Personal Data](#), you may withdraw your consent to such processing at any time. However, you should be aware that if you choose to do so we may be unable to continue to provide insurance services to you (and where you withdraw consent to an insurer's or reinsurer's use it may not be possible for the insurance cover to continue). This may mean that your policy needs to be cancelled. If you choose to withdraw your consent we will tell you more about the possible consequences, including the effects of cancellation, (which may include that you have difficulties finding cover elsewhere), as well as any fees associated with cancellation.

Please see Appendix 2 to find out more about the information we collect and use about you and why we believe it is appropriate to use that information for such activities.

6. Who do we share your personal data with?

We work with many third parties, to help manage our business and deliver services. These third parties may from time to time need to have access to your personal data.

For [Prospective Insureds and Insured Persons](#) these third parties may include:

- [Brokers](#), Other Insurers / Reinsurers and [Third Party Administrators](#) who work with us to help manage the underwriting process and administer our policies
- [Service Providers](#), who help manage our IT and back office systems
- Our regulators, which includes the OIC, as well as other regulators and law enforcement agencies in Thailand and around the world
- Agencies and organisations working to prevent fraud in financial services
- [Lawyers](#) and other professional services firms

For **Claimants** this may include:

- [Third Party Administrators](#) who work with us to help manage the claims process
- [Loss Adjusters](#) and [Claims Experts](#) who help us assess and manage claims
- [Service Providers](#), who help manage our IT and back office systems
- [Assistance Providers](#), who can help provide you with assistance in the event of a claim
- [Lawyers](#), who may be legal representatives for you, us or a third party claimant
- Agencies and organisations working to prevent fraud in financial services

We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other insurers. If we were to sell part of our businesses we would need to transfer your personal data to the purchaser of such businesses.

Assistance Providers: these are a special category of service provider which we use to help provide you with emergency or other assistance in connection with certain policies (e.g. certain travel policies).

Brokers: insurance brokers arrange and negotiate insurance coverage of individuals or companies and deal directly with insurers, such as ACE.

Claims Experts: these are experts in a particular field which is relevant to a claim, for example medicine, forensic accountancy, mediation or rehabilitation, who are engaged by ACE to help us properly assess the merit and value of a claim, provide advice on its settlement, and advise on the proper treatment of claimants.

Data Controller: means a natural or juristic person (such as a company) which has the power and duty to make decisions regarding the collection, use or disclosure of personal data. For example, a ACE entity which sells you an insurance policy will be your Data Controller as it determines how it will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used.

OIC: the OIC is the Office of Insurance Commission, which is an insurance regulatory body.

Personal Data Protection Committee: the Personal Data Protection Committee regulates the processing of personal data by all organisations within Thailand.

Prospective Insured and Insured Person: we use this term to refer to prospective, active or former individual policyholders, as well as any individual who benefits from insurance coverage under one of our policies (for example, where an employee benefits from coverage taken out by their employer).

Loss Adjuster: these are an independent claims specialist which investigates complex or contentious claims on our behalf.

Other Insurers / Reinsurers: some policies are insured on a joint or "syndicate" basis. This means that a group of insurers (including us) will join together to write a policy. Policies may also be reinsured, which means that the insurer will purchase its own insurance, from a reinsurer, to cover some of the risk the insurer has underwritten in your policy. ACE purchases reinsurance, and also acts as a reinsurer to other insurance firms.

Sensitive Personal Data: means any personal data relating to your health, disability, genetic or biometric data, criminal records, sexual behaviour, racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership. At ACE, (other than in the context of our employees, which is outside the scope of this Policy) we routinely only process Sensitive Personal Data relating to health or criminal records.

Service Providers: these are a range of third parties to whom we outsource certain functions of our business. For example, we have service providers who help us manage our IT and back office systems. Some of these providers use 'cloud based' IT applications or systems, which means that your personal data will be hosted on their servers, but under our control and direction. We require all our service providers to respect the confidentiality and security of personal data.

Lawyers: we frequently use lawyers to advise on complex or contentious claims or to provide us with non-claims related legal advice. In addition, if you are a claimant you may be represented by your own lawyer(s).

Third Party Administrators (or TPAs): these are companies outside the Chubb group which administer the underwriting of policies, the handling of claims, or both, on our behalf. We require all TPAs to ensure that your personal data is handled lawfully, and in accordance with this Policy and our instructions.

7. Direct Marketing

We may use your personal data to send you direct marketing communications about our insurance products or our related services. This may be in the form of email, post, SMS, telephone or targeted online advertisements.

In most cases our processing of your personal data for marketing purposes is based on our legitimate interests to provide information you might find helpful to manage your insured risks, insurance renewals and other products, services and offers that may be of interest to you, although in some cases (such as where required by law) it may be based on your consent. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out links in electronic communications or by contacting us using the details set out in [Section 11](#).

We take steps to limit direct marketing to a reasonable and proportionate level and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

8. International Transfers

From time to time we may need to share your personal data with members of the Chubb group who may be based outside Thailand. We may also allow our [Service Providers](#) or [Assistance Providers](#), who may be located outside Thailand, access to your personal data. We may also make other disclosures of your personal data overseas, for example if we receive a legal or regulatory request from a foreign law enforcement body.

We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

- We will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights,
- Transfers within the Chubb group of companies will be covered by standards of protection designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within the Chubb group,
- Transfers to [Service Providers](#) and other third parties will be protected by contractual commitments and where appropriate further assurances, such as certification schemes,
- Any requests for information we receive from law enforcement or regulators will be carefully checked before personal data is disclosed.

You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us as set out in [Section 11](#) if you would like further information.

9. How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes listed in [Section 4](#) of this Policy. In some circumstances we may retain your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulator, tax or accounting requirements.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

Where your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

10. What are your rights

You have a number of rights in relation to your personal data.

You may request [access](#) to your data, correction of any mistakes in your data, [erasure](#) of records where no longer required, [restriction](#) on the processing of your data, [objection](#) to the processing of your data, [data portability](#) and various information in relation to the basis for [international transfers](#). You may also exercise a right to complain to the [Personal Data Protection Committee](#). More information about each of these rights can be found by clicking on the relevant link or by referring to the table set out further below.

To exercise your rights you may contact us as set out in [Section 11](#). Please note the following if you do wish to exercise these rights:

Right	What this means
Access	<p>You can ask us to:</p> <ul style="list-style-type: none"> confirm whether we are processing your personal data; and give you a copy of that data. <p>We may not have to comply with a request where it is permitted by law or pursuant to a court order, and such access would adversely affect the rights and freedoms of other persons.</p>
Rectification	<p>You can ask us to rectify inaccurate personal data. We may seek to verify the accuracy of the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none"> It is no longer needed for the purposes for which it was collected; or You have withdrawn your consent (where the data processing was based on consent); or Following a successful right to object (see 'Objection' below); or It has been processed unlawfully. <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary:</p> <ul style="list-style-type: none"> For compliance with a legal obligation; or For the establishment, exercise or defence of legal claims. <p>There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request.</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none"> Its accuracy is contested (see Rectification), to allow us to verify its accuracy; or The processing is unlawful, but you do not want it erased; or it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or You have exercised the right to object, and verification of overriding grounds is pending. <p>We can continue to use your personal data following a request for restriction, where:</p> <ul style="list-style-type: none"> we have your consent; or to establish, exercise or defend legal claims; or where permitted by law.

Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Data Controller, but in each case only where:</p> <ul style="list-style-type: none"> the processing is based on your consent or on the performance of a contract with you; the processing is carried out by automated means; and the provision or 'porting' would not violate the rights and freedoms of other persons.
Objection	<p>You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.</p> <p>Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.</p>
Personal Data Protection Committee	<p>You have a right to lodge a complaint with the Personal Data Protection Committee about our processing of your personal data.</p> <p>We ask that you please attempt to resolve any issues with us first although you have a right to contact the Personal Data Protection Committee at any time.</p>
Identity	<p>We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request in respect of such records.</p>
Timescales	<p>We aim to respond to any valid requests within one month unless it is particularly complicated or you have made several requests in which case we aim to respond within three months. We will let you know if we are going to take longer than one month. We might ask you if you can tell us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.</p>

11. Contact and complaints

The primary point of contact for all issues arising from this Policy, including requests to exercise data subject rights, is our Data Protection Officer.

The Data Protection Officer can be contacted in the following ways:

Email:

dpo.th@chubb.com

Write to:

Data Protection Officer,
ACE INA Overseas Insurance Company Limited (Thailand), 399 Interchange 21 Building
Level 30, Sukhumvit Road Klongtoey Nua, Wattana, Bangkok 10110

[Web form](#)

If you have a complaint or concern about how we use your personal data, please contact us in the



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first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with the Personal Data Protection Committee at any time.

Updated April 2020

Appendix 1 – Categories of Personal Data

Information type	Details of information that we typically capture
Prospective Insureds and Insured Persons	
Contact Details	Name, address, telephone number, email address
Identification Information	Identity card number, passport number, work permit number
Policy Information	Policy number, relationship to the policyholder, details of policy including insured amount, exceptions etc, previous claims
Personal Risk Information	<p>Gender, date of birth, claims history.</p> <p>Vehicle registration number</p> <p>Professional history or CV</p> <p>Publicly available information</p> <p>Schedule of possessions, property construction, physical condition, security, fire protection and value</p> <p>Travel information</p> <p>Sensitive Data</p> <p>Health data – eg physical and mental conditions, medical history and procedures, relevant personal habits</p>
Financial Information	Bank account details (where you are the payer of the policy premium) or credit card data used for billing
Marketing	Name, email address, interests / marketing list assignments, record of permissions or marketing objections, website data (including online account details, IP address and browser generated information)
Claimant	
Contact Details	Name, address, telephone number, email address
Identification Information	Identity card number, passport number, work permit number
Financial	Bank account details used for payment



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Anti-fraud Data	Address, history of fraudulent claims, details of incident giving rise to claim
Business Partners and Visitors	
Contact Details	Name, work address, work email, work telephone numbers, job title
Marketing	Name, job title, email address, interests / marketing list assignments, record of permissions or marketing objections, website data (including online account details, IP address and browser generated information)
Office Visitor	Name, job title, email address, telephone number, CCTV images, dietary preferences (for events), disability data (voluntarily provided)

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	<ul style="list-style-type: none"> Contact Details Identification Information Policy Information Personal Risk Information 	<ul style="list-style-type: none"> Performance of a contract Legitimate interests (to ensure we have an accurate record of all Insured Persons we cover) 	<ul style="list-style-type: none"> Service Providers
Carry out background, sanction and fraud checks	<ul style="list-style-type: none"> Contact Details Identification Information Personal Risk Information 	<ul style="list-style-type: none"> Legitimate interests (to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud) Local law exemption 	<ul style="list-style-type: none"> Service Providers Anti-fraud databases
Consider the underwriting submission, assess risk and write policy	<ul style="list-style-type: none"> Personal Risk Information Health Data 	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Third party administrators Other insurers/reinsurers Service providers

		specifically asked for it, your consent	
Manage renewals	<ul style="list-style-type: none"> • Contact Details • Identification Information • Policy Information • Personal Risk Information • Health Data 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (to determine whether to extend cover for a renewal period, and if so, on what terms) • If we have specifically asked for it, your consent 	<ul style="list-style-type: none"> • Third Party Administrators • Service Providers
Provide client care, assistance and support	<ul style="list-style-type: none"> • Contact Details • Policy Information 	<ul style="list-style-type: none"> • Performance of a contract 	<ul style="list-style-type: none"> • Assistance Providers • Service Providers
Receive premiums and payments	<ul style="list-style-type: none"> • Contact Details • Financial Information 	<ul style="list-style-type: none"> • Performance of a contract 	<ul style="list-style-type: none"> • Banks
Marketing	<ul style="list-style-type: none"> • Contact Details • Financial Information 	<ul style="list-style-type: none"> • Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest) • Consent 	<ul style="list-style-type: none"> • Service Providers
Comply with legal and regulatory	<ul style="list-style-type: none"> • Contact Details • Identification 	<ul style="list-style-type: none"> • Legal obligation 	<ul style="list-style-type: none"> • Regulators (eg OIC)

obligations	<p>Information</p> <ul style="list-style-type: none"> • Policy Information • Personal Risk Information • Financial Information 		<ul style="list-style-type: none"> • Law enforcement bodies • Courts • Other insurers (under court order)
Claimant			
Receive notification of claim	<ul style="list-style-type: none"> • Contact Details • Identification Information • Policy Information • Claim Details 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (to maintain an accurate record of all claims received and the identity of claimants) 	<ul style="list-style-type: none"> • Third Party Administrators • Assistance Providers • Service Providers
Assess claim	<ul style="list-style-type: none"> • Claim Details • Health Data 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (to assess circumstances of a claim) • If we have specifically asked for it, your consent • Establish, exercise or defend legal claim 	<ul style="list-style-type: none"> • Third Party Administrators • Loss Adjusters • Lawyers • Claims Experts
Monitor and detect fraud	<ul style="list-style-type: none"> • Claim Details • Anti-fraud Data 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate 	<ul style="list-style-type: none"> • Anti-fraud databases • Law

		<p>interests (to monitor, assess and ultimately prevent fraud)</p> <ul style="list-style-type: none"> • If we have specifically asked for it, your consent • Establish, exercise or defend legal claims 	<p>enforcement bodies</p>
Settle claim	<ul style="list-style-type: none"> • Financial Information 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (to settle claims to successful third party claimants) 	<ul style="list-style-type: none"> • Banks • Lawyers
Comply with legal and regulatory obligations	<ul style="list-style-type: none"> • Policy Information • Claim Details • Anti-fraud Data • Financial Information 	<ul style="list-style-type: none"> • Legal obligation 	<ul style="list-style-type: none"> • Regulators (eg OIC) • Law enforcement bodies • Courts • Other insurers (under court order)
Business Partners and Visitors			
Manage relationships	<ul style="list-style-type: none"> • Contact Details 	<ul style="list-style-type: none"> • Legitimate interests (to maintain an accurate client and partner relationship management platform) 	<ul style="list-style-type: none"> • Service Providers

Administer contracts	<ul style="list-style-type: none"> Contact Details 	<ul style="list-style-type: none"> Performance of a contract 	<ul style="list-style-type: none"> Service Providers
Marketing	<ul style="list-style-type: none"> Contact Details Marketing 	<ul style="list-style-type: none"> Legitimate interests (to communicate to Business Partners about events, services or products which may be of interest to their sector) Consent 	<ul style="list-style-type: none"> Service Providers
Run events and host office visitors; accommodate website visitors	<ul style="list-style-type: none"> Website or Office Visitors 	<ul style="list-style-type: none"> Legitimate interests (to organize and host events which may be of interest to Business Partners) Consent 	<ul style="list-style-type: none"> Service Providers
Applicable to all			
Transfer of books of business	<ul style="list-style-type: none"> All (where relevant to the book) 	<ul style="list-style-type: none"> Legitimate interests (to structure our business appropriately) Legal obligation Consent 	<ul style="list-style-type: none"> Courts Purchaser Professional advisers
Sale or reorganization of a ACE company	<ul style="list-style-type: none"> All 	<ul style="list-style-type: none"> Legitimate interests (to structure our business appropriately) Legal obligation 	<ul style="list-style-type: none"> Courts Purchaser Professional advisers

		<ul style="list-style-type: none"> • Consent 	
Recording of telephone calls	<ul style="list-style-type: none"> • Contact Details • Identification Information • Claims Details • Other information shared in the context of the call 	<ul style="list-style-type: none"> • 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) 	<ul style="list-style-type: none"> • Service Providers • Regulators • Courts • Law enforcement bodies