## Chubb Privacy

## CHUBB

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

Provide client care, assistance and support Receive premiums and payments	<ul> <li>Contact Details</li> <li>Policy Information</li> <li>Contact Details</li> <li>Financial Information</li> </ul>	<ul> <li>period, and if so, on what terms)</li> <li>If we have not asked for your consent, the 'insurance purposes' exemption</li> <li>If we have specifically asked for it, your consent</li> <li>Performance of a contract</li> <li>Conditional consent</li> <li>Performance of a contract</li> </ul>	<ul> <li>Assistance Providers</li> <li>Service Providers</li> <li>Banks</li> </ul>
Marketing	<ul><li>Contact Details</li><li>Marketing</li></ul>	<ul> <li>Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest)</li> <li>Consent</li> </ul>	• Services Providers
Comply with legal and regulatory obligations	<ul> <li>Contact Details</li> <li>Policy Information</li> <li>Personal Risk Information</li> <li>Financial Information</li> </ul>	Legal Obligation	<ul> <li>Regulators (e.g. FCA, PRA, ICO)</li> <li>Law enforcement bodies</li> <li>Courts</li> <li>Other Insurers (under court</li> </ul>
			order)
Activity	Type of information collected	The basis on which we use the information	order) Who we may disclose the information to
<b>Activity</b> Claimant			Who we may disclose the
			Who we may disclose the

Monitor and detect fraud	• A	laim Details nti-fraud Data	<ul> <li>Performance of a contract</li> <li>Legitimate interests (to monitor, assess and ultimately prevent fraud)</li> <li>If we have not asked for your consent, the 'insurance purposes' exemption</li> <li>If we have specifically asked for it, your consent</li> <li>'Preventing fraud' exemption</li> <li>Establish, exercise or defend legal claims</li> </ul>	
Settle Claim		inancial Information	<ul> <li>Performance of a contract</li> <li>Legitimate interests (third party claimants) (to settle claims to successful third party claimants)</li> </ul>	<ul><li>Banks</li><li>Solicitors</li></ul>
Comply with legal and regulatory obligations	• C	olicy Information laim Details nti-fraud Data inancial Information	Legal obligation	<ul> <li>Regulators (e.g. FCA, PRA, ICO)</li> <li>Law enforcement bodies</li> <li>Courts</li> <li>Other Insurers (under court order)</li> </ul>
		Type of	The basis on which we	Who we may
Activity	iı	nformation collected	use the information	e disclose the information to
Activity Business Partners and Vi		nformation collected	l <u></u>	information to
	sitors	nformation collected	• Legitimate interests (to maintain an accurate client and partner relationship management platform)	
Business Partners and Vi	sitors • C	nformation collected	<ul> <li>Legitimate interests (to maintain an accurate client and partner relationship management platform)</li> <li>Consent</li> <li>Performance of a</li> </ul>	information to
Business Partners and Vi Manage relationships	sitors • C • C	nformation collected	<ul> <li>Legitimate interests (to maintain an accurate client and partner relationship management platform)</li> <li>Consent</li> </ul>	information to

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	<b>All</b> (where relevant to the book)	<ul> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation (insurance transfer scheme under applicable law)</li> <li>The 'insurance purposes' exemption</li> </ul>	<ul> <li>Courts</li> <li>Purchaser</li> <li>Professional advisors</li> </ul>
Sale or organisation of • a Chubb company	All	<ul> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation (insurance transfer scheme under applicable law)</li> <li>Consent</li> <li>The 'insurance purposes' exemption</li> </ul>	<ul> <li>Purchaser</li> <li>Professional advisors</li> </ul>
Recording of telephone calls	Contact Details; Claim Details; Other information shared in the context of the call	<ul> <li>Legal obligation</li> <li>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)</li> </ul>	<ul> <li>Service Providers</li> <li>Regulators</li> <li>Courts</li> <li>Law Enforcement Agencies</li> </ul>

Updated November 2019