

3 Policyholders and Beneficiaries

What personal data do we collect about you?

We collect and process the following information about you in connection with your insurance policy. We set out below the relevant categories of information and examples of the types of personal data collected and processed:

- **ID and Contact information**
 - Name
 - Address
 - Contact details
 - ID numbers
 - National insurance number, social security number, tax identification number or other government-issued identifier
 - Date of birth
 - Nationality
 - Marital status
 - Gender
- **Financial information**
 - Payment card details
 - Credit history
 - Bankruptcies, court judgments or tax authority investigations Details from anti-financial crime databases and sanctions lists
- **Employment information**

- Occupation
 - Employer
 - Employment history
- **Policy and claims information**
 - Quotes received
 - Insurance policies taken out
 - Claims history
 - Details of property insured (for example, vehicle registration numbers)
 - Details of other persons named on the policy, such as the policyholder and their relationship to you

In addition to the above categories of personal data, we may also collect and use certain types of sensitive details such as information about your health (including any vulnerabilities) which are relevant to your insurance policy with us and any criminal convictions you have. Depending on the nature of your insurance policy, we may also collect information relating to your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, genetic or biometric data, or data concerning your sex life or sexual orientation. We refer to such data as "special category data" throughout this Notice.

Where do we collect this personal data from?

We collect this information directly from you when you apply for or renew an insurance policy with us, we provide you with a quote, you make a claim or complaint, or you otherwise contact us (including by telephone or via an online meeting, where a recording may be made).

We may also collect this information from a variety of other sources, including:

- the policyholder (where this is not you);

- intermediaries, such as brokers;
- our service providers and business partners, such as claims handlers, loss adjusters, and administrators;
- credit reference agencies;
- anti-fraud and crime prevention databases;
- government agencies and regulatory bodies;
- insurance industry bodies (such as the Employers' Liability Tracing Office and the Association of British Insurers or equivalent industry bodies, bureaux and claims registers in the other countries in which we operate);;
- other members of the Chaucer group of companies;
- your representatives; and
- publicly available sources (such as the electoral roll and court judgments).

How do we use your personal data?

We are committed to collecting and using personal data in accordance with applicable data protection laws.

Wherever we collect or use your personal data, we will make sure we do this for a valid legal reason. The primary lawful grounds we rely upon are:

- **Performance of a contract:** The processing of your personal data is necessary in order to enter into a contract of insurance with you or for us to perform an insurance policy that we hold with you.
- **Legitimate interests:** The processing of your personal data is necessary for our legitimate interests, such as managing your insurance policy, business administration and operation, product improvement, risk management, and maintaining accurate records. Where we rely upon legitimate interests, we have ensured that our business needs do not interfere with your rights and freedoms or cause you undue detriment.

- **Legal obligation:** The processing of your personal data is necessary for us to comply with our legal or regulatory obligations.

We can only collect and use special category data provided at least one of the following additional limited conditions is present:

- **Insurance purposes:** We need this data for insurance purposes, including to arrange, underwrite, manage, or exercise rights / comply with obligations in relation to our contract of insurance with you, and handle claims, and there is a substantial public interest in such processing.
- **Preventing or detecting unlawful acts:** We require this data to prevent, investigate or detect unlawful activity, including fraud, and there is a substantial public interest in such processing.
- **Suspicion of terrorist financing or money laundering:** The use of data is necessary for the purposes of making a disclosure in respect of suspected terrorist financing or money laundering.
- **Establishing, exercising or defending legal claims:** The use of this data is necessary for the purposes of establishing, exercising or defending our legal rights.
- **Safeguarding individuals at risk:** The use of this data is necessary to an individual at risk, and there is a substantial public interest in such processing.
- **Safeguarding economic wellbeing:** The use of this data is necessary to safeguard the economic wellbeing of an individual at risk, and there is a substantial public interest in such processing.
- **Preventing fraud:** The use of data is necessary for preventing fraud and certain other criteria are met.
- **Consent:** You have explicitly consented to the processing of your data.

We set out below in further detail our purposes for collecting and processing your personal data and the legal grounds relied upon:

Purpose of processing your personal data	Category of personal data processed	Legal ground for processing personal data	Additional condition for processing special category data (where applicable)
To arrange and administer a quote and / or application for an insurance policy	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legitimate interests: to manage the insurance application and quotation process, and evaluate your application	Insurance purpose Safeguarding individuals at risk Safeguarding economic wellbeing Consent
To assess and price the risks to be insured and determine any appropriate premium for you	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legitimate interests: to manage your insurance application and determine any premiums	Insurance purpose Safeguarding individuals at risk Safeguarding economic wellbeing Consent

To conduct legally required sanctions, fraud, credit and anti-money laundering checks	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legal obligation Legitimate interests: to prevent fraud and financial crime	Insurance purpose Preventing or detecting unlawful acts Suspicion of terrorist financing or money laundering Establishing, exercising or defending legal claims Consent
To enter into a contract of insurance, and manage and administer your insurance policy (including collecting premiums, assessing mid-term adjustments and renewals, and processing cancellations)	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legitimate interests: to administer your insurance policy	Insurance purpose Safeguarding individuals at risk Safeguarding economic wellbeing Consent

To investigate and handle claims	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legitimate interests: to assess your claim, determine coverage, make any payments, and manage the claims process	Insurance purpose Establishing, exercising or defending legal claims Safeguarding individuals at risk Safeguarding economic wellbeing Consent
To communicate with you and investigate and respond to complaints	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legal obligation Legitimate interests: to ensure effective investigation and resolution of complaints	Insurance purpose Establishing, exercising or defending legal claims Safeguarding individuals at risk Safeguarding economic wellbeing Consent

To prevent, detect and investigate crime and fraud	ID and contact information Financial information Employment information Policy and claims information Special category data	Performance of a contract Legitimate interests: to investigate, prevent and detect crime and fraud	Insurance purposes Establishing, exercising or defending legal claims Preventing or detecting unlawful acts Preventing fraud
To establish, enforce and defend our legal rights, including our right to pursue or defend litigation	Individual information Financial information Employment information Policy and claims information Special category data	Legitimate interests: to establish, enforce and defend our legal rights to protect our business, employees and customers	Insurance purposes Establishing, exercising or defending legal claims Preventing or detecting unlawful acts Preventing fraud
To comply with our legal and regulatory obligations	ID and contact information Financial information Employment information	Legal obligation	Insurance purposes

	Policy and claims information Special category data	Legitimate interests: to comply with our legal and regulatory obligations (including where a foreign legal or regulatory obligation is involved)	Establishing, exercising or defending legal claims Preventing or detecting unlawful acts Preventing fraud Safeguarding individuals at risk Safeguarding economic wellbeing
To manage our business operations and administration, including maintaining records	ID and contact information Financial information Employment information Policy and claims information Special category data	Legitimate interests: to effectively administer and operate our business, and to protect our business, employees and customers	Insurance purposes Establishing, exercising or defending legal claims Preventing or detecting unlawful acts

To develop and improve our products and services	ID and contact information Financial information Employment information Policy and claims information Special category data	Legitimate interests: to develop and improve our products to ensure we remain competitive and meet our customers' needs	Insurance purposes Consent
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Who do we share your personal data with?

Where necessary in order to fulfil the purposes set out in the table above, your personal data may be shared with selected / relevant third parties. These third parties include:

- brokers, reinsurers, loss adjusters, claims handlers and other organisations involved in the insurance lifecycle;
- our service providers such as financial advisers, lawyers, accountants, auditors, and our IT suppliers;
- law enforcement, credit reference and debt collection agencies, and fraud detection and sanctions checking agencies;
- insurance industry bodies (such as the Employers' Liability Tracing Office and the Association of British Insurers or and equivalent industry bodies, bureaux and claims registers in the other countries in which we operate);
- other members of the Chaucer group of companies;
- agents or representatives acting on your behalf; and
- regulatory authorities such as the Financial Conduct Authority, Financial Ombudsman Service, the UK Information Commissioner's Office, or any country specific data protection authorities

