

6 Witnesses

This section is relevant for individuals who have witnessed an incident which is the subject of a claim under one of our insurance policies.

What personal data do we collect about you?

We collect and process the following information about you in connection with the incident you witnessed. We set out below the relevant categories of information and, where relevant, examples of the types of personal data collected and processed:

- **ID and contact information**
 - Name
 - Address
 - Contact details
 - Date of birth
 - Gender
- **Information related to the incident that you witnessed**

Generally we will not collect and process sensitive details such as information about your health or any criminal convictions (referred to throughout this Notice as special category data) unless it is provided by you or relevant to your witness account.

Where do we collect this personal data from?

We collect this information directly from you when investigating the claim 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:

- third parties relevant to your claim, such as the claimant, the defendant, other insurers, other witnesses, claims handlers, loss adjusters, and experts;
- intermediaries, such as brokers;
- 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:

- **Legitimate interests:** The processing of your personal data is necessary for our legitimate interests, such as investigating incidents relating to a claim, 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 one of the following additional limited conditions is present:

- **Consent:** You have explicitly consented to the processing of your data.

- **Insurance purposes:** We need this data for insurance purposes, including to 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.
- **Establishing, exercising or defending legal claims:** The use of this data is necessary for the purposes of establishing, exercising or defending our legal rights.

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 investigate and handle claims	ID and contact information Information related to the incident that you witnessed Special category data (where relevant)	Legitimate interests: to assess your claim, determine coverage, make any payments, and manage the claims process	Insurance purpose Legal rights Consent
To prevent, detect and investigate crime and fraud	ID and contact information Information related to the incident that you witnessed Special category data (where relevant)	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 comply with our legal and regulatory obligations	ID and contact information Information related to the incident that you witnessed Special category data (where relevant)	Legal obligation Legitimate interests: to comply with our legal and regulatory obligations (including where a foreign legal or regulatory obligation is involved)	Insurance purposes 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 Information related to the incident that you witnessed Special category data (where relevant)	Legitimate interests: to effectively administer and operate our business, and to protect our	Insurance purposes Establishing, exercising or

		business, employees and customers	defending legal claims Preventing or detecting unlawful acts
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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:

- other insurers related to the claim / incident you witnessed;
- 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, fraud detection agencies, and insurance industry databases;
- insurance industry bodies (such as the Employers' Liability Tracing Office and the Association of British Insurers, 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 and the Information Commissioner's Office.

