

Information & Privacy Notice



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Introduction

The Purpose Of This Notice

This document will provide you with an understanding as to what kind of information we collect in connection with our products and services and how we will process and use this information. We describe how we collect, use, share, retain and safeguard **personal data**.

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to arrange **insurance** contracts some information, including your **personal data**, needs to be shared between different **insurance market participants**. This Notice is designed to help you understand how **insurance market participants** process your **personal data** throughout the [insurance lifecycle](#).

This Notice also sets out your **Individual Rights** in relation to your **personal data**, which includes your entitlement to know what data is held about you, how this data is processed, and how you can place restrictions on the use of your data. You can exercise your rights by contacting us using the details set out in the [How To Contact Us](#) section.

Definitions

- *We, us* or *our* refers to not only Hallett Independent Ltd. as an **insurance intermediary**, yet to all relevant **insurance market participants**.
- *You* or *your* refers to the individual whose **personal data** (may be / is being) processed by an **insurance market participant**. *You* is a term that may refer to the **policyholder, beneficiary, claimant** or other person involved in a claim.
- Other terms in **bold** hold specific meanings. Those meanings can be found in the [Glossary](#).

Key Details

Hallett Independent Limited is authorised and regulated by the Financial Conduct Authority (FCA).

Our Financial Services Register number is: 310908.

Our Registered Office is: Asset House, 7-9 Quay Street Lymington SO41 3AS (Company No 04407168).

Policy Revision date: May 2018

The Data We May Collect About You

Personal data is information relating to an identified or identifiable natural person. In order for us to arrange **insurance** quotes, administer **insurance** policies, or handle any claims or complaints, we will need to collect and process **personal data** about you. We may also collect your **personal data** where you request information about our services and products, events, or campaigns.

We may need to additionally collect **personal data** relating to others in order to arrange and administer your **insurance**. In most circumstances, you will provide us with this information. Where you disclose the **personal data** of others, you must ensure you are entitled to do so.

The types of **personal data** that are processed, either directly by Hallett Independent and/or by authorised third parties with whom we conduct our business activities, may include:

TYPES OF PERSONAL DATA	DETAILS
Individual Details	Name, address, other contact details (e.g. email and telephone numbers), gender, marital status, age and/or date of birth, nationality, employer, job title and employment history, qualifications, and family details (e.g. named family members and their relationship to you). Administration details, such as allocated passwords to access sensitive electronic documents, may also be stored.
Identification Details	Identification numbers issued by government bodies or agencies (e.g. national insurance number, passport number, tax identification number, and driving license reference). Online identifiers (e.g. IP addresses and cookies).
Financial Information	Bank account or payment card details, income or other financial information.
Risk Details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your physical or mental health, details of criminal convictions or offences, or other special categories of personal data .
Policy Information	Information about the quotes you receive and policies you take out.
Anti-Fraud Data	Credit history, credit score, financial sanctions and criminal offences, and information received from various anti-fraud databases relating to you.
Previous and Current Claims	Information about historic and existing claims (including under other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data .
Special Categories of Personal Data	Certain categories of personal data have additional safeguards and protection under the GDPR . These categories are health, criminal convictions and offences, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to sexual orientation.

Collecting your Personal Data

Data Sources

You might provide us with **personal data** when completing online quote or contact forms, when you contact us via the telephone, when writing to us directly by email or postal correspondence, or where you return a completed proposal form, declaration, or similar document in relation to your **insurance**.

We will collect your **personal data** when you visit our website, where we will collect your unique online electronic identifier; this is commonly known as an IP address. We may employ website analytics to automatically gather certain statistical information such as the number and frequency of visitors and their IP addresses. This information helps us to measure how individuals use the website and our services, so that we can continually improve them.

We will also collect electronic **personal data** when you first visit our website and may place a small file via your web browser, commonly known as a cookie, on your local computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating and using features of our website. Cookies contain information that can be later read by a web server in the domain that had issued the cookie to you, yet cannot be used to run programs or deliver viruses to your computer.

We may additionally collect your **personal data** from various sources, including:

- Your family members, employer, colleagues or representative;
- Other **insurance market participants**;
- Credit reference agencies;
- Anti-fraud databases, sanctions lists, court judgements and other databases;
- Government agencies such as the DVLA and HMRC;
- Public databases such as the electoral register and Companies House;
- Pre-populated account and contact details as a result of interacting with our social media profiles; or
- In the event of a claim, third parties including the other party to the claim (**claimant** / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers.

Which of the above sources shall apply will depend on your particular circumstances.

Data Protection

We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data both within our firm and with authorised third parties.

To ensure data privacy and protection has appropriate focus within our organisation, any communications to enact requests of **Individual Rights** are reportable to our Managing Director.

How The Insurance Market Works

Identities of Data Controllers and Data Processors

The **insurance lifecycle** involves the sharing of your **personal data** between **insurance market participants**, some of which you will not have direct contact with. In addition, your **personal data** may not have been collected directly by an **insurance market participant**. This is normal practice within the **insurance** industry where it is necessary to share information in order to place, quantify and underwrite risks, to assess overall risk exposure, and to process claims. It is also necessary in order to determine the **premium** payable and to administer our business.

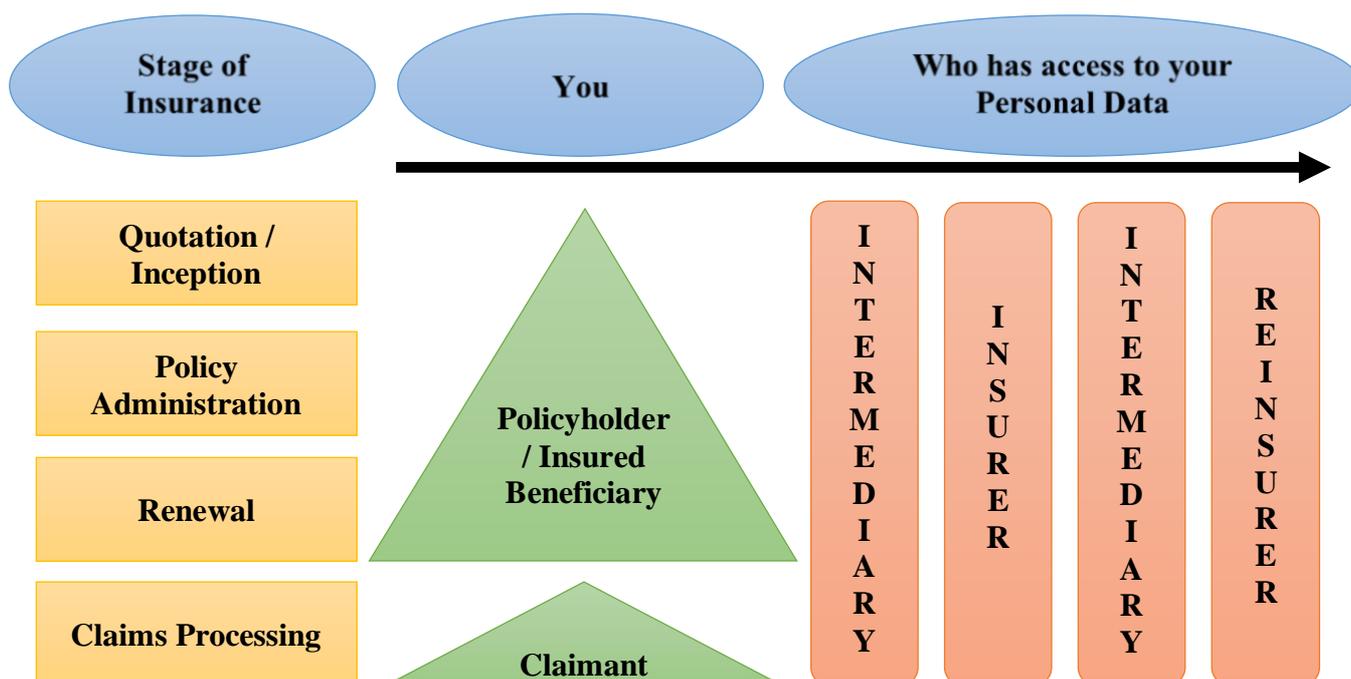
Where Hallett Independent Ltd. collects data directly from you, we are considered to be the controller of that data (i.e. a **data controller**). Where third parties are used to process your data, these parties are known as **data processors** of your **personal data**. Where there are other parties involved in underwriting or administering your **insurance** (e.g. an **Insurer**), they may also process your data as a joint **data controller** of your **personal data**.

Given the mechanisms by which the insurance market operates, with reinsurance often taking place after the initial policy has been underwritten and the possibility of claims payments, it is not possible to identify which **insurance market participant(s)** will receive the data during the **insurance lifecycle**. Upon request, Hallett Independent Ltd. may inform you as to which other **data controllers** it has disclosed any of your **personal data**; and if that identified third party has further disclosed your **personal data** then they in turn must separately address any such request.

Flows Of Personal Data Through The Insurance Lifecycle

We will share **personal data** with authorised third parties; where we are required to do so by law, where we need to administer our business (to quote for, source, place, and administrate your **insurance**), to perform underwriting activities, to process claims or handle complaints, and for the arrangement of insurance premium finance.

These authorised third parties may include; **Insurers**, Underwriters, Premium finance providers, Credit reference agencies, Debt recovery agencies, Claims handling companies, Loss adjusters, Surveyors, Insurance brokers, **Reinsurers**, and Regulators. The **insurance lifecycle** is depicted below:



Our Purposes, Categories, Legal Grounds And Recipients

We set out below the various purposes for which Hallett Independent Ltd. as an **intermediary**, and other **insurance market participants**, might use your **personal data**. Each listed *Purpose* below specifies the nature of activities involved, and the corresponding *Categories*, *Legal Grounds* and *Recipients* are as further detailed under the [Personal Data Processing Table](#):

- *Purpose*: The activities under which **personal data** is necessary for its intended purpose.
- *Categories*: The type of **personal data** being collected and processed.
- *Recipients*: Whether any **personal data** may be disclosed to third parties or other **insurance market participant(s)**.
- *Legal Grounds*: The specified legal grounds under **GDPR** for processing that **personal data**.

Purposes In Relation To Your Personal Data

Quotation / Inception:

- Setting you up as a client, including fraud, credit, anti-money laundering, and sanctions checks;
- Evaluating the risks to be covered and determining an appropriate policy and its **premium**;
- Collecting, refunding and transferring of **premium**.

Policy Administration:

- General client care, including communicating with you and the processing of updates in relation to the **insurance policy**;
- Collecting, refunding and transferring of **premium**.

Claims Processing:

- Managing **insurance** claims, including fraud, credit, anti-money laundering, and sanctions checks;
- Defending or prosecuting legal claims;
- Investigation or prosecuting fraud.

Renewals:

- Contacting the **insured/policyholder** to invite **renewal** of the **insurance policy**;
- Reevaluating the risks to be covered and determining suitability of the policy and its **premium**;
- Collecting, refunding and transferring of **premium**.

Other purposes outside of the insurance lifestyle:

- Complying with our legal or regulatory obligations;
- General risk modelling and underwriting;
- Transferring books of business, company sales & reorganisations;
- Contacting the **insured/policyholder** to inform or notify in respect of **insurance**-related news or events;
- Arranging insurance premium finance;
- Inviting contact and the offering of our services and products by means of marketing campaigns;
- Handling of complaints or general enquiries.

Please note that in addition to the disclosures we have identified against each purpose, we may also disclose **personal data** for those same purposes to our service providers, contractors, or agents that perform activities on our behalf.

How We Manage Consent

Hallett Independent Ltd. will obtain **personal data** only by lawful and fair means. If you contact us for a quote or request details on the services and products we provide, we consider these communications as forming a legitimate business interest and permission to provide you with further information about our services and activities. In purchasing our products and services you should understand that you are forming a contract with us.

In order to provide **insurance** cover and deal with **insurance** claims, in certain circumstances **insurance market participants** may also need to process your **special categories of personal data**, such as medical and criminal conviction records, as set out against the relevant purpose (refer to the [Personal Data Processing Table](#)). Where such processing may be necessary for an **insurance market participant**, this will be deemed necessary for the performance of our contract and for reasons of substantial public interest. This allows us to quote for and provide you with **insurance** products and services, to process claims and **renewals**, and to administer your policy.

In some situations we may request your consent to market our products and services to you, or to share and transfer your data outside the European Economic Area (EEA). Where we require explicit consent, your rights and what you are consenting to will be clearly communicated to you.

Where consent for a specified purpose is given, you may withdraw your consent to such processing at any time. However, should you withdraw your consent, this will impact upon and/or terminate our ability to provide our **insurance** services or process claims.

Profiling And Automatic Decision Making

When calculating insurance premiums **insurance market participants** may compare your **personal data** against industry averages. Your **personal data** may also be used to create industry averages going forwards. This is known as profiling and is used to ensure **premiums** reflect risk within the insurance market.

Profiling tools may also be used by **insurance market participants** to assess information you provide to understand fraud patterns. Where **special categories of personal data** are relevant (e.g. medical history or criminal convictions), your **special categories of personal data** may also be used for profiling purposes.

Insurance market participants might make some decisions based on profiling techniques without staff intervention (known as Automatic Decision Making). **Insurance market participants** should provide details of any automated decision making they undertake in their information notices (i.e. its purpose, the consequences, and any facility available to you to enquire or exercise your right to object to the use of profiling activities).

International Transfers

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of **personal data** takes place.

We may need to transfer your data to **insurance market participants** or their affiliates or sub-contractors which are located outside of the EEA. International transfers would always be made in compliance with the **GDPR**. This is necessary for the purposes of administering our business, for underwriting, and for claims processing purposes. Authorised third parties are not permitted to use your **personal data** for any other purpose than for what has been agreed with us. These parties are also required to safeguard your **personal data** through the use of appropriate technical and organisational data security measures and are prohibited from disclosing or sharing your data with other third parties without our prior authorisation, or unless required to do so by law.

Retention Of Your Personal Data

We will keep your **personal data** only for so long as is necessary and for the purpose for which it was collected. The retention of data is necessary where required for contractual, legal or regulatory purposes, or for our legitimate business interests in relation to statistical analysis, product development, and marketing purposes.

Owing to the nature of **insurance** contracts we may need to retain your **personal data** beyond the expiry of your **insurances** or termination of your relationship with us in order for us to respond to legal disputes, process claim occurrences, or as required by law and our regulatory obligations.

Where you have enquired into the details of our services and products, requested an **insurance** policy **quotation**, or have otherwise actively communicated with us, we will retain your **personal data** for a period of 2 years.

We will retain your **personal data** following the termination of our services (e.g. expiry date of the last contract of **insurance** arranged through and handled by us) for a period of 7 years.

Where you make a complaint, we will retain the data for 7 years.

Where you have submitted a claim, we will retain your data for a period of 7 years.

Your Rights Under GDPR

Individuals are provided with legal rights governing the use of their **personal data**, known as **Individual Rights** under the Data Protection Act 2018. Individuals can exercise their **Individual Rights** at any time.

Under certain conditions you may have;

- The **right to be informed** about your **personal data** we collect, store and process;
- The **right of access** to be aware of and to verify the **personal data** we hold about you;
- The **right to object** to the processing of your **personal data** based on the grounds of **legitimate interests**, unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- The **right to restrict** the processing of your **personal data**;
- The **right to rectification** of your **personal data** to update any inaccuracies of **personal data** held;
- The **right to erasure** of your **personal data** where we no longer have a lawful basis to use or retain;
- The **right to data portability** (to move, copy or transfer **personal data** from one IT environment to another by a safe and secure means);
- The **right to withdraw** consent to cease the processing of **personal data** whereupon explicit consent had been given;
- Rights relating to automated decision making and profiling.

In exercising your **Individual Rights**, you should understand that in some situations we may be unable to fully meet your request (e.g. the right to erasure may not be enforced where there are requirements to retain data for taxation, prevention of crime, or for regulatory and other statutory purposes).

In certain circumstances, we may need to restrict the exercising of **Individual Rights** in order to safeguard the public interest (e.g. the prevention or detection of crime) or our interests (e.g. the maintenance of legal privilege). In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of **personal data** throughout the **insurance lifecycle** is complex and we ask you to keep this in mind when exercising your right of access to your information. Where we may be reliant on other organisations to help satisfy your request this may impact on timescales. As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

Crucially, you must also be aware that if you object to the collection, sharing, retention or use of your **personal data** we may be unable to continue providing you with our products and services.

Your Right To Complain To The ICO

If you are not satisfied with our use of your **personal data** or our response to any request by you to exercise any of your **Individual Rights** as they are applicable under **GDPR**, or if you think that we are in breach of an aspect of the **GDPR**, then you have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office (**ICO**).

Please see below for contact details of the **ICO** across the UK.

Website address: <https://ico.org.uk/concerns/>

England	Scotland
Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF	Information Commissioner's Office 45 Melville Street, Edinburgh, EH3 7HL
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)	Tel: 0131 244 9001
Email: casework@ico.org.uk	Email: scotland@ico.org.uk

Wales	Northern Ireland
Information Commissioner's Office 2nd floor - Churchill House, Churchill way, Cardiff CF10 2HH	Information Commissioner's Office, 3rd Floor - 14 Cromac Place, Belfast, BT7 2JB
Tel: 029 2067 8400	Tel: 0303 123 1114 (local rate) or 028 9027 8757 (national rate)
Email: wales@ico.org.uk	Email: ni@ico.org.uk

How To Contact Us

If you have any questions regarding this Notice or in relation to our use of your **personal data**, or should you wish to enact any of your **Individual Rights** as they may be applicable under **GDPR**, please contact us by the following means:

In writing: Hallett Independent Ltd., Asset House, 7-9 Quay Street, Lymington, Hampshire SO41 3AS

By phone: +44 (0)1590 672888

By email: enquiries@hallettindependent.com

Appendix 1 – Glossary

<i>Beneficiary</i>	An individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the insured/policyholder and there may be more than one beneficiary under an insurance policy .
<i>Claimant</i>	Either a beneficiary who is making a claim under an insurance policy or an individual or a company who is making a claim against a beneficiary where that claim is covered by the insurance policy .
<i>Claims processing</i>	The process of handling a claim that is made under an insurance policy .
<i>Data Controller</i>	The individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data .
<i>Data Processor</i>	The individual or organisation which processes personal data on behalf of the controller.
<i>Quotation</i>	The process of providing a quote to a potential insured/policyholder for an insurance policy .
<i>Inception</i>	The specified date and time upon which an insurance policy starts.
<i>Individual Rights</i>	Individuals are provided with legal rights governing the use of their personal data, known as Individual Rights, which they may exercise at any time. Further details may be found on the ICO website: https://ico.org.uk/for-the-public/
<i>Insurance</i>	The pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression insurance may also mean reinsurance.
<i>Insurance policy</i>	A contract of insurance between the insurer and the insured/policyholder .
<i>Insurance market participant(s) or participants</i>	An intermediary, insurer or reinsurer .
<i>Insured / Policyholder</i>	The individual or company in whose name the insurance policy is issued. A potential insured/policyholder may approach an intermediary to purchase an insurance policy or they may approach an insurer directly or via a price comparison website.
<i>Insurers</i>	Often referred to in the context of the term ‘underwriters’, an insurer provides insurance cover to insured/policyholders in return for premium . An insurer may also be a reinsurer .
<i>Intermediary</i>	Also typically known as brokers, insurance intermediaries assist policyholders and insurers in arranging insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through intermediaries.
<i>Legal obligation</i>	Processing deemed necessary for our compliance with a legal obligation to which we are subject.
<i>Legitimate interests</i>	Described activates whereby processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by you fundamental rights and freedoms which require protection of personal information.
<i>Performance of contract</i>	Processing deemed necessary for the performance of a contract to which you are party to, or in order to undertake steps at your request prior to entering into a contract.

<i>Personal Data</i>	Any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person.
<i>Policy administration</i>	The process of administering and managing an insurance policy following its inception .
<i>Premium</i>	The amount of money to be paid by the insured/policyholder to the insurer in the insurance policy .
<i>Reinsurers</i>	Provide insurance cover to another insurer or reinsurer. That insurance is known as reinsurance, and is arranged without the knowledge of the insured/policyholder holding that insurance policy .
<i>Renewal</i>	The process of the insurer under an insurance policy providing a quotation to the insured/policyholder for a new insurance policy to replace the existing one on its expiry.

Appendix 2 – Personal Data Processing Table

PURPOSE	INTERMEDIARY			INSURER (and REINSURER where marked with an *)		
	Categories of Data	Legal Grounds	Disclosures	Categories of Data	Legal Grounds	Disclosures
Quotation / Inception						
Setting you up as a client, including fraud, credit, anti-money laundering, and sanctions checks	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • Credit reference agencies • Anti-fraud databases 	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • Credit reference agencies • Anti-fraud databases • Group companies providing administration
	<ul style="list-style-type: none"> • Individual details • Identification details • Financial Information 	<ul style="list-style-type: none"> • Performance of contract • Compliance with a legal obligation • Legitimate interests (to ensure that the client is within our acceptable risk profile) • To assist with the prevention of crime and fraud 		<ul style="list-style-type: none"> • Individual details • Identification details • Financial Information 	<ul style="list-style-type: none"> • Performance of contract • Compliance with a legal obligation • Legitimate interests (to ensure that the client is within our acceptable risk profile) 	
	<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>		<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>	
	<ul style="list-style-type: none"> • Credit and anti-fraud data 	<ul style="list-style-type: none"> • In the substantial public interest • Consent 		<ul style="list-style-type: none"> • Credit and anti-fraud data 	<ul style="list-style-type: none"> • In the substantial public interest • Consent 	
Evaluating the risks to be covered and determining an appropriate policy and its premium	<i>Personal Data</i>	<i>Personal Data</i>		<i>Personal Data</i>	<i>Personal Data</i>	
	<ul style="list-style-type: none"> • Individual details • Identification details • Policy Information 	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to determine the likely risk profile and appropriate insurer and insurance product) 		<ul style="list-style-type: none"> • Individual details * • Identification details • Policy Information * 	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium) * 	
	<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>		<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>	
	<ul style="list-style-type: none"> • Credit and anti-fraud data • Previous claims • Risk details 	<ul style="list-style-type: none"> • In the substantial public interest • Consent 		<ul style="list-style-type: none"> • Credit and anti-fraud data • Previous claims * • Risk details 	<ul style="list-style-type: none"> • In the substantial public interest • Consent * 	
Collecting, refunding and transferring of premium	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • Banks 	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • Banks
	<ul style="list-style-type: none"> • Individual details • Identification details • Policy Information 	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to recover debts due to insurance market participants) 		<ul style="list-style-type: none"> • Individual details • Financial Information 	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to recover debts due to insurance market participants) 	

PURPOSE	INTERMEDIARY			INSURER and REINSURER (as marked with *)		
	Categories of Data	Legal Grounds	Disclosures	Categories of Data	Legal Grounds	Disclosures
Policy Administration						
General client care, including communicating with you and the processing of updates in relation to the insurance policy	<i>Personal Data</i> <ul style="list-style-type: none"> Individual details Policy Information 	<i>Personal Data</i> <ul style="list-style-type: none"> Performance of contract Legitimate interests (to correspond with clients, beneficiaries and claimants, in order to facilitate the placing of and claims under insurance policies) Consent 		<i>Personal Data</i> <ul style="list-style-type: none"> Individual details Policy Information 	<i>Personal Data</i> <ul style="list-style-type: none"> Performance of contract Legitimate interests (to correspond with clients, beneficiaries and claimants, in order to facilitate the placing of and claims under insurance policies) 	
	<i>Special Categories of Personal Data</i> <ul style="list-style-type: none"> Risk details Previous claims Current claims 	<i>Special Categories of Personal Data</i> <ul style="list-style-type: none"> Performance of contract Consent 		<i>Special Categories of Personal Data</i> <ul style="list-style-type: none"> Risk details Previous claims Current claims 	<i>Special Categories of Personal Data</i> <ul style="list-style-type: none"> Performance of contract Consent 	
Collecting, refunding and transferring of premium	<i>Personal Data</i> <ul style="list-style-type: none"> Individual details Identification details Policy Information 	<i>Personal Data</i> <ul style="list-style-type: none"> Performance of contract Legitimate interests (to recover debts due to insurance market participants) 	<ul style="list-style-type: none"> Banks 	<i>Personal Data</i> <ul style="list-style-type: none"> Individual details Financial Information 	<i>Personal Data</i> <ul style="list-style-type: none"> Performance of contract Legitimate interests (to recover debts due to insurance market participants) 	<ul style="list-style-type: none"> Banks

PURPOSE	INTERMEDIARY			INSURER and REINSURER (as marked with *)		
	Categories of Data	Legal Grounds	Disclosures	Categories of Data	Legal Grounds	Disclosures
Claims Processing						
Managing insurance claims, including fraud, credit, anti-money laundering, and sanctions checks	<i>Personal Data</i> <ul style="list-style-type: none"> Individual details Identification details Financial Information Policy Information 	<i>Personal Data</i> <ul style="list-style-type: none"> Performance of contract Legitimate interests (to assist our clients in assessing and making claims) 	<ul style="list-style-type: none"> Claims handlers Solicitors Loss adjustors Experts 	<i>Personal Data</i> <ul style="list-style-type: none"> Individual details * Identification details Financial Information Policy Information * 	<i>Personal Data</i> <ul style="list-style-type: none"> Performance of contract Legitimate interests (to assess the veracity and quantum of claims) * 	<ul style="list-style-type: none"> Claims handlers Solicitors * Loss adjustors * Experts *

	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Legal claims 	<ul style="list-style-type: none"> • Third parties involved in the claim 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Credit and anti-fraud data * • Risk details * • Previous claims * • Current claims * 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent * • Legal claims * 	<ul style="list-style-type: none"> • Third parties involved in the claim
Defending or prosecuting legal claims	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial Information • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to assist in assessing and processing claims) 	<ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial Information • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to defend or pursue claims) 	<ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim
	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Legal claims 		<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Legal claims 	
Investigation or prosecuting fraud	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial Information • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to assist with the prevention and detection of fraud) 	<ul style="list-style-type: none"> • Solicitors • Private Investigators • Police • Experts • Third parties involved in the investigation or prosecution • Other Insurers • Anti-fraud databases 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial Information • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to assist with the prevention and detection of fraud) 	<ul style="list-style-type: none"> • Solicitors • Private Investigators • Police • Experts • Third parties involved in the investigation or prosecution • Other Insurers • Anti-fraud databases
	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Health data • Criminal records data • Other sensitive data • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Legal claims • Substantial Public Interest 		<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Health data • Criminal records data • Other sensitive data • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Legal claims • Substantial Public Interest 	

PURPOSE	INTERMEDIARY			INSURER and REINSURER (as marked with *)		
	Categories of Data	Legal Grounds	Disclosures	Categories of Data	Legal Grounds	Disclosures
Renewals						
Contacting the insured/policyholder to invite renewal of the insurance policy	<i>Personal Data</i>	<i>Personal Data</i>		<i>Personal Data</i>	<i>Personal Data</i>	
	<ul style="list-style-type: none"> Individual details Policy information 	<ul style="list-style-type: none"> Performance of contract Legitimate interests (to correspond with clients, beneficiaries and claimants, in order to facilitate the placing of and claims under insurance policies) Consent 		<ul style="list-style-type: none"> Individual details Policy information 	<ul style="list-style-type: none"> Performance of contract Legitimate interests (to correspond with clients, beneficiaries and claimants, in order to facilitate the placing of and claims under insurance policies) 	
	<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>		<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>	
	<ul style="list-style-type: none"> Risk details Previous claims Current claims 	<ul style="list-style-type: none"> Performance of contract Consent 		<ul style="list-style-type: none"> Risk details Previous claim Current claims 	<ul style="list-style-type: none"> Performance of contract Consent 	
Reevaluating the risks to be covered and determining suitability of the policy and its premium	<i>Personal Data</i>	<i>Personal Data</i>		<i>Personal Data</i>	<i>Personal Data</i>	
	<ul style="list-style-type: none"> Individual details Identification details Policy Information 	<ul style="list-style-type: none"> Performance of contract Legitimate interests (to determine the likely risk profile and appropriate insurer and insurance product) 		<ul style="list-style-type: none"> Individual details * Identification details Policy Information * 	<ul style="list-style-type: none"> Performance of contract Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium) * 	
	<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>		<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>	
	<ul style="list-style-type: none"> Credit and anti-fraud data Previous claims Risk details 	<ul style="list-style-type: none"> Performance of contract Consent 		<ul style="list-style-type: none"> Credit and anti-fraud data Previous claims * Risk details 	<ul style="list-style-type: none"> Performance of contract Consent * 	
Collecting, refunding and transferring of premium	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> Banks 	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> Banks
	<ul style="list-style-type: none"> Individual details Identification details Policy Information 	<ul style="list-style-type: none"> Performance of contract Legitimate interests (to recover debts due to insurance market participants) 		<ul style="list-style-type: none"> Individual details Financial Information 	<ul style="list-style-type: none"> Performance of contract Legitimate interests (to recover debts due to insurance market participants) 	

PURPOSE	INTERMEDIARY			INSURER and REINSURER (as marked with *)		
	Categories of Data	Legal Grounds	Disclosures	Categories of Data	Legal Grounds	Disclosures
Other purposes outside of the insurance lifestyle						
Complying with our legal or regulatory obligations	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • PRA, FCA, ICO and other regulators • Police • Other Insurers (under court order) • Insurance Fraud database 	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • PRA, FCA, ICO and other regulators * • Police • Other Insurers (under court order)
	<ul style="list-style-type: none"> • Individual details • Identification details • Policy Information • Financial information • Marketing data 	<ul style="list-style-type: none"> • Legal obligation 		<ul style="list-style-type: none"> • Individual details * • Identification details • Policy Information * • Financial information 	<ul style="list-style-type: none"> • Legal obligation * 	
General risk modelling and underwriting	<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>		<i>Special Categories of Personal Data</i>	<i>Special Categories of Personal Data</i>	
	<ul style="list-style-type: none"> • Credit and anti-fraud data • Previous claims • Current claims • Risk details 	<ul style="list-style-type: none"> • Consent • Substantial public interest 		<ul style="list-style-type: none"> • Credit and anti-fraud data • Previous claims * • Current claims * • Risk details 	<ul style="list-style-type: none"> • Consent * • Substantial public interest * 	
Transferring books of business, company sales & reorganisations	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • Courts • Purchaser 	<i>Personal Data</i>	<i>Personal Data</i>	<ul style="list-style-type: none"> • Courts * • Purchaser *
	<ul style="list-style-type: none"> • Individual details • Identification details • Policy Information • Financial information • Marketing data 	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests (to structure our business appropriately) 		<ul style="list-style-type: none"> • Individual details * • Identification details • Policy Information * • Financial information 	<ul style="list-style-type: none"> • Legal obligation * • Legitimate interests (to structure our business appropriately) * 	

	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Previous claims • Current claims • Risk details 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Substantial public interest 		<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Previous claims * • Current claims * • Risk details 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent * • Substantial public interest * 	
<p>Contacting the insured/policyholder to inform or notify in respect of insurance-related news or events</p>	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Legitimate interests (to ensure policyholders are made aware of industry or noteworthy changes which may impact upon their insurance cover, or to inform of events/activities within reasonable expectations) • Consent 		<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Legitimate interests (to ensure policyholders are made aware of industry or noteworthy changes which may impact upon their insurance cover) • Consent 	
<p>Arranging insurance premium finance</p>	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Policy Information • Financial information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Performance of contract • Legitimate interests (to provide policyholders with insurance premium finance options upon request) 	<ul style="list-style-type: none"> • Premium Finance Companies 			
<p>Inviting contact and the offering of our services and products by means of marketing campaigns</p>	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Marketing data 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Consent 				
<p>Handling of complaints or general enquiries</p>	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details • Identification details • Policy Information 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Legal obligation • Legitimate interests (to correspond with clients, beneficiaries and claimants, in order to address direct and indirect enquiries in relation to our products and services) 	<ul style="list-style-type: none"> • Third parties involved in the complaint • PRA, FCA, ICO and other regulators 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Individual details * • Identification details • Policy Information * 	<p><i>Personal Data</i></p> <ul style="list-style-type: none"> • Legal obligation * 	<ul style="list-style-type: none"> • Third parties involved in the complaint * • PRA, FCA, ICO and other regulators *

	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Previous claims • Current claims • Risk details 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent • Substantial public interest 		<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Previous claims * • Current claims * 	<p><i>Special Categories of Personal Data</i></p> <ul style="list-style-type: none"> • Consent * • Substantial public interest * 	
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Appendix 3 – Our Legal Grounds

LEGAL GROUNDS	DETAILS
FOR PROCESSING PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA	
Performance of contract	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
Protection of vital interests of you or another person	Processing is necessary in order to protect the vital interests of you or of another natural person.
In the public interest	Processing is necessary for the performance of a task carried out in the public interest.
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose.
FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA	
Your explicit consent (optional)	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent by contacting our Data Protection Contact.
Your explicit consent (necessary)	You have given your explicit consent to the processing of those personal data for one or more specified purposes, where we are unable to procure, provide or administer insurance cover without this consent. You are free to withdraw your consent by contacting our Data Protection Contact. However withdrawal of this consent will impact upon and/or terminate our ability to provide insurance or pay claims.
Protection of vital interests of you or another person, where you are unable to consent	Processing is necessary to protect the vital interests of you or of another natural person where you are physically or legally incapable of giving consent.
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
In the substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or UK law.
For health services	Processing is necessary for the purposes of preventive or occupational medicine, for medical diagnosis, the provision of health or social care or treatment on the basis of EU or UK law or pursuant to contract with a health professional who is under legal or professional obligations of secrecy.