

Chubb Privacy

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 Personal Risk Information Policy 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, fraud and credit checks | <ul style="list-style-type: none"> Contact Details Personal Risk Information Criminal Data | <ul style="list-style-type: none"> Consent Legitimate interests (to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud) Legal obligation Explicit consent, as a lawful exemption (for Criminal Data) | <ul style="list-style-type: none"> Service Providers Credit reference agencies Anti-fraud databases |
| Consider the underwriting submission, assess risk and write policy | <ul style="list-style-type: none"> Personal Risk Information Health Data Criminal 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) Consent Explicit Consent, as a lawful exemption (for Criminal Data) Local law exemptions | <ul style="list-style-type: none"> Third Party Administrators Other Insurers / Reinsurers |
| Manage renewals | <ul style="list-style-type: none"> Contact Details Policy Information Personal Risk Information Health Data Criminal 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) | <ul style="list-style-type: none"> Third Party Administrators Service Providers |

| | | <ul style="list-style-type: none"> • Consent • Explicit Consent as a lawful exemption (<i>for Criminal Data</i>) • Local Law exemptions | |
|---|---|---|--|
| 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 • Consent • Local law exemptions (<i>for Policy Information</i>) • Explicit consent (<i>for Policy Information</i>) | <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 • Marketing | <ul style="list-style-type: none"> • Legitimate interests (<i>to provide Insured Persons with information about insurance products or services which may be of interest</i>) • Consent | <ul style="list-style-type: none"> • Services Providers |
| Comply with legal and regulatory obligations | <ul style="list-style-type: none"> • Contact Details • Policy Information • Personal Risk Information • Financial Information | <ul style="list-style-type: none"> • Legal Obligation | <ul style="list-style-type: none"> • Regulators (<i>e.g. CBI, DPC</i>) • Law enforcement bodies • Courts • Other Insurers (<i>under court order</i>) |
| Activity | Type of information collected | The basis on which we use the information | Who we may disclose the information to |
| Claimant | | | |
| Receive notification of claim | <ul style="list-style-type: none"> • Policy Information • Claim Details | <ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (<i>third party claimants</i>) (<i>to maintain an accurate record of all claims received and the identity of claimants</i>) | <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 • Criminal Data | <ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (<i>to assess the circumstances of a claim</i>) • Consent • Establish, exercise or defend legal claims • Explicit consent as a lawful exemption (<i>for Criminal Data</i>) • Local law exemptions | <ul style="list-style-type: none"> • Third Party Administrators • Loss Adjusters • Solicitors • 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 interests (<i>to monitor, assess and ultimately prevent fraud</i>) • Consent • Local law exemptions • Explicit consent, as lawful exemption (<i>for Criminal Data</i>) • Establish, exercise or defend legal claims | <ul style="list-style-type: none"> • Surveillance providers (<i>exceptionally</i>) • Anti-fraud database • Law enforcement bodies |
|--|---|---|--|
| Settle Claim | <ul style="list-style-type: none"> • Financial Information | <ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (<i>third party claimants</i>) (<i>to settle claims to successful third party claimants</i>) • Explicit consent, as lawful exemption (<i>for Criminal Data included in Claim Details or Anti-fraud Data</i>) | <ul style="list-style-type: none"> • Banks • Solicitors |
| 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 (<i>e.g. CBI, DPC</i>) • Law enforcement bodies • Courts • Other Insurers (<i>under court order</i>) |
| Activity | Type of information collected | The basis on which we use the information | Who we may disclose the information to |
| Business Partners and Visitors | | | |
| Manage relationships | <ul style="list-style-type: none"> • Contact Details | <ul style="list-style-type: none"> • Legitimate interests (<i>to maintain an accurate client and partner relationship management platform</i>) • Consent | <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 | |
| Marketing | <ul style="list-style-type: none"> • Contact Details • Marketing | <ul style="list-style-type: none"> • Legitimate interests (<i>to communicate to Business Partners about events, services or products which may be of interest to their sector</i>) • 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 Visitor | <ul style="list-style-type: none"> • Legitimate interests (<i>to organise and host events which may</i> | <ul style="list-style-type: none"> • Service Providers |

be of interest to Business Partners)

- Consent

| 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 | <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 (insurance transfer scheme under applicable law) • Consent | <ul style="list-style-type: none"> • Courts • Purchaser • Professional advisors |
| Sale or organisation of a Chubb company | <ul style="list-style-type: none"> • All | <ul style="list-style-type: none"> • Legitimate interests (to structure our business appropriately) • Legal obligation (insurance transfer scheme under applicable law) • Consent | <ul style="list-style-type: none"> • Purchaser • Professional advisors |
| Recording of telephone calls | <ul style="list-style-type: none"> • Contact Details; • Claim 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 Agencies |

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