

# 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
<b>Prospective Insureds and Insured Persons</b>			
Set up a record on our systems	<ul style="list-style-type: none"> <li>Contact Details</li> <li>Personal Risk Information</li> <li>Policy Information</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract</li> <li>Legitimate interests (to ensure we have an accurate record of all Insured Persons we cover)</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
Carry out background, sanction, fraud and credit checks	<ul style="list-style-type: none"> <li>Contact Details</li> <li>Personal Risk Information</li> <li><u>Criminal Data</u></li> </ul>	<ul style="list-style-type: none"> <li>Conditional 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><u>Legal obligation</u></li> </ul>	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <li>Personal Risk Information</li> <li><u>Health Data</u></li> <li><u>Criminal Data</u></li> </ul>	<ul style="list-style-type: none"> <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><u>Consent</u></li> <li><u>Local law exemptions</u></li> </ul>	<ul style="list-style-type: none"> <li>Third Party Administrators</li> <li>Other Insurers / Reinsurers</li> </ul>



Manage renewals	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Policy Information</li> <li>• Personal Risk Information</li> <li>• <u>Health Data</u></li> <li>• <u>Criminal Data</u></li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate Interests (to determine whether to extend cover for a renewal period, and if so, on what terms)</li> <li>• <u>Consent</u></li> <li>• <u>Local law exemptions</u></li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Administrators</li> <li>• Service Providers</li> </ul>
Provide client care, assistance and support	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Policy Information</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Conditional consent</li> </ul>	<ul style="list-style-type: none"> <li>• Assistance Providers</li> <li>• Service Providers</li> </ul>
Receive premiums and payments	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	<ul style="list-style-type: none"> <li>• Banks</li> </ul>
Marketing	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest)</li> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
Comply with legal and regulatory obligations	<ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Policy Information</li> <li>• Personal Risk Information</li> <li>• Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Regulators (e.g. Country DPA, Country FSA)</li> <li>• Law enforcement bodies</li> <li>• Courts</li> <li>• Other Insurers (under court order)</li> </ul>
<b>Claimant</b>			
Receive notification of claim	<ul style="list-style-type: none"> <li>• Policy Information</li> <li>• Claim Details</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (<i>third party claimants</i>) (to maintain an accurate record of</li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Administrators</li> <li>• Assistance providers</li> <li>• Service providers</li> </ul>



		all claims received and the identity of claimants)	
Assess claim	<ul style="list-style-type: none"> <li>• Claim Details</li> <li>• <u>Health Data</u></li> <li>• <u>Criminal Data</u></li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (to assess the circumstances of a claim)</li> <li>• <u>Consent</u></li> <li>• <u>Local law exemptions</u></li> <li>• <u>Establish, exercise or defend legal claims</u></li> </ul>	<ul style="list-style-type: none"> <li>• Third Party Administrators</li> <li>• Loss Adjusters</li> <li>• Solicitors</li> <li>• Claims Experts</li> </ul>
Monitor and detect fraud	<ul style="list-style-type: none"> <li>• Claim Details</li> <li>• <u>Anti-fraud Data</u></li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (to monitor, assess and ultimately prevent fraud)</li> <li>• <u>Consent</u></li> <li>• <u>Local law exemptions</u></li> <li>• <u>Establish, exercise or defend legal claims</u></li> </ul>	<ul style="list-style-type: none"> <li>• Surveillance providers (exceptionally)</li> <li>• Anti-fraud database</li> <li>• Law enforcement bodies</li> </ul>
Settle claim	<ul style="list-style-type: none"> <li>• Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (<i>third party claimants</i>) (to settle claims to successful third party claimants)</li> </ul>	<ul style="list-style-type: none"> <li>• Banks</li> <li>• Solicitors</li> </ul>
Comply with legal and regulatory obligations	<ul style="list-style-type: none"> <li>• Policy Information</li> <li>• Claim Details</li> <li>• Anti-fraud Data</li> <li>• Financial Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Regulators (e.g. Country DPA, Country FSA)</li> <li>• Law enforcement bodies</li> <li>• Courts</li> <li>• Other Insurers (under court order)</li> </ul>



<b>Business Partners and Visitors</b>			
Manage relationships	<ul style="list-style-type: none"> <li>Contact Details</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to maintain an accurate client and partner relationship management platform)</li> <li>Consent</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
Administer contracts	<ul style="list-style-type: none"> <li>Contact Details</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract</li> </ul>	
Marketing	<ul style="list-style-type: none"> <li>Contact Details</li> <li>Marketing</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to communicate to Business Partners about events, services or products which may be of interest to their sector)</li> <li>Consent</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
Run events and host office visitors; accommodate website visitors	<ul style="list-style-type: none"> <li>Website or Office Visitor</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to organise and host events which may be of interest to Business Partners)</li> <li>Consent</li> </ul>	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
<b>Applicable to all</b>			
Transfer books of business	<ul style="list-style-type: none"> <li><b>All</b> (<i>where relevant to the book</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation (<i>under a Part VII transfer</i>)</li> <li><u>Consent</u></li> </ul>	<ul style="list-style-type: none"> <li>Courts</li> <li>Purchaser</li> <li>Professional advisors</li> </ul>
Sale or reorganisation of a Chubb company	<ul style="list-style-type: none"> <li><b>All</b></li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation (<i>under a Part VII transfer</i>)</li> <li><u>Consent</u></li> </ul>	<ul style="list-style-type: none"> <li>Courts</li> <li>Purchaser</li> <li>Professional advisors</li> </ul>