

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"> Conditional consent Legitimate interests (to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud) Local law exemption 	<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) If we have not asked for your consent, the 'insurance purposes' exemption If we have specifically asked for it, your consent 	<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) • If we have not asked for your consent, the 'insurance purposes' exemption • If we have specifically asked for it, your consent 	<ul style="list-style-type: none"> • Third Party Administrators • Service Providers
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 • Conditional consent 	<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 (to provide Insured Persons with information about insurance products or services which may be of interest) • Consent 	<ul style="list-style-type: none"> • Service 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 (e.g. FCA, PRA, ICO) • Law enforcement bodies • Courts • Other Insurers (under court order)

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>) (to maintain an accurate record of all claims received and the identity of claimants) 	<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 (to assess the circumstances of a claim) • If we have not asked for your consent, the 'insurance purposes' exemption • If we have specifically asked for it, your consent • Establish, exercise or defend legal claims 	<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 (to monitor, assess and ultimately prevent fraud) • If we have not asked for your consent, the 'insurance purposes' exemption • 'Preventing fraud' exemption • If we have specifically asked for it, your consent 	<ul style="list-style-type: none"> • Surveillance providers (<i>exceptionally</i>) • Anti-fraud databases • Law enforcement bodies

		<ul style="list-style-type: none"> Establish, exercise or defend legal claims 	
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>) (to settle claims to successful third party claimants) 	<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 (e.g. FCA, PRA, ICO) Law enforcement bodies Courts Other Insurers (under court order)
Business Partners and Visitors			
Manage relationships	<ul style="list-style-type: none"> Contact Details 	<ul style="list-style-type: none"> Legitimate interests (to maintain an accurate client and partner relationship management platform) 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 (to communicate to Business Partners about events, services or products which may be of interest to their sector) 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 (to organise and host events which may be of interest to Business Partners) Consent 	<ul style="list-style-type: none"> Service Providers
Applicable to all			
Transfer books of business	<ul style="list-style-type: none"> All (<i>where relevant to the book</i>) 	<ul style="list-style-type: none"> Legitimate interests (to structure our business appropriately) Legal obligation (<i>under a Part VII transfer</i>) Consent The 'insurance purposes' exemption 	<ul style="list-style-type: none"> Courts Purchaser Professional advisors
Sale or reorganisation 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 (<i>under a Part VII transfer</i>) Consent The 'insurance purposes' exemption 	<ul style="list-style-type: none"> Courts Purchaser Professional advisors