DATA PROTECTION

INSURANCE MARKET CORE USES INFORMATION NOTICE

31 May 2018

BIBA

LIIBA
London & International Insurance Brokers' Association

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LANDING PAGE

INSURANCE MARKET INFORMATION NOTICE

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your **personal data**, needs to be shared between different **insurance market participants** [link: glossary definition]. The insurance market is committed to safeguarding that information.

This notice is designed to help you understand how the **insurance market participants** process your **personal data** through the **insurance lifecycle** [link to insurance lifecycle diagram].

This notice may be updated from time to time: this version is dated 25 May 2018 and historic versions are archived [here - link].

Insurance market participants may link to, or refer to, this notice from their own information notices or consent wordings [and this notice should be read in conjunction with the participant's own information notice.]

In this notice:

we, us or **our** refers to the relevant **insurance market participant** [link to diagram with policyholder, insurer, broker, reinsurer];

you or **your**, refers to the individual whose **personal data** [may be/is being] processed by an **insurance market participant** (**you** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy).

There are other terms in **bold** with specific meanings. Those meanings can be found [here] [link: Glossary].

This notice sets out the following: [Note: each of the 11 sections below is a link that can be clicked through to].

1 – INTRODUCTION – HOW THE INSURANCE MARKET WORKS

2 – THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

3 – WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4 – IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

5 – THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

6 – CONSENT

7 – PROFILING

8 – RETENTION OF YOUR PERSONAL DATA

9 – INTERNATIONAL TRANSFERS

10 – YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

11 – GLOSSARY OF KEY TERMS

[APPENDIX 1 - THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA – This sits under section 5 and is converted into a dynamic list of purposes that opens up if you click on a purpose and gives an option of which Participant's processing you want to review. Mark to suggest how to amalgamate certain purposes.]
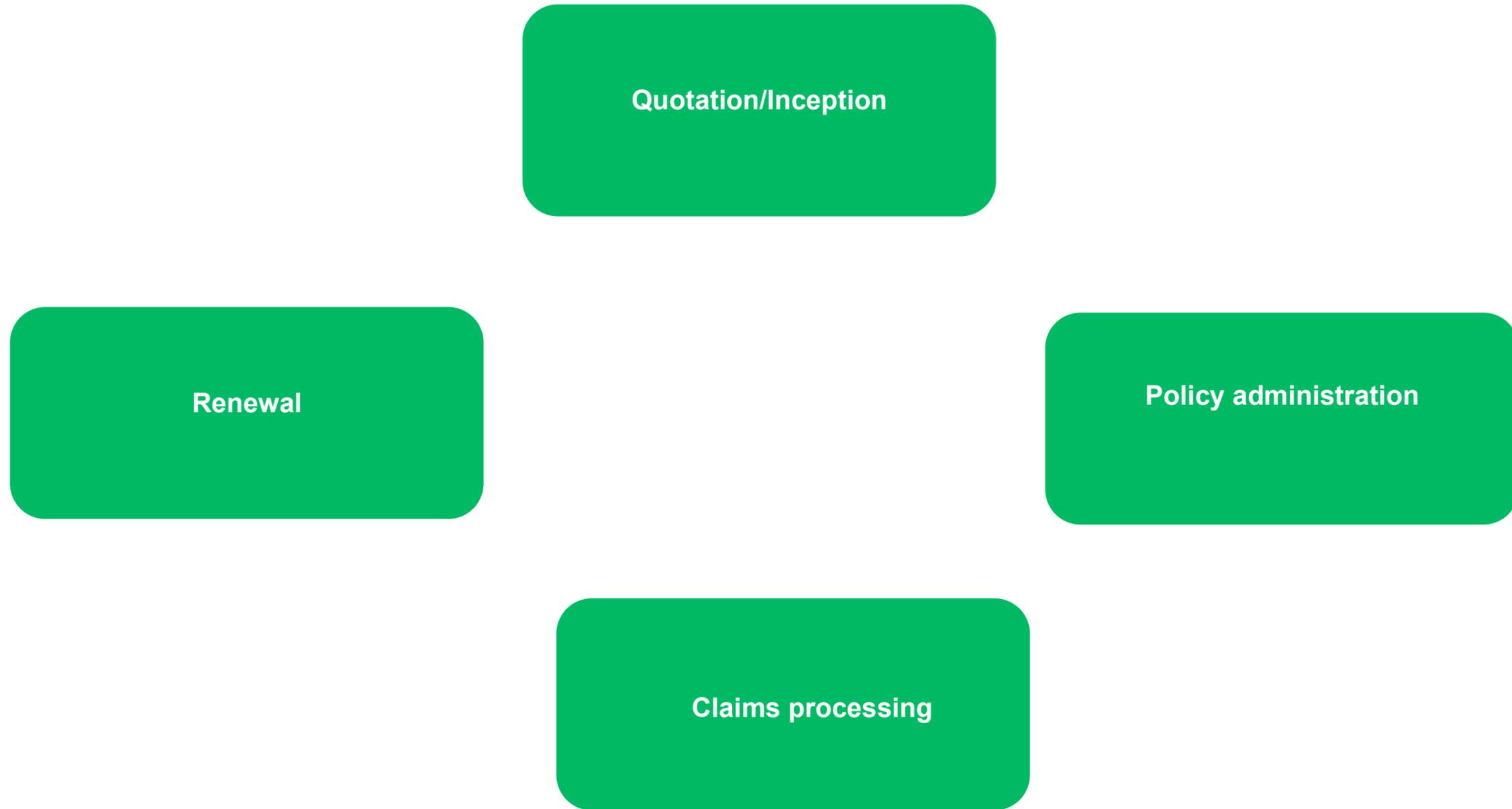
[APPENDIX 2 – CONTACT DETAILS OF THE INFORMATION COMMISSIONER'S OFFICE (ICO) – this sits under section 10]

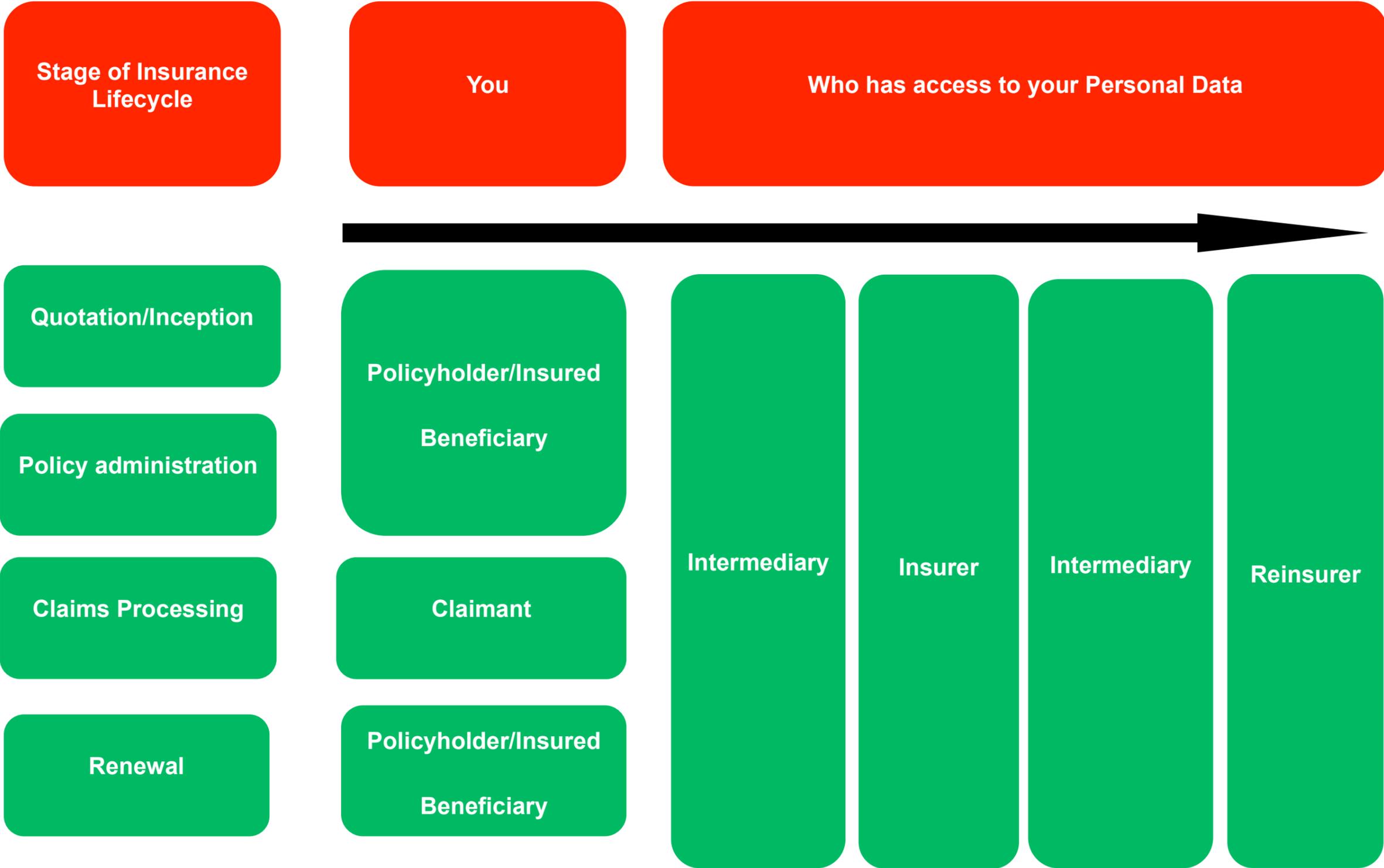**[APPENDIX 3 – LIST OF THE LEGAL GROUNDS WE RELY ON – This is just available through a link]**

How the insurance market works: [note: these definitions will also appear when you hover over the participant in the diagram]

INSURANCE LIFECYCLE

Quotation/Inception

Renewal

Policy administration

Claims processing

FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE

Stage of Insurance Lifecycle	You	Who has access to your Personal Data			
Quotation/Inception	Policyholder/Insured Beneficiary	Intermediary	Insurer	Intermediary	Reinsurer
Policy administration					
Claims Processing	Claimant				
Renewal	Policyholder/Insured Beneficiary				

SECTION 2   THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

In order for **us** to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, **we** need to collect and process personal data about **you**.   The types of personal data that are processed may include:

Types of Personal Data	Details
Individual details ▶	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to **you**
Identification details ▶	Identification numbers issued by government bodies or agencies, including **your** national insurance number, passport number, tax identification number and driving licence number
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** health, criminal convictions, or other **special categories of personal data.** For certain types of policy, this could also include **telematics data**.
Policy information ▶	Information about the quotes **you** receive and policies **you** take out
Credit and anti-fraud data ▶	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to **you**
Previous and current claims ▶	Information about previous and current claims, (including other unrelated insurances),which may include data relating to **your** health, criminal convictions, or other **special categories of personal data** and in some cases, surveillance reports
Special categories of personal data▶	Certain categories of **personal data** which have additional protection under the **GDPR**. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

SECTION 3   WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

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

- **you**;
- **your** family members, employer 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;
- open electoral register; 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 apply will depend on **your** particular circumstances.

SECTION 4   IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

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**.

You can find out the identity of the initial **data controller** of **your personal data** within the insurance market life-cycle in the following ways:

- *Where you took out the insurance policy yourself:* the **insurer** and, if purchased through an **intermediary**, the **intermediary** will be the initial **data controller** and their **data protection contact** can advise **you** on the identities of other **insurance market participants** that they have passed your **personal data** to.

- *Where your employer or another organisation took out the policy for your benefit:* **you** should contact **your** employer or the organisation that took out the policy who should provide **you** with details of the **insurer** or **intermediary** that they provided **your personal data** to and **you** should contact their **data protection contact** who can advise **you** on the identities of other **insurance market participants** that they have passed **your personal data** to

- *Where you are not a policyholder or an insured:* **you** should contact the organisation that collected **your personal data** who should provide **you** with details of the relevant **participant's data protection contact**.

SECTION 5 THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We set out below the purposes **insurance market participants** might use **your personal data** for. If you click on a purpose you can see:

• If that type of **insurance market participant** uses **your personal data** for that particular purpose
• The categories of **personal data** it collects
• What **personal data** it might provide to third parties (disclosures).
• The legal grounds for processing that **personal data**. Those legal grounds are set out in the **GDPR**.

Purposes

Quotation/Inception:
    - Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
    - Evaluating the risks to be covered and matching to appropriate policy/ premium
    - Payment of premium where the insured/policyholder is an individual

Policy administration:
    - Client care, including communicating with you and sending you updates
    - Payments to and from individuals

Claims Processing:
    - Managing insurance and reinsurance claims
    - Defending or prosecuting legal claims
    - Investigation or prosecuting fraud

Renewals:
    - Contacting the insured/policyholder to renew the insurance policy
    - Evaluating the risks to be covered and matching to appropriate policy/ premium
    - Payment of premium where the insured/policyholder is an individual

Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:
    - Complying with our legal or regulatory obligations
    - General risk modelling
    - Transferring books of business, company sales & reorganisations

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

SECTION 6 CONSENT

In order to provide insurance cover and deal with insurance claims in certain circumstances **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing may be necessary for the insurance market participant to achieve this.

If you have provided your consent but want to withdraw it, you may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

SECTION 7 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 the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk.

Profiling 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, such as medical history for life insurance or past motoring convictions for motor insurance, **your special categories of personal data** may also be used for profiling.

Insurance market participants might make some decisions based on profiling and without staff intervention (known as automatic decision making). **Insurance market participants** will provide details of any automated decision making they undertake without staff intervention in their information notices [and upon request] including:

- where they use such automated decision making

- the logic involved

- the consequences of the automated decision making

- any facility for **you** to have the logic explained to **you** and to submit further information so the decision may be reconsidered.

SECTION 8   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 originally collected. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under this insurance, or where **we** are required to keep **your personal data** due to legal or regulatory reasons.

SECTION 9   INTERNATIONAL TRANSFERS

We may need to transfer **your** data to **insurance market participants** or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact the **data protection contact** of the relevant **participant**.

SECTION 10   YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

If you have any questions in relation to **our** use of **your personal data**, you should first contact the **data protection contact** of the relevant **participant**. Under certain conditions, you may have the right to require **us** to:

- provide **you** with further details on the use **we** make of **your personal data/special category of data**;
- provide **you** with a copy of the **personal data** that **you** have provided to **us**;
- update any inaccuracies in the **personal data we** hold;
- delete any **special category of data/personal data** that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights; and
- restrict how **we** use **your personal data** whilst a complaint is being investigated.

In certain circumstances, **we** may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege).

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** rights in SECTION 10, or if **you** think that we have breached the **GDPR**, then **you** have the right to complain to the **ICO**. Please see below for contact details of the **ICO**.

England	Scotland	Wales	Northern Ireland
Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL	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: 0303 123 1113 (local rate) or 01625 545 745 (national rate)	Tel: 0131 244 9001	Tel:029 2067 8400	Tel: 0303 123 1114 (local rate) or 028 9027 8757 (national rate)
Email: casework@ico.org.uk	Email: scotland@ico.org.uk	Email: wales@ico.org.uk	Email: ni@ico.org.uk

SECTION 11: GLOSSARY

Key insurance terms:

Beneficiary is 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**

Claimant is 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**

Claims processing is the process of handling a claim that is made under an insurance policy

Quotation is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**

Inception is when the **insurance policy** starts

Insurance is 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**

Insurance policy is a contract of insurance between the **insurer** and the **insured**/**policyholder**

Insurance market participant(s) *or* ***participants****:* is an **intermediary**, **insurer** or **reinsurer**

Insured/policyholder is 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.

Insurers*:* (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium.** An **insurer** may also be a **reinsurer.**

Intermediaries help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**

Lloyd's*:* many policies are underwritten in Lloyd's of London. Lloyd's is a specialist insurance market place. To find out more about how Lloyd's operates click here

Policy administration is the process of administering and managing an **insurance policy** following its **inception**

Premium is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**

Reinsurers provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance

Renewal is 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

We, us or ***our*** refers to the relevant **insurance market participant** [link to diagram with policyholder, insurer, broker, reinsurer].

You or ***your*** refers to the individual whose **personal data** may be processed by an **insurance market participant. You** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an **insurance policy**

Key data protection terms:

GDPR*:* is the EU General Data Protection Regulation and the new UK Data Protection Act, which replaces the UK Data Protection Act 1998 from 25 May 2018.

Data controller*:* is an entity which collects and holds personal data. It decides what **personal data** it collects about **you** and how that **personal data** is used. Any of the **insurance market participants** when using **your personal data** for the purposes set out in Section 5 could be **data controllers**.

Data protection contact: the person named by the relevant **insurance market participant** who **you** should contact if **you** have any queries or requests regarding your personal **data** or how **we** are using it. In many cases (although not all), this person will be the Data Protection Officer of the relevant **insurance market participant**.

Information Commissioner's Office (ICO) – is the regulator (or National Competent Authority/Data Protection Authority) for data protection matters in the UK.

Personal data*:* is any data from which **you** can be identified and which relates to **you**. It may include data about any claims **you** make.

Processing of personal data*:* includes collecting, using, storing, disclosing or erasing your **personal data**.

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
QUOTATION/INCEPTION **Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks**	**Personal data:** • Individual details • Identification details • Financial information	**Personal data:** • Performance of our contract with you • 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	• Credit reference agencies • Anti-fraud databases	**Personal data:** • Individual details • Identification details • Financial information	**Personal data:** • Performance of our contract with you • Compliance with a legal obligation • Legitimate interests (to ensure that the client is within our acceptable risk profile)	• Group companies providing administration • Credit reference agencies • Anti-fraud databases			
	Special categories of personal data: • Credit and anti-fraud data	**Special categories of personal data:** • In the substantial public interest (insurance purpose) • Consent		**Special categories of personal data:** • Credit and anti-fraud data	**Special categories of personal data:** • In the substantial public interest (insurance purpose) • Consent				
QUOTATION/INCEPTION **Evaluating the risks to be covered & matching to appropriate policy/ premium**	**Personal data:** • Individual details • Identification details • Policy information	**Personal data:** • Perform contract • Legitimate interests (to determine the likely risk profile and appropriate insurer and insurance product)		**Personal data:** • Individual details • Identification • Policy information	**Personal data:** • Perform contract • Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium)		**Personal data:** • Individual details • Policy information	**Personal data:** • Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium)	
	Special categories of personal data: • Risk Details • Previous claims • Credit and anti-fraud data	**Special categories of personal data:** • In the substantial public interest (insurance purpose) • Consent		**Special categories of personal data:** • Risk Details • Previous claims • Credit and anti-fraud data	**Special categories of personal data:** • In the substantial public interest (insurance purpose) • Consent		**Special categories of personal data:** • Previous claims	**Special categories of personal data:** • In the substantial public interest (insurance purpose) • Consent	

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
QUOTATION/INCEPTION and **POLICY ADMINISTRATION** Collection or refunding of Premium	• Individual details • Financial information	• Perform contract • Legitimate interests (to recover debts due to us)	• Banks	• Individual details • Financial information	• Perform contract • Legitimate interests (to recover debts due to us)	• Banks			
POLICY ADMINISTRATION General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy.	**Personal data:** • Individual details • Policy information **Special categories of personal data :** • Risk Details • Previous claims • Current claims	**Personal data:** • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) **Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent		**Personal data:** • Individual details • Policy information **Special categories of personal data:** • Risk Details • Previous claims • Current claims	**Personal data:** • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) **Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent				
CLAIMS PROCESSING Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks	**Personal data:** • Individual details • Identification details • Financial information • Policy information **Special categories of personal data :** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Personal data:** • Perform contract • Legitimate interests (to assist our clients in assessing and making claims) **Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent • Legal Claims	**Personal data:** • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim	**Personal data:** • Individual details • Identification details • Financial information • Policy information **Special categories of personal data:** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Personal data:** • Perform contract • Legitimate interests (to assess the veracity and quantum of claims) **Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent • Legal claims	• Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim	**Personal data:** • Individual details • Policy information **Special categories of personal data:** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Personal data:** • Legitimate interests (to assess the veracity and quantum of claims) **Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent Legal claims	• Solicitors • Experts • [Loss adjustors?]

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
CLAIMS PROCESSING **Defending or prosecuting legal claims**	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Perform contract • Legitimate interests (to assist in assessing and making claims)	• Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Perform contract • Legitimate interests (to defend or make claims)	• Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim			
	Special categories of personal data : • Credit and anti-fraud data • Risk details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent • Legal Claims		**Special categories of personal data:** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent • Legal Claims				
CLAIMS PROCESSING **Investigating & prosecuting fraud**	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Perform contract • Legitimate interests (to assist with the prevention and detection of fraud)	• Solicitors • Private Investigators • Police • Experts • Third parties involved in the investigation or prosecution • Other insurers • Anti-fraud databases	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Perform contract • Legitimate interests (to assist with the prevention and detection of fraud)	• Solicitors • Private Investigators • Police • Experts • Third parties involved in the investigation or prosecution • Other insurers • Anti-fraud databases			
	Special categories of personal data : • Health data • Criminal records data • Other sensitive data • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent • Legal claims		**Special categories of personal data:** • Health data • Criminal records data • Other sensitive data • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent • Legal claims				
RENEWALS **Contacting you in order to renew the insurance policy**	**Personal data:** • Individual details • Policy information	**Personal data:** • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)		**Personal data:** • Individual details • Policy information	**Personal data:** • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)				

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
	Special categories of personal data : • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent		**Special categories of personal data:** • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent				
THROUGHOUT THE INSURANCE LIFECYCLE **Transferring books of business, company sales and reorganisations**	**Personal data:** • Individual details • Identification details • Financial information • Policy information • Marketing data	**Personal data:** • Legitimate interests (to structure our business appropriately) • Legal obligation	• Courts • Purchaser	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Legitimate interests (to structure our business appropriately) • Legal obligation	• Courts • Purchaser	**Personal data:** • Individual details • Policy information	**Personal data:** • Legitimate interests (to structure our business appropriately) • Legal obligation	• Courts • Purchaser
	Special categories of personal data: • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • Consent		**Special categories of personal data:** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data:** • Consent		**Personal data and special categories of personal data:** • Previous claims • Current claims	**Personal data and special categories of personal data:** • Consent	
THROUGHOUT THE INSURANCE LIFECYCLE **General risk modelling & underwriting**	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Legitimate interests (to build risk models that allow placing of risk with appropriate insurers)		**Personal data:** • Individual details • Identification details • Financial information Policy information	**Personal data:** • Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums)		**Personal data:** • Individual details • Policy information	**Personal data:** • Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums)	
	Special categories of personal data : • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) • Consent		**Special categories of personal data:** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest (insurance purpose) Consent		**Special categories of personal data:** • Previous claims • Current claims	**Special categories of personal data:** • In the substantial public interest (insurance purpose) Consent	
THROUGHOUT THE INSURANCE LIFECYCLE **Complying with our legal or regulatory obligations**	**Personal data:** • Individual details • Identification details • Financial information • Policy information • Marketing data	**Personal data:** • Legal obligation	• PRA, FCA, ICO and other regulators • Police • Other insurers (under court order) • Insurance Fraud database	**Personal data:** • Individual details • Identification details • Financial information • Policy information	**Personal data:** • Legal obligation	• PRA, FCA, ICO and other regulators • Police • Other insurers (under court order)	**Personal data:** • Individual details • Policy information	**Personal data:** • Legal obligation	• PRA, FCA, ICO and other regulators

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
	Special categories of personal data : • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest • Consent		**Special categories of personal data:** • Credit and anti-fraud data • Risk Details • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest • Consent		**Special categories of personal data:** • Previous claims • Current claims	**Special categories of personal data :** • In the substantial public interest • Consent	

* The intermediary column will also applicable to a Reinsurance intermediary.