

LAST UPDATED
28/05/2024

DATA PROTECTION
INSURANCE MARKET

CORE USES INFORMATION NOTICE



British
Insurance
Brokers'
Association

LIIBA



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OF LONDON

INSURANCE MARKET INFORMATION NOTICE

This notice refers only to data protection in the UK.
The data protection requirements of other jurisdictions may differ.

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**. 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**.

This notice may be updated from time to time: this version is dated **02 February 2024**.

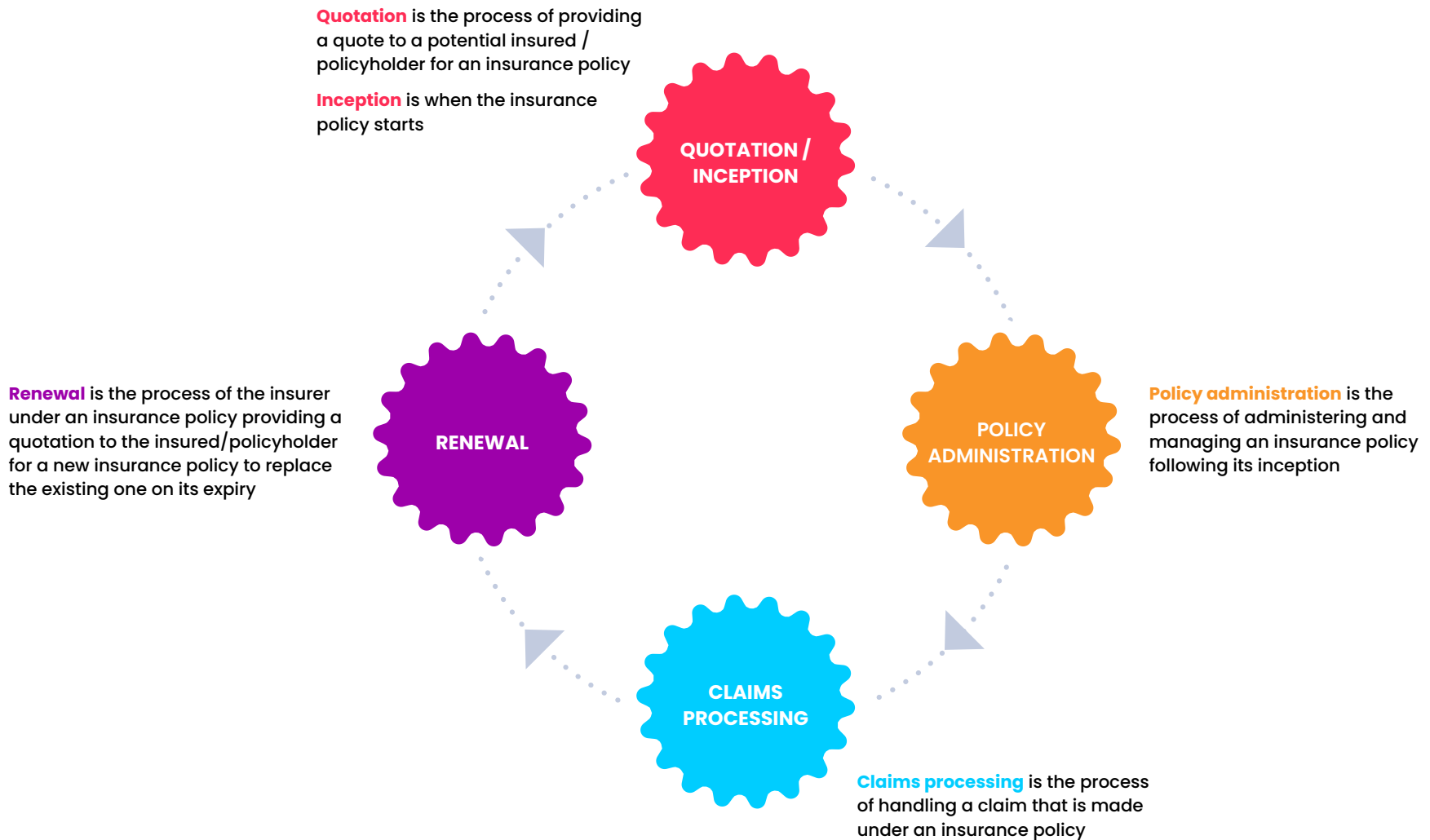
Insurance market participants may link to, or refer to, this notice from their own information notices or consent wordings and this notice should be read in conjunction with the participant's own information notice.

IN THIS NOTICE:

We, us or **our** refers to the relevant **insurance market participant**; **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**.

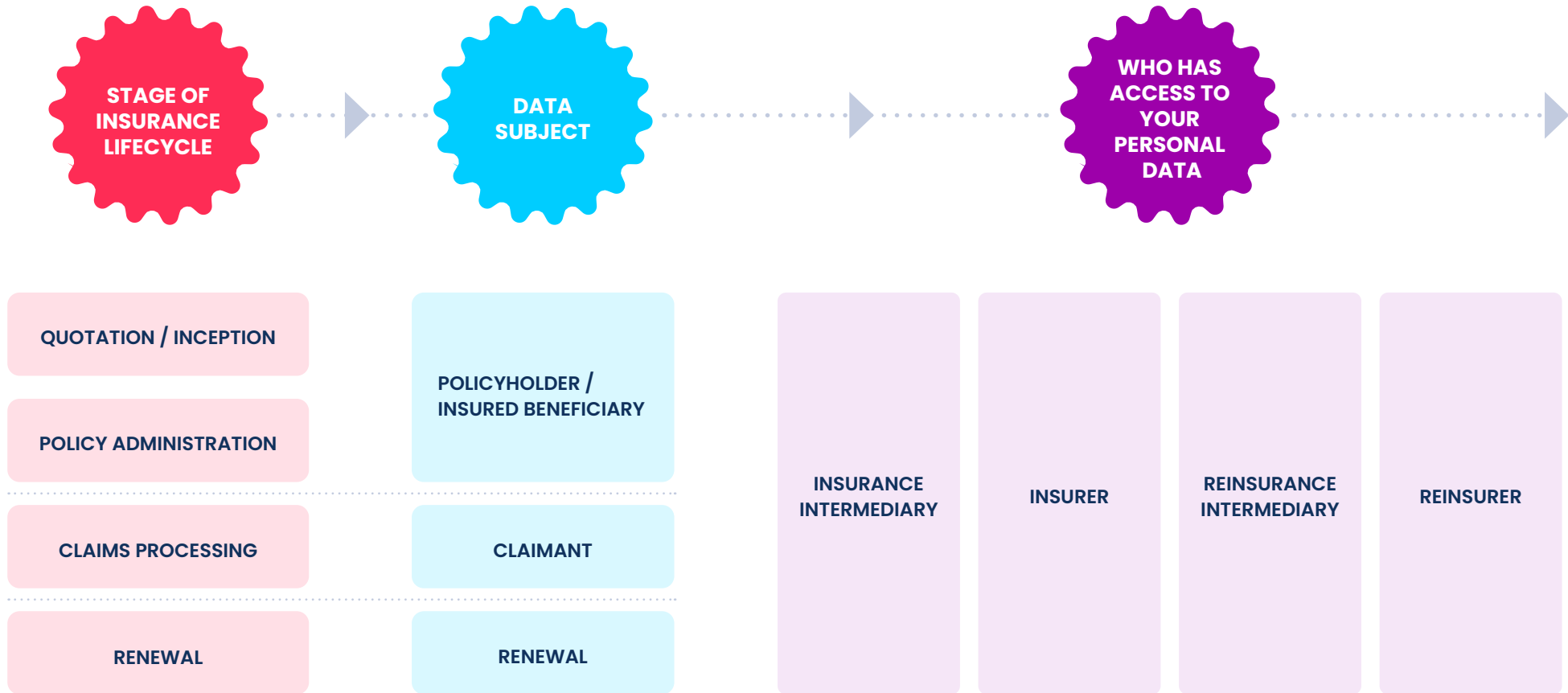
How the insurance market works

1. Insurance lifecycle



How the insurance market works

2 . Flows of personal data through the insurance lifecycle



The data we may collect about you

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:

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 national insurance number, passport number, tax identification number and driving license 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 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.

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 judgments 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 sources apply will depend on your particular circumstances

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.

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

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.

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 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

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Quotation / inception Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data 	
<p>Quotation / inception Evaluating the risks to be covered & matching to appropriate policy / premium</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Risk Details • Previous claims • Credit and anti-fraud data 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Risk Details • Previous claims • Credit and anti-fraud data 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Previous claims

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Quotation / Inception and policy Administration</p> <p>Collection or refunding of Premium</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Financial information 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Financial information 	
<p>Policy administration</p> <p>General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy.</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Risk Details • Previous claims • Current claims 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Claims processing Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims
<p>Claims processing Defending or prosecuting legal claims</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Claims processing Investigating & prosecuting fraud</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</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>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</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>Renewals Contacting you in order to renew the insurance policy</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Risk Details • Previous claims • Current claims 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Throughout the insurance lifecycle</p> <p>Transferring books of business, company sales and reorganisations</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Marketing data <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Previous claims • Current claims
<p>Throughout the insurance lifecycle</p> <p>General risk modelling & underwriting</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Previous claims • Current claims

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Throughout the insurance lifecycle</p> <p>Complying with our legal or regulatory obligations</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information • Marketing data <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk Details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Previous claims • Current claims

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Quotation / inception</p> <p>Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • 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 <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Performance of our contract with you • Compliance with a legal obligation • Legitimate interests (to ensure that the client is within our acceptable risk profile) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	
<p>Quotation / inception</p> <p>Evaluating the risks to be covered & matching to appropriate policy / premium</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests to determine the likely risk profile and appropriate insurance product and premium) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Quotation / Inception and policy Administration</p> <p>Collection or refunding of Premium</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to recover debts due to us) 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to recover debts due to us) 	
<p>Policy administration</p> <p>General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy.</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Claims processing</p> <p>Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to assist our clients in assessing) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent • Legal Claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to assess the veracity and quantum of claims) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent • Legal Claim 	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to assess the veracity and quantum of claims) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent • Legal claims
<p>Claims processing</p> <p>Defending or prosecuting legal claims</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Individual details • Identification details • Financial information • Policy information <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Credit and anti-fraud data • Risk details • Previous claims • Current claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to defend or make claims) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent • Legal Claims 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Claims processing Investigating & prosecuting fraud</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to assist with the prevention and detection of fraud) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent • Legal claims 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to assist with the prevention and detection of fraud) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent • Legal claims 	
<p>Renewals Contacting you in order to renew the insurance policy</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Perform contract • Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Throughout the insurance lifecycle Transferring books of business, company sales and reorganisations</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to structure our business appropriately) • Legal obligation <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to structure our business appropriately) • Legal obligation <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to structure our business appropriately) • Legal obligation <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Consent
<p>Throughout the insurance lifecycle General risk modelling & underwriting</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to build risk models that allow placing of risk with appropriate insurers) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent 	<p>Personal data:</p> <ul style="list-style-type: none"> • Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums) <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • In the substantial public interest (insurance purpose) • Consent

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Throughout the insurance lifecycle</p> <p>Complying with our legal or regulatory obligations</p>	<p>Personal data:</p> <ul style="list-style-type: none">• Legal obligation <p>Special categories of personal data:</p> <ul style="list-style-type: none">• In the substantial public interest• Consent	<p>Personal data:</p> <ul style="list-style-type: none">• Legal obligation <p>Special categories of personal data:</p> <ul style="list-style-type: none">• In the substantial public interest• Consent	<p>Personal data:</p> <ul style="list-style-type: none">• Legal obligation <p>Special categories of personal data:</p> <ul style="list-style-type: none">• In the substantial public interest• Consent

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Quotation / inception Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Credit reference agencies • Anti-fraud databases 	<p>Personal data:</p> <ul style="list-style-type: none"> • Group companies providing administration • Credit reference agencies • Anti-fraud databases 	
<p>Quotation / inception Evaluating the risks to be covered & matching to appropriate policy / premium</p>			

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Quotation / Inception and policy Administration</p> <p>Collection or refunding of Premium</p>	<p>Personal data:</p> <ul style="list-style-type: none">• Banks	<p>Personal data:</p> <ul style="list-style-type: none">• Banks	
<p>Policy administration</p> <p>General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy.</p>			

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Claims processing Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim 	<p>Personal data:</p> <ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim 	<p>Personal data:</p> <ul style="list-style-type: none"> • Solicitors • Experts • Loss adjustors
<p>Claims processing Defending or prosecuting legal claims</p>	<p>Personal data:</p> <ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim 	<p>Personal data:</p> <ul style="list-style-type: none"> • Claims handlers • Solicitors • Loss adjustors • Experts • Third parties involved in the claim 	

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Claims processing Investigating & prosecuting fraud</p>	<p>Personal data:</p> <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>Personal data:</p> <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>Renewals Contacting you in order to renew the insurance policy</p>			

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

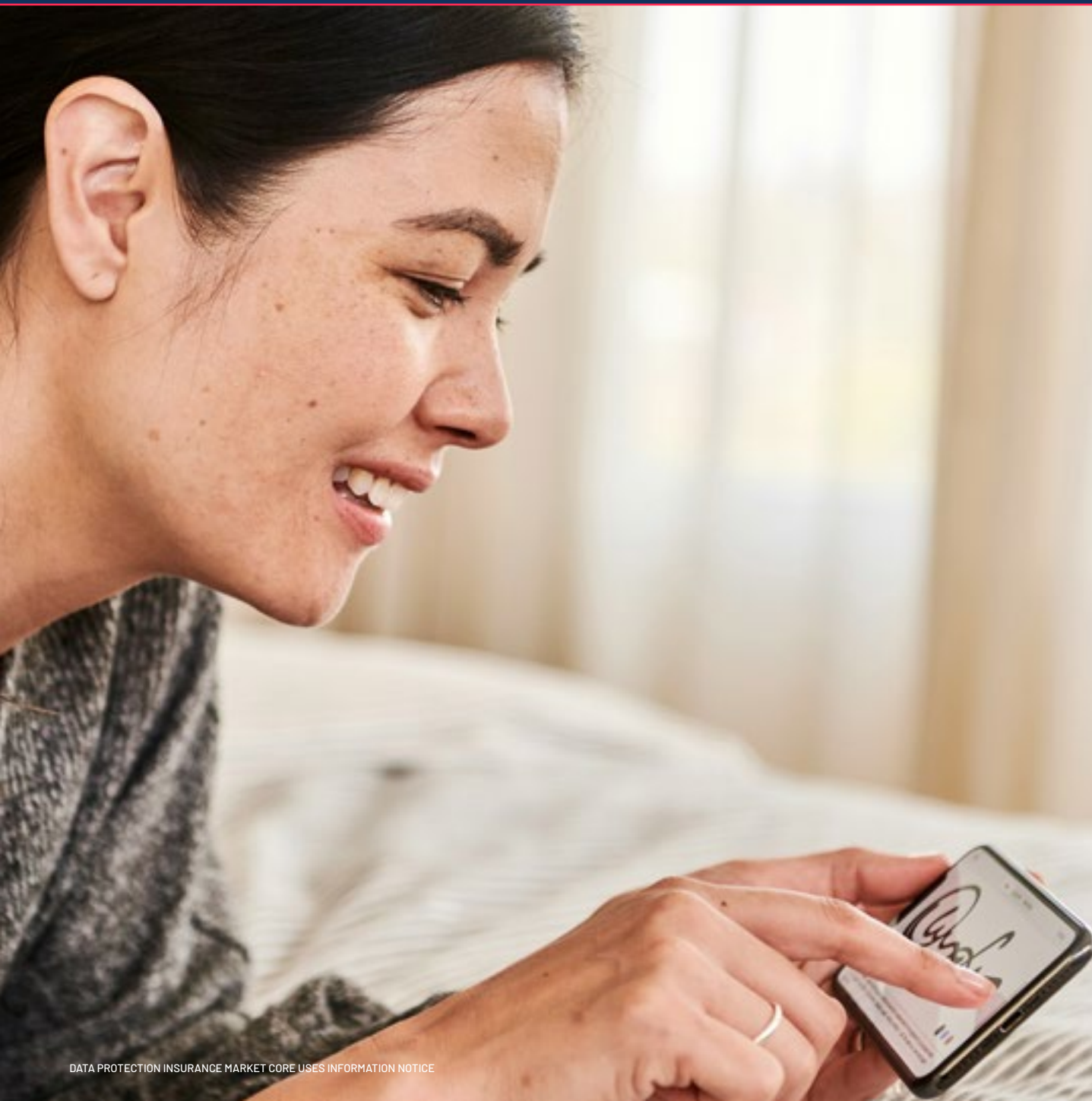
PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Throughout the insurance lifecycle Transferring books of business, company sales and reorganisations</p>	<p>Personal data:</p> <ul style="list-style-type: none">• Courts• Purchaser	<p>Personal data:</p> <ul style="list-style-type: none">• Courts• Purchaser	<p>Personal data:</p> <ul style="list-style-type: none">• Courts• Purchaser
<p>Throughout the insurance lifecycle General risk modelling & underwriting</p>			

* The intermediary column will also be applicable to a reinsurance intermediary.

Uses tables

PURPOSE	INTERMEDIARY*	INSURER	REINSURER
<p>Throughout the insurance lifecycle</p> <p>Complying with our legal or regulatory obligations</p>	<p>Personal data:</p> <ul style="list-style-type: none">• PRA, FCA, ICO and other regulators• Police• Other insurers (under court order)• Insurance Fraud database	<p>Personal data:</p> <ul style="list-style-type: none">• PRA, FCA, ICO and other regulators• Police• Other insurers (under court order)• Insurance Fraud database	<p>Personal data:</p> <ul style="list-style-type: none">• PRA, FCA, ICO and other regulators• Police• Other insurers (under court order)• Insurance Fraud database

* The intermediary column will also be applicable to a reinsurance intermediary.



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.

Profiling

As part of day to day processing, a number of profiling activities can take place, e.g. premium calculation, claims handling and ensuring products are aimed at the target market under the Consumer Duty. Profiling may also be used by insurance market participants to assess information you provide to understand fraud patterns and combat financial crime. 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).

AUTOMATIC DECISION MAKING

Insurance market participants should provide details of any automated decision making they undertake where such decision has a legal or other similarly significant effect. An “automated decision” is one taken without human intervention, including those decisions which are supported by Artificial Intelligence.

Each market participant will provide details of their own decision making including:

- the existence of automated decision making which has a legal or similarly significant effect;
- the logic involved;
- the significance and envisaged consequences; and
- any facility for you to ask for the decision to be reconsidered.



Retention of your personal data

We will keep **your** personal data only for so long as is necessary 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.



International transfers

We may need to transfer **your** data to third parties such as **insurance market participants** or service providers (or their affiliates) which are located outside of the UK. 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 UK, please contact the **data protection contact** of the relevant **participant**.

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, those rights may not apply (e.g. the prevention or detection of crime) and **our** interests such as 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**.



Information commissioner's office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 4AF

Tel. 0303 123 113 (Local rate)
01625 545 745 (National rate)

Email: casework@ico.org.uk



Information commissioner's office

45 Melville Street, Edinburgh EH3 4HL

Tel. 0131 244 9001

Email: scotland@ico.org.uk

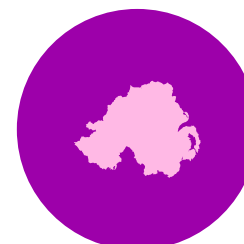


Information commissioner's office

2nd Floor, Churchill House, Churchill Way, Cardiff CF10 2HH

Tel. 029 2067 8400

Email: wales@ico.org.uk



Information commissioner's office

3rd Floor, 14 Cromac Place, Belfast BT7 2JB

Tel. 0303 123 114 (Local rate)
028 9027 8757 (National rate)

Email: ni@ico.org.uk

Glossary of key 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.

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INSURERS (sometimes also called underwriters), they 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 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.

Glossary of key terms

GDPR is the UK 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.