



DATA PROTECTION INSURANCE MARKET CORE USES INFORMATION NOTICE

1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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** [glossary](#). 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** [insurance lifecycle diagram](#).
- This notice may be updated from time to time: this version is dated 05 September 2018.
- **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** [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](#).





1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

This notice sets out the following:

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](#)
 - II. [GLOSSARY OF KEY TERMS](#)
- APPENDIX I.** [THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA](#)
- APPENDIX 2.** [CONTACT DETAILS OF THE INFORMATION COMMISSIONER’S OFFICE \(ICO\)](#)
- APPENDIX 3.** [LIST OF THE LEGAL GROUNDS WE RELY ON](#)



1. INTRODUCTION – How the insurance market works



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & RECIPIENTS OF OUR PROCESSING OF YOUR PERSONAL DATA

6. CONSENT

7. PROFILING

8. RETENTION OF YOUR PERSONAL DATA

9. INTERNATIONAL TRANSFERS

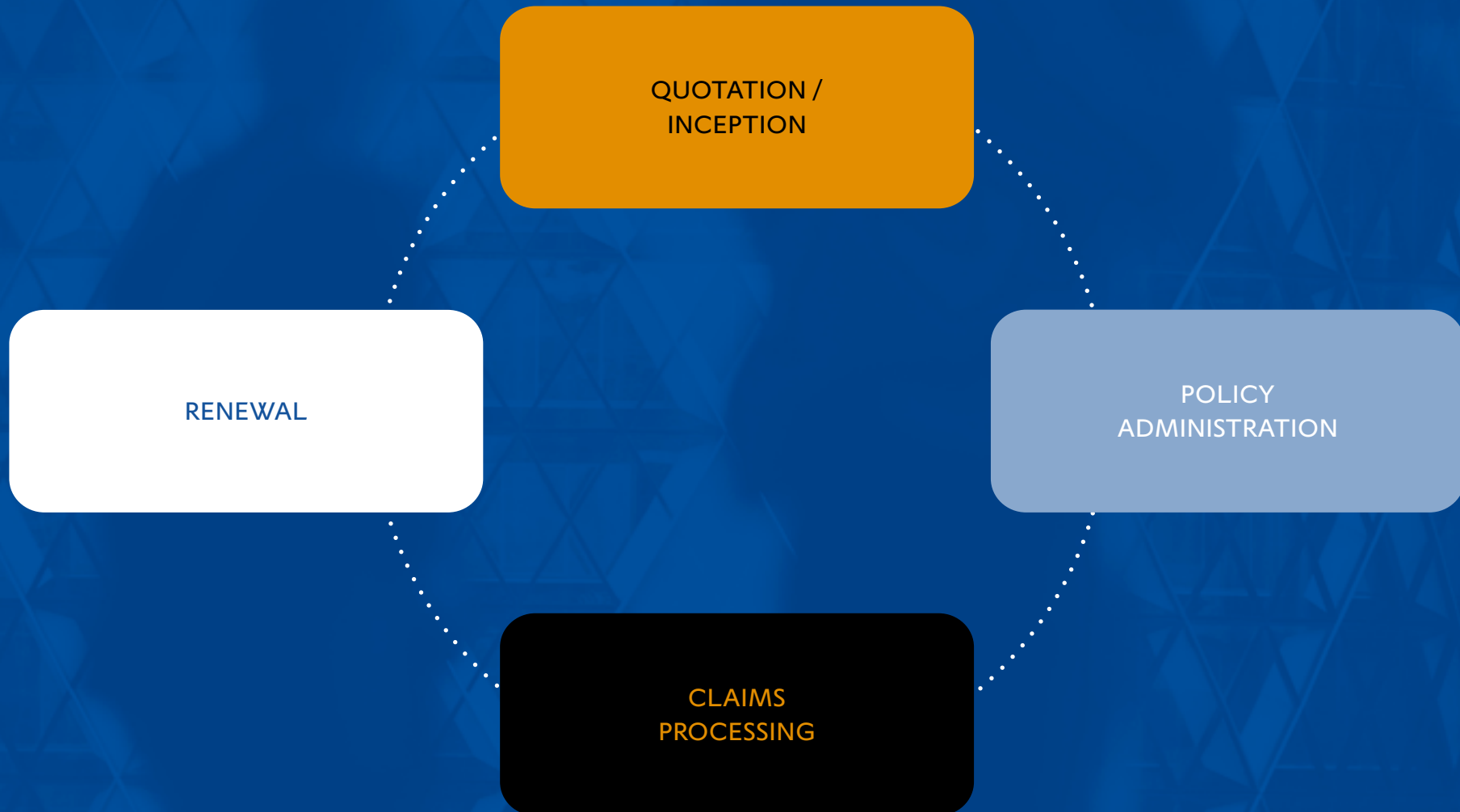
10. YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

11. GLOSSARY OF KEY TERMS

12. DATA USES TABLE

INSURANCE LIFECYCLE

FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE



1. INTRODUCTION – How the insurance market works



1. INTRODUCTION

INSURANCE LIFECYCLE

FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & RECIPIENTS OF OUR PROCESSING OF YOUR PERSONAL DATA

6. CONSENT

7. PROFILING

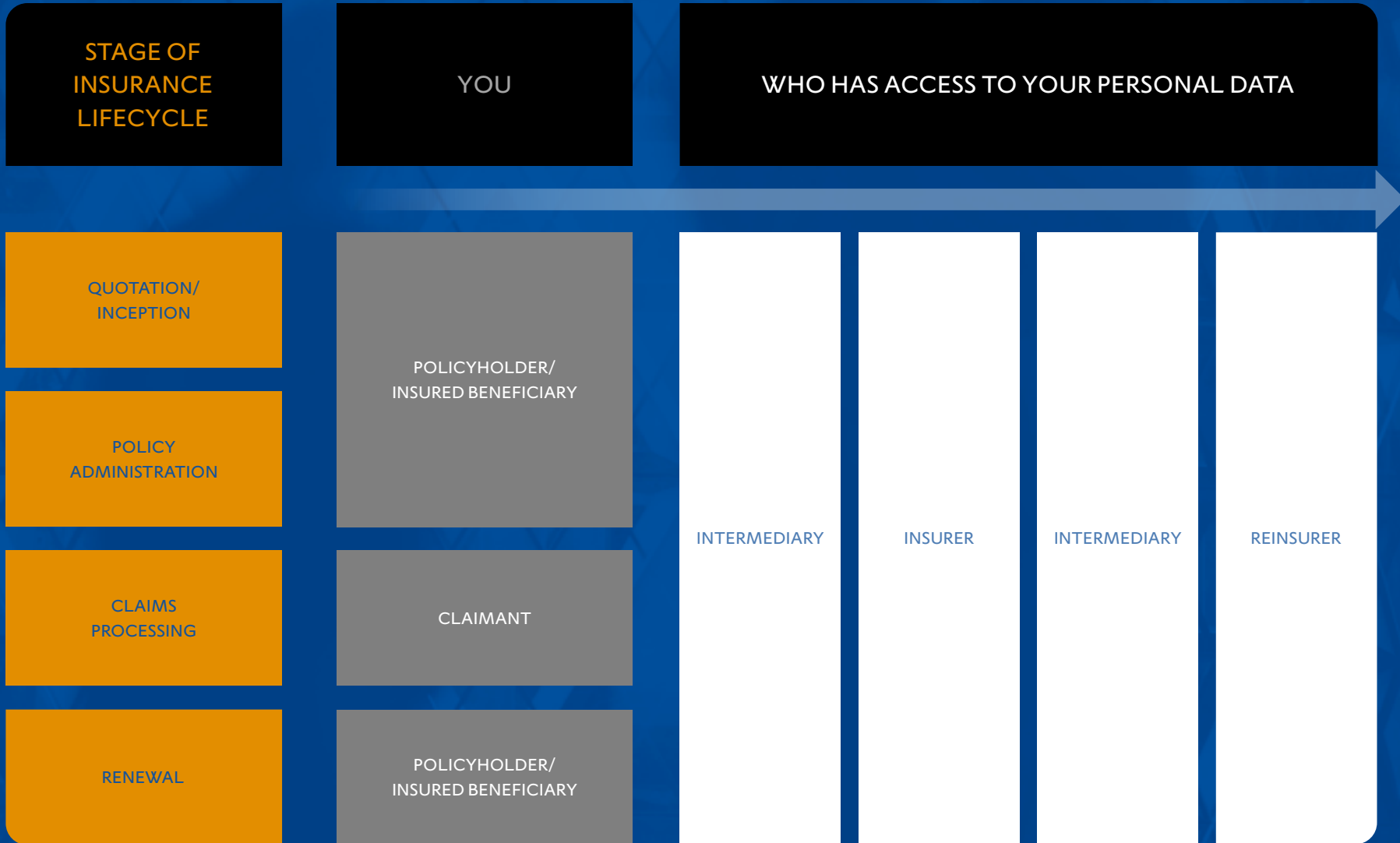
8. RETENTION OF YOUR PERSONAL DATA

9. INTERNATIONAL TRANSFERS

10. YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

11. GLOSSARY OF KEY TERMS

12. DATA USES TABLE



2. THE DATA WE MAY COLLECT ABOUT YOU



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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
- IDENTIFICATION DETAILS
- FINANCIAL INFORMATION
- RISK DETAILS
- POLICY INFORMATION
- CREDIT AND ANTI-FRAUD DATA
- PREVIOUS AND CURRENT CLAIMS
- SPECIAL CATEGORIES OF PERSONAL DATA



2. THE DATA WE MAY COLLECT ABOUT YOU



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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 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 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



3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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.



4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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.



4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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 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.



4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

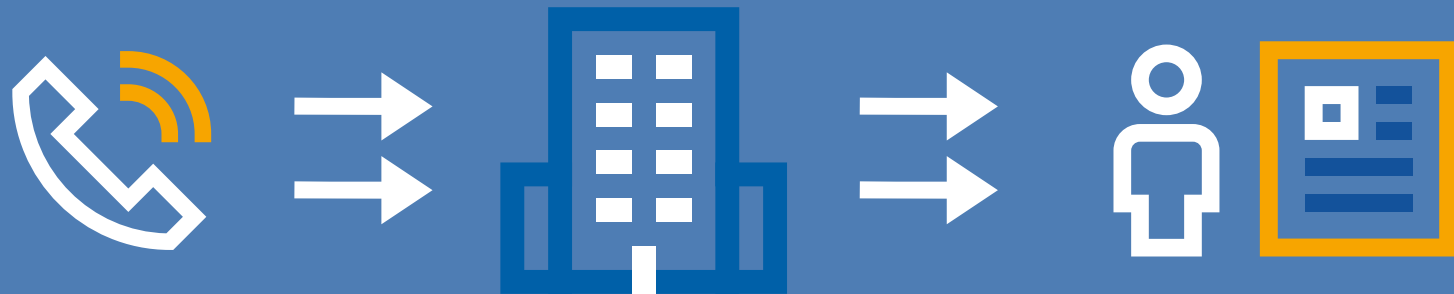
12. DATA USES TABLE

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 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.



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

1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & RECIPIENTS OF OUR PROCESSING OF YOUR PERSONAL DATA

6. CONSENT

7. PROFILING

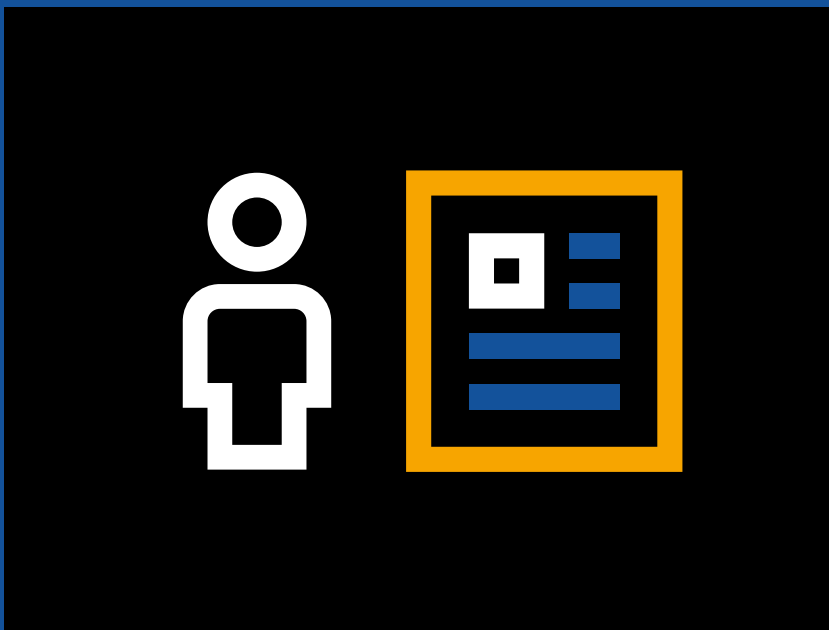
8. RETENTION OF YOUR PERSONAL DATA

9. INTERNATIONAL TRANSFERS

10. YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

11. GLOSSARY OF KEY TERMS

12. DATA USES TABLE



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 / INTERMEDIARY / INSURER / REINSURER](#)

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.





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

1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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

[PURPOSES / INTERMEDIARY / INSURER / REINSURER](#)

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.



[1. INTRODUCTION](#)[2. THE DATA WE MAY COLLECT ABOUT YOU](#)[3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)[4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS](#)[5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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](#)[12. DATA USES TABLE](#)

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.

7. PROFILING AND AUTOMATIC DECISION MAKING



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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.



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE



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.

[1. INTRODUCTION](#)[2. THE DATA WE MAY COLLECT ABOUT YOU](#)[3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)[4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS](#)[5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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](#)[12. DATA USES TABLE](#)

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**.



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE

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**.



10. YOUR RIGHTS AND CONTACT DETAILS OF THE ICO



1. INTRODUCTION

2. THE DATA WE MAY COLLECT ABOUT YOU

3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS

5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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

12. DATA USES TABLE



[1. INTRODUCTION](#)[2. THE DATA WE MAY COLLECT ABOUT YOU](#)[3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)[4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS](#)[5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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](#)[12. DATA USES TABLE](#)[KEY INSURANCE TERMS](#)[KEY DATA PROTECTION 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.

[1. INTRODUCTION](#)[2. THE DATA WE MAY COLLECT ABOUT YOU](#)[3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)[4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS](#)[5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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](#)[12. DATA USES TABLE](#)[KEY INSURANCE TERMS](#)[KEY DATA PROTECTION TERMS](#)

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. [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

[1. INTRODUCTION](#)[2. THE DATA WE MAY COLLECT ABOUT YOU](#)[3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)[4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTRACTS](#)[5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS & 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](#)[12. DATA USES TABLE](#)[KEY INSURANCE TERMS](#)[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

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

Special categories of personal data:

- Credit and anti-fraud data

Personal data:

- Individual details
- Identification details
- Financial information

Special categories of personal data:

- Credit and anti-fraud data

QUOTATION / INCEPTION

Evaluating the risks to be covered & matching to appropriate policy / premium

Personal data:

- Individual details
- Identification details
- Policy information

Special categories of personal data:

- Risk Details
- Previous claims
- Credit and anti-fraud data

Personal data:

- Individual details
- Identification
- Policy information

Special categories of personal data:

- Risk Details
- Previous claims
- Credit and anti-fraud data

Personal data:

- Individual details
- Policy information

Special categories of personal data:

- Previous claims

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

QUOTATION / INCEPTION

Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks

- 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

- Special categories of personal data:
- In the substantial public interest (insurance purpose)
 - Consent

- 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)

- 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:
- Perform contract
 - Legitimate interests (to determine the likely risk profile and

- Special categories of personal data:
- In the substantial public interest (insurance purpose)
 - Consent

- Personal data:
- Perform contract
 - Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium)

- Special categories of personal data:
- In the substantial public interest (insurance purpose)
 - Consent

- Personal data:
- Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium)

- Special categories of personal data:
- In the substantial public interest (insurance purpose)
 - Consent

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

QUOTATION /
INCEPTION

Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks

- Credit reference agencies
- Anti-fraud databases

- Group companies providing administration
- Credit reference agencies
- Anti-fraud databases profile) risk profile)

QUOTATION /
INCEPTION

Evaluating the risks to be covered & matching to appropriate policy / premium

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

QUOTATION /
INCEPTION
and POLICY
ADMINISTRATION

Collection or refunding
of Premium

- Individual details
- Financial information

- Individual details
- Financial information

POLICY
ADMINISTRATION

General client care, in-
cluding 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:
- Individual details
 - Policy information

- Special categories of personal data:
- Risk Details
 - Previous claims
 - Current claims

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

QUOTATION /
INCEPTION
and POLICY
ADMINISTRATION

Collection or refunding
of Premium

- Perform contract
- Legitimate interests
(to recover debts due to us)

- Perform contract
- Legitimate interests
(to recover debts due to us)

POLICY
ADMINISTRATION

General client care, in-
cluding communicating
with you regarding
administration and
requested changes to
the insurance policy.
Sending you updates
regarding your
insurance policy.

- 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:
- 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

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

QUOTATION /
INCEPTION
and POLICY
ADMINISTRATION

Collection or refunding
of Premium

• Banks

• Banks

POLICY
ADMINISTRATION

General client care, in-
cluding communicating
with you regarding
administration and
requested changes to
the insurance policy.
Sending you updates
regarding your
insurance policy.

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

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:

- 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:

- Individual details
- Policy information

Special categories of personal data:

- Credit and anti-fraud data
- Risk Details
- Previous claims
- Current claims

CLAIMS PROCESSING

Defending or prosecuting legal claims

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:

- Individual details
- Identification details
- Financial information
- Policy information

Special categories of personal data:

- Credit and anti-fraud data
- Risk Details
- Previous claims
- Current claims

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

CLAIMS PROCESSING

Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks

Personal data:

- Perform contract
- Legitimate interests (to assist our clients in assessing)

Special categories of personal data:

- In the substantial public interest (insurance purpose)
- Consent
- Legal 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

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

CLAIMS PROCESSING

Defending or prosecuting legal claims

Personal data:

- Perform contract
- Legitimate interests (to assist in assessing and making claims)

Special categories of personal data:

- In the substantial public interest (insurance purpose)
- Consent
- Legal Claims

Personal data:

- Perform contract
- Legitimate interests (to defend or make claims)

Special categories of personal data:

- In the substantial public interest (insurance purpose)
- Consent
- Legal Claims

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

CLAIMS PROCESSING

Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks

Personal data:

- Claims handlers
- Solicitors
- Loss adjustors
- Experts
- Third parties involved in the claim

Personal data:

- Claims handlers
- Solicitors
- Loss adjustors
- Experts
- Third parties involved in the claim

- Solicitors
- Experts
- [Loss adjustors?]

CLAIMS PROCESSING

Defending or prosecuting legal claims

- Claims handlers
- Solicitors
- Loss adjustors
- Experts
- Third parties involved in the claim

- Claims handlers
- Solicitors
- Loss adjustors
- Experts
- Third parties involved in the claim

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

CLAIMS PROCESSING

Investigating & prosecuting fraud

Personal data:

- Individual details
- Identification details
- Financial information
- Policy information

Special categories of personal data:

- Health data
- Criminal records data
- Other sensitive data
- Credit and anti-fraud data
- Risk Details
- Previous claims
- Current claims

Personal data:

- Individual details
- Identification details
- Financial information
- Policy information

Special categories of personal data:

- Health data
- Criminal records data
- Other sensitive data
- Credit and anti-fraud data
- Risk Details
- Previous claims
- Current claims

RENEWALS

Contacting you in order to renew the insurance policy

Personal data:

- Individual details
- Policy information

Special categories of personal data :

- Risk Details
- Previous claims
- Current claims

Personal data:

- Individual details
- Policy information

Special categories of personal data :

- Risk Details
- Previous claims
- Current claims

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

CLAIMS PROCESSING

Investigating & prosecuting fraud

Personal data:

- Perform contract
- Legitimate interests (to assist with the prevention and detection of fraud)

Special categories of personal data:

- In the substantial public interest (insurance purpose)
- Consent
- Legal claims

Personal data:

- Perform contract
- Legitimate interests (to assist with the prevention and detection of fraud)

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:

- 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:

- 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

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

CLAIMS PROCESSING

Investigating & prosecuting fraud

- Solicitors
- Private Investigators
- Police
- Experts
- Third parties involved in the investigation or prosecution
- Other insurers
- Anti-fraud databases

- Solicitors
- Private Investigators
- Police
- Experts
- Third parties involved in the investigation or prosecution
- Other insurers
- Anti-fraud databases

RENEWALS

Contacting you in order to renew the insurance policy

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





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 <hr/> <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 <hr/> <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 <hr/> <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 <hr/> <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 <p>Policy information</p> <hr/> <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 <hr/> <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Previous claims • Current claims

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





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"> • Legitimate interests (to structure our business appropriately) • Legal obligation <hr/> <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 <hr/> <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 <hr/> <p>Special categories of personal data:</p> <ul style="list-style-type: none"> • Consent
<p>THROUGHOUT THE INSURANCE LIFECYCLE</p> <p>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) <hr/> <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) <hr/> <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) <hr/> <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 applicable to a Reinsurance intermediary.





PURPOSE

INTERMEDIARY

INSURER

REINSURER

THROUGHOUT
THE INSURANCE
LIFECYCLE

Transferring
books of business,
company sales and
reorganisations

- Courts
- Purchaser

- Courts
- Purchaser

- Courts
- Purchaser

THROUGHOUT
THE INSURANCE
LIFECYCLE

General risk modelling
& underwriting

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

THROUGHOUT
THE INSURANCE
LIFECYCLE

Complying with our
legal or regulatory
obligations

Personal data:

- Individual details
- Identification details
- Financial information
- Policy information
- Marketing data

Special categories of personal data:

- Credit and anti-fraud data
- Risk Details
- Previous claims
- Current claims

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:

- Individual details
- Policy information

Special categories of personal data:

- Previous claims
- Current claims

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

THROUGHOUT
THE INSURANCE
LIFECYCLE

Complying with our
legal or regulatory
obligations

- Legal obligation

-
- In the substantial public interest
 - Consent

- Legal obligation

-
- In the substantial public interest
 - Consent

- Legal obligation

-
- In the substantial public interest
 - Consent

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





PURPOSE

INTERMEDIARY

INSURER

REINSURER

THROUGHOUT
THE INSURANCE
LIFECYCLE

Complying with our
legal or regulatory
obligations

- PRA, FCA, ICO and other regulators
- Police
- Other insurers (under court order)
- Insurance Fraud database

- PRA, FCA, ICO and other regulators
- Police
- Other insurers (under court order)
- Insurance Fraud database

- PRA, FCA, ICO and other regulators
- Police
- Other insurers (under court order)
- Insurance Fraud database

