

# ERS Privacy Policy

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The specialist motor insurer

[ers.com](https://www.ers.com)

## Controllers:

IQUW Syndicate Management Limited, 30 Fenchurch Street, London EC3M 3BD

IQUW Syndicate Services Limited, 30 Fenchurch Street, London EC3M 3BD

IQUW Administration Services Limited, 30 Fenchurch Street, London EC3M 3BD

Data protection officer: Simon Mahaffey, [dpo@ers.com](mailto:dpo@ers.com)

## About Us

One or more of IQUW Syndicate Management Limited, IQUW Syndicate Services Limited and IQUW Administration Services Limited (“ERS” or “we”) are data controllers in respect of your personal information. Our registered office is at 30 Fenchurch Street, London EC3M 3BD.

IQUW Syndicate Management Limited (registered in England and Wales No. 426475) is Managing Agent of ERS Syndicate 218 at Lloyd’s and is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, registered number 204851. IQUW Syndicate Services Limited (registered in England and Wales No. 02661753) is an Appointed Representative (registered number 402561) of IQUW Syndicate Management Limited and provides administrative services for IQUW Syndicate Management Limited. IQUW Administration Services Limited (registered in England and Wales No. 170558) is the main service company of the IQUW Group and is the employing entity for all companies in the IQUW Group. All three companies are subsidiaries of IQUW UK Limited (formerly ERS DGB Limited) which is the intermediate holding company for the IQUW Group’s UK companies (together the ‘IQUW UK Group’). The IQUW UK Group’s ultimate holding company is IQUW Holdings Bermuda Limited which is domiciled and incorporated in Bermuda. The main activity of the IQUW UK Group is underwriting general insurance and reinsurance business at Lloyd’s through its participation on Syndicates 218 and 1856.

Syndicate 218 offers a broad range of specialist motor insurance products under the ERS brand to personal lines and commercial market segments in the United Kingdom. For more information, click here: (<https://www.ers.com/about-us>)

This privacy policy expands on the Data Protection Notice included in our ERS policy documents. It describes the way in which we use your personal information and provides details of your rights. It contains essential information so please make sure you read it carefully. We may update this notice from time to time.

## Introduction to the Insurance Market

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers, and reinsurers. The London Insurance Market Core Uses Information Notice sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. We recommend you review that notice as well as this privacy policy.

Visit the LMA website page:

[http://www.lmalloyds.com/LMA/News/LMA\\_bulletins/LMA\\_Bulletin\\_2013/LMA17\\_038\\_MS.aspx](http://www.lmalloyds.com/LMA/News/LMA_bulletins/LMA_Bulletin_2013/LMA17_038_MS.aspx)

View the current version of the notice:

[http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17\\_038\\_MS\\_att1\\_information\\_notice.pdf](http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17_038_MS_att1_information_notice.pdf)

## Who does this Privacy Policy apply to?

This privacy policy describes how we manage personal information about the following people in relation to ERS insurance policies:

- People who request a quote, either directly or via a broker
- Insurance policyholders
- Named drivers and others covered by an ERS insurance policy.
- People who make a claim against one of our policyholders
- Witnesses and other third parties whose information we may receive.
- People who participate in ERS marketing promotions
- Users of the ers.com website

We process personal information in line with the UK's Data Protection laws and other relevant laws that apply.

## The personal information we may collect about you.

Types of Personal Data	Details
Individual details	<p>Name, address (including proof of address), other contact details such as email and phone numbers, gender*, marital status, date and place of birth, nationality, employment status, job title, image, details of family members including their relationship to you.</p> <p>*This is used for identification purposes, demographic analysis, modelling and forecasting only</p>
Identification details	<p>National insurance number, passport number, driving licence number, other relevant licences</p>
Financial information	<p>Bank account and/or payment details, income and other financial information</p>
Risk details	<p>Information to assess risk and provide insurance quotes, including data relating to your health, disabilities and criminal convictions (including motoring offences)</p>
Policy information	<p>Information about the quotes you receive and policies you take out</p>
Telematics (if you use this technology)	<p>Driving behaviour, location, frequency of vehicle use, time of use, mileage</p>
Credit and anti-fraud information	<p>Credit history, credit score, sanctions, and criminal offences, including information received from external databases about you</p>
Previous and current claims	<p>Information about previous and current claims (including under other insurance policies) which may include data relating to your health, disabilities, criminal convictions (including motoring offences) and in some cases surveillance reports; dashcam recordings where this technology is used; includes information about you from external databases and information collected from publicly available sources of information including social media.</p>
Special categories of personal data	<p>Information about health, disability, criminal</p>

	convictions (including motoring offences)
Technical data (if you use the ers.com website)	Your device and internet connection details such as IP address

## Where we collect your personal information

We may collect personal information about you from:

- You
- Your broker
- Your family members
- Your employer or their representative
- Other companies in the insurance market, including providers of black box (telematics) services.
- Credit reference agencies.
- Anti-fraud databases, claims registers, sanctions lists, court judgement and similar databases.
- Government agencies such as the DVLA (to check licence and vehicle information) and HMRC.
- The publicly available electoral register
- In the event of a claim, third parties including the other party to the claim, witnesses, experts, loss adjusters, legal advisers, and claims handlers.
- Other publicly available sources of information including social media.
- Cookies and similar technology – These are set on your device by us and our trusted partners. For further information please refer to our Cookies Policy.

## How we use and disclose your personal information

Below is a summary of the various stages of the insurance relationship. Further details about how we use and disclose your personal information are set out in the subsequent sections of this privacy policy.

### *Quotation/Inception:*

- Setting you up as a client, including 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

### *Telematics:*

- Determining driving behaviour and driving patterns
- Developing flexible telematics rating models

### *Claims Processing:*

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigating 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 and testing
- Transferring books of business, company sales & reorganisations
- The purchase by ERS of reinsurance coverage and reinsurance claims. This relates to large losses only.

*Disclosing and sharing your information:*

To assess the terms of your insurance contract, or to deal with any claims, we may need to share information like your name, address, date of birth and details such as medical conditions or criminal convictions. The recipients of this information could include (but are not limited to) credit reference agencies, anti-fraud databases, other insurers, underwriters, and other group companies who provide administration or support services. For claims handling, the recipients could include (but are not limited to) external claims handlers, loss adjusters, courts, legal and other expert advisers, and third parties who engaged in the claim. For reinsurance, recipients include reinsurance brokers, reinsurers, and legal advisers. More information about these disclosures is set out below.

The Data Protection laws classify information about your medical conditions, disabilities, and criminal convictions as 'special category' personal data which warrants extra protection. We will only share this kind of personal data where it is essential to administer your insurance contract or deal with any claims, or for anti-fraud purposes or for reinsurance matters.

## Accepting and Administering Your Policy

If you pay your premiums via a credit facility, we may share your information with credit reference agencies and other companies for use in credit decisions, to prevent fraud and to find people who owe money. We share information with other insurers, certain government organisations and other authorised organisations. We may verify driving licence and vehicle information with the DVLA and may check No Claims records against an external database.

If you ask us to transfer your policy to another broker, we will disclose details of your policy (including any other people covered by the policy), any claims made and any other related information to the new broker at your request.

## Insurance underwriting

We look at the possible risk in relation to your prospective policy (or anyone else involved in the policy) so that we can:

- Consider whether to accept a risk.
- Make decisions about providing and dealing with insurance and other related services for you and members of your household.
- Set price levels for your policy.
- Confirm your identity to prevent money laundering; and
- Check the claims history for you or any person or property likely to be involved in the policy or a claim at any time. We may do this:
  - When you apply for or change your insurance.
  - If there is an accident or a claim; or
  - At the time you renew the policy.

## Profiling

When calculating insurance premiums, we may compare your personal details against industry averages. Your personal information 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 to assess the information you provide so we can understand risk patterns.

Special categories of personal data may be used for profiling where this is relevant, such as medical history or past motoring convictions (including motoring offences).

We may also make some decisions (for example about whether to offer cover or what the premiums will be) without any intervention by our staff. These are known as automated decisions. We rely on the information you provide to your broker, and you can discuss the outcome of any automated

decisions with your broker. See [Your Rights](#) below for further information.

## Motor Insurers Bureau (MIB)

We work in partnership with the Motor Insurers' Bureau (MIB) and associated not-for-profit companies who provide several services on behalf of the insurance industry. At every stage of your insurance journey, the MIB will be processing your personal information and more details about this can be found via their website: [mib.org.uk](http://mib.org.uk). Set out below are brief details of the sorts of activity the MIB undertake:

- Checking your driving licence number against the DVLA driver database to obtain driving licence data (including driving conviction data) to help calculate your insurance quote and prevent fraud.
- Checking your 'No Claims Bonus' entitlement and claims history.
- Prevent, detect, and investigate fraud and other crime, including, by carrying out fraud checks.
- Maintaining databases of o Insured vehicles (Motor Insurance Policy Database or Motor Insurance Database/MID)
  - o *Vehicles which are stolen or not legally permitted on the road (Vehicle Salvage & Theft Data or MIAFTR)*
  - o *Motor, personal injury, and home claims (CUE)*
  - o *Employers' Liability Insurance Policies (Employers' Liability Database)*
- Managing insurance claims relating to untraced and uninsured drivers in the UK and abroad
- Working with law enforcement to prevent uninsured vehicles being used on the roads.
- Supporting insurance claims processes

You can find out more about how the MIB uses personal information here:

[www.mib.org.uk/privacy-and-cookie-policy/](http://www.mib.org.uk/privacy-and-cookie-policy/)

## Managing claims

If you make a claim, we may need to release information to another person or organisation involved in that claim. This includes, but is not restricted to, your broker, your legal representative, others involved in the incident, their insurer, their solicitor, or representative and medical teams, authorised repairers, the police, or other investigators. We may have to investigate your current claim and your claim and conviction history. This may involve external claims handlers, loss adjusters, legal and other expert advisers. We might also share your information with survey organisations to obtain feedback on the service we provide to you.

Under the conditions of your policy, you must tell us about any incident (such as an accident or theft) which may or may not result in a claim. When you tell us about an incident, we will pass information relating to it to centrally managed claims registers which are operated on behalf of the insurance industry.



## Call Recording

You should note that some telephone calls may be recorded or monitored, either by us, for example calls to or from our claims department, customer services team and underwriting department, or on our behalf by our third-party suppliers. Call recording and monitoring may be conducted for the following purposes:

- training and quality control.
- as evidence of conversations; and/or
- for the prevention or detection of crime (e.g., fraudulent claims).
- Enhance broker/commercial relationships (including meeting attendance).

## Preventing or detecting fraud and other criminal offences

We will check your information against a range of registers and databases for completeness and accuracy. We may also conduct searches of publicly available sources of information including social media to verify claims and detect and prosecute fraud. We may share your information with law enforcement agencies, legal advisers, investigators, other organisations, and public bodies.

If we find that false or inaccurate information has been given to us, or we suspect fraud, we will take appropriate action. If fraud is identified, details will be passed to fraud prevention agencies including the Claims Underwriting Exchange (CUE), the Vehicle Salvage & Theft Data or Motor Insurance Anti-Fraud & Theft Register (MIAFTR) run by the Motor Insurance Bureau (MIB) and the Insurance Fraud Register (IFR) run by the Insurance Fraud Bureau. Law enforcement agencies may access and use this information.

We and other organisations, including those from other countries, may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities.
- Managing credit and credit related accounts or facilities.
- Recovering debt.
- Checking details on proposals and claims for all types of insurance.
- Checking details of job applicants and employees.

Details of the registers, databases, and fraud prevention agencies we use may be requested from the Company Secretary at:

IQUW UK Limited, 30 Fenchurch Street, London EC3M 3BD

## Cheat line.

To protect our policyholders, we are members of the Insurance Fraud Bureau (IFB). If you suspect insurance fraud is being committed, you can call them on their confidential cheat line on 0800 422 0421.

## Consent and the Legal Basis for Processing Your Personal Information

Most of the personal information you provide to us is needed for us to assess your request for insurance, to enter the insurance contract with you and then to administer that contract. Some of the information is collected for fraud prevention purposes, as described above.

If we need your consent to use any specific information, we will make that clear at the time we collect the information from you. You are free to withhold your consent or withdraw it at any time, but if you do so it may impact upon our ability to provide insurance or pay claims.

Further details about the legal basis for our processing of personal information, and the disclosures we may make, can be found in the [Appendix](#) below.

## Suppliers

Like most organisations, ERS uses a variety of companies to provide services on our behalf. We enter contracts with those service providers to make sure they protect your personal information using appropriate security measures and we prohibit them from using your personal data other than as instructed by us.

Below is a list of service providers that have access to personal information to help service policies and subsequent claims:

Third Parties	Reason
Brokers	Brokers are the interface between ERS and policyholders. They provide information to ERS about policyholders, named drivers and other relevant individuals and we may share information with them about quotations, policies, and any claims. Some of our brokers are in Jersey, Guernsey and/or Isle of Man. A broker may also share your personal information if you take part in any of their marketing promotions, to administer the promotion and to deliver any prizes.
Third Parties	Any supplier, third party relationships linked to brokers performance. This could be in the monitoring of brokers, attendance to broker meetings and / or capture of ay auditing related to brokers e.g. Relata.
Insurance Software Houses	Software houses operate a trading platform which brokers can use to obtain quotations and insurance premiums for policies underwritten by insurers such as ERS.
Fraud Organisations	We share data with fraud organisations to meet our regulatory requirements and to

	protect ERS, our policyholders and claimants. This includes various providers used to support pricing decisions.
Fraud Investigators	Where additional information is required in relation to a reported or alleged incident, we may instruct claims investigators to conduct additional services such as interviews, reports and evidence review to validate the information presented. They need access to personal details to conduct a thorough investigation.
Out of Hours Suppliers	These are contracted parties to manage claims notification and indemnity enquiries outside of the ERS normal operating hours. They may have remote access to ERS Policy and Claims systems.
Claims Suppliers (Repairers, Engineers, Salvage Agents, Loss Adjusters, etc.)	These providers service claims as outlined in the insurance policy. The third party will need access to personal details to allow the claim to be reviewed and concluded.
Motor Insurance Bureau (MIB)	Motor Insurers have a regulatory requirement to submit some personal information about policyholders to the Motor Insurance Database (MID).
Administrative Support	ERS employs third party suppliers to manage inbound and outbound correspondence (i.e., scanning, referencing post, cheque processing, printing, and postal services) and other administrative tasks. One of our administrative support providers is in India.
Document Management	Document storage, tape storage, document destruction.
Professional Advisers	Legal advisers, accountants, auditors, project managers and other professional advisers.
IT and Related Providers	Software licenses/subscriptions, outsourced infrastructure support, ERS insurance systems, payment platform providers, telephony infrastructure and recordings.
Facilities	Cleaning and security services.
Reinsurance Brokers	Reinsurance Brokers are the interface between ERS and reinsurers. We may share

	information with them regarding ERS' policy summary data and large losses specifically when dealing with reinsurance claims.
Reinsurers	Reinsurers provide reinsurance cover to ERS to protect against material losses. This practice of spreading risk is standard practice in the insurance market. They are provided with information regarding ERS' policy summary data only and large losses specifically when dealing with reinsurance claims.

## International Transfers

Some of the partner organisations and service providers we work with may be in other countries. ERS uses service providers located in the USA and Israel. As a result, your information may be processed outside the UK and European Economic Area. In all cases we will make sure that your information is protected.

If you travel abroad, your information may need to be transferred to or from other countries to administer your insurance and deal with any claims, for example to provide recovery and repatriation services if your vehicle breaks down or you have an accident in another country.

Whenever we transfer your personal information out of the United Kingdom we will ensure a similar degree of protection is afforded to it by making sure that adequate safeguards are implemented, including transferring the data to a country that has been deemed to provide an adequate level of protection for personal data, or ensuring the transfer is subject to the standard contractual clauses approved by the European Commission or other contracts or mechanisms which provide equivalent protection.

## Other Uses and Disclosures

In addition to the disclosures described elsewhere in this privacy policy, we may also disclose your personal information in the following circumstances: (i) if required by law; (ii) in connection with a reorganisation, sale or transfer of all or any part of our business; (iii) if we believe that the disclosure is necessary to enforce or apply the terms of our contracts or otherwise to exercise or defend our rights; (iv) in order to comply with a judicial proceeding, court order or other legal obligation, or a regulatory or government inquiry.

We may also use your personal information if you take part in our marketing promotions, to administer the promotion and to deliver any prizes. This will cover any personal information obtained via your broker. In addition, we may use your personal information to send you marketing (see [Your Rights](#) below).

## Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a data breach where we are legally required to do so.

### **Retention**

We will keep your personal data only for as long as is necessary for the purpose for which it was collected. We will retain your information for as long as there is any possibility that either you or we may wish to bring a legal claim under or relating to your insurance, or where we are required to keep your information for legal or regulatory purposes. We have various retention periods for distinct types of claims and other records. If you would like more information about this, please contact us at the address shown below.

We may keep anonymised data for longer periods for analysis and modelling purposes.

## **Your Rights**

You have rights under the Data Protection laws including the right to access the information we hold about you and receive a copy of that information (subject to any legal restrictions that may apply), to have the information corrected if it is inaccurate, and to have it updated if it is incomplete.

You can also find out about any automated decisions we make that affect your insurance or premiums.

We may ask for proof of your identity before we can respond to your request.

We will ask your permission before conducting any marketing. You have the right to opt out of receiving marketing at any time. You can use the unsubscribe option that is included in all our marketing emails or contact us using the details given below.

Some of the cookies or similar technology on the ers.com website allow third parties including social media companies that you use to collect your information, so that they can deliver marketing content to you on our behalf through their platforms. Where you have consented to our use of these cookies but subsequently wish to opt out of receiving this type of marketing, you should refer to your social media company's privacy policy for information on how to opt out of receiving marketing. Please note that we are not responsible for the collection, usage and disclosure policies and practices of other organisations. Please refer to their privacy policies for further information.

Details about the collecting and handling of your personal data by LinkedIn as well as your rights and setting options for protecting your personal information can be found in the LinkedIn privacy policy which can be found at [www.linkedin.com](http://www.linkedin.com). If you do not want LinkedIn to track your behaviour as a LinkedIn member on third-party websites, you can opt out in your LinkedIn settings.

In extremely limited circumstances and only where you have given us your express consent, we may pass your data to a third party so that they can contact you for marketing purposes. In such circumstances we may function as data processor in collecting your consent and sending it to the third party, and the third party will be a data controller in respect of the relevant data. You should refer to the relevant third party's privacy policy for further information on how they use your data.

In certain circumstances you may also have the following rights:

- The right to have your data deleted.
- The right to restrict or object to the processing of your personal data.
- Where you have provided personal data voluntarily, or otherwise consented to its use, the right to withdraw your consent.
- The right to receive a copy of the personal information which you have provided to us, in a structured, commonly used, and machine-readable format or to request that we transfer that information to another party (known as "data portability").

If you wish to exercise any of your rights, please contact us at:

Data Protection Officer ERS  
30 Fenchurch Street  
London  
EC3M 3BD

[\*\*dpo@ers.com\*\*](mailto:dpo@ers.com)

If you are not satisfied with our use of your personal data or our response to any request by you to exercise your rights in relation to your personal data, please contact [\*\*compliance@ers.com\*\*](mailto:compliance@ers.com)

You also have a right to make a complaint to the Information Commissioner:

Information Commissioner's Office  
Wycliffe House  
Water Lane Wilmslow Cheshire  
SK9 5AF

**0303 123 1113**

[\*\*icocasework@ico.org.uk\*\*](mailto:icocasework@ico.org.uk)

## Appendix

### Legal Basis for Processing Personal Information

PURPOSE	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)	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 Consent	
QUOTATION/INCEPTION Evaluating the risks to be covered & matching to appropriate policy/premium	Personal data: Individual details Identification Policy information	Personal data: Perform contract. Legitimate interests (to determine the 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: Consent	
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

MARKETING	Personal data: Individual details Identification details marketing preferences (opt in/opt out) Technical data	Consent Legitimate interests (to administer promotions and deliver prizes)	Group companies providing administration. Third parties in respect of other insurance products e.g. Relata Social media companies marketing on our behalf
POLICY ADMINISTRATION	Personal data: Individual details	Personal data: Perform contract	



PURPOSE	Categories of data	Legal grounds	Disclosures
General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy.	Policy information	Legitimate interests (to correspond with clients, beneficiaries, and claimants to facilitate placing of and claims under insurance policies)	
	Special categories of personal data: Risk Details Previous claims Current claims	Special categories of personal data: 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	Personal data: Perform contract Legitimate interests (to assess the veracity and quantum of 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: Consent Legal claims	
CLAIMS PROCESSING Defending or prosecuting legal claims	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: 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

	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: Consent Legal claims Substantial Public Interest	Third parties involved in the investigation or prosecution. Other insurers Anti-fraud databases
RENEWALS	Personal data:	Personal data:	

PURPOSE	Categories of data	Legal grounds	Disclosures
Contacting you to renew the insurance policy	Individual details Policy information	Perform contract Legitimate interests (to correspond with clients, beneficiaries, and claimants to facilitate the placing of and claims under insurance policies)	
	Special categories of personal data: Risk Details Previous claims Current claims	Special categories of personal data: Consent	
THROUGHOUT THE INSURANCE LIFECYCLE Transferring books of business, company sales and reorganisations	Personal data: Individual details Identification details Financial information 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 Substantial Public Interest	
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 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: Consent Substantial public interest	

REINSURANCE managing reinsurance claims	Personal data: Individual details Identification details Policy information	Personal data: Legitimate interests (to ensure we have appropriate insurance in place from reinsurers and to make claims under the reinsurance policies)	Reinsurance brokers, reinsurers, and advisers.
	Special categories of personal data: Medical data	Special categories of personal data: Substantial public interest (use of the data is necessary for insurance purposes) Legal Claims	

PURPOSE	Categories of data	Legal grounds	Disclosures
THROUGHOUT THE	Personal data:	Personal data:	PRA, FCA, ICO and
INSURANCE LIFECYCLE	Individual details	Legal obligation	other regulators
Complying with our legal	Identification details		Police
or regulatory obligations	Financial information		Other insurers (under
	Policy information		court order)
	Special categories of	Special categories of	
	personal data:	personal data:	
	Credit and anti-fraud	Consent	
	data	Substantial Public	
	Risk Details	Interest	
	Previous claims		
	Current claims		