## Appendix 2 Legal Basis for Processing

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to	
Prospective I	Prospective Insureds and Insured Persons			
Set up a record on our systems	<ul> <li>Contact Details</li> <li>Personal Risk Information</li> <li>Policy Information</li> </ul>	Performance of a contract      Legitimate interests (to ensure we have an accurate record of all Insured Persons we cover)	Service Providers	
Carry out background, sanction, fraud and credit checks	<ul> <li>Contact Details</li> <li>Personal Risk Information</li> <li>Criminal Data</li> </ul>	Conditional consent      Legitimate interests (to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud)      Local law exemption	<ul> <li>Service Providers</li> <li>Credit reference agencies</li> <li>Anti-fraud databases</li> </ul>	
Consider the underwriting submission, assess risk and write policy	<ul> <li>Personal Risk Information</li> <li>Health Data</li> <li>Criminal Data</li> </ul>	Take steps to enter into a contract      Legitimate interests (to determine the likely risk profile and appropriate level, cost and type of cover to extend, if any)      If we have not asked for your consent, the 'insurance purposes' exemption      If we have specifically asked for it, your consent	Third Party Administrators     Other Insurers / Reinsurers	

Manage renewals	Contact Details	Performance of a contract	• Third Party Administrators
	<ul> <li>Policy Information</li> <li>Personal Risk Information</li> <li>Health Data</li> <li>Criminal Data</li> </ul>	<ul> <li>Legitimate         Interests (to             determine             whether to             extend cover for             a renewal period,             and if so, on             what terms)</li> <li>If we have not             asked for your             consent, the             'insurance             purposes'             exemption</li> <li>If we have             specifically asked             for it, your             consent</li> </ul>	Service Providers
Provide client care, assistance and support	<ul><li>Contact Details</li><li>Policy Information</li></ul>	<ul> <li>Performance of a contract</li> <li>Conditional consent</li> </ul>	<ul><li>Assistance Providers</li><li>Service Providers</li></ul>
Receive premiums and payments	<ul><li>Contact Details</li><li>Financial Information</li></ul>	Performance of a contract	• Banks
Marketing	<ul><li>Contact Details</li><li>Marketing</li></ul>	<ul> <li>Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest)</li> <li>Consent</li> </ul>	Service Providers
Comply with legal and regulatory obligations	<ul> <li>Contact Details</li> <li>Policy Information</li> <li>Personal Risk Information</li> <li>Financial Information</li> </ul>	Legal obligation	<ul> <li>Regulators (e.g. FCA, PRA, ICO)</li> <li>Law enforcement bodies</li> <li>Courts</li> <li>Other Insurers (under court order)</li> </ul>

Claimant			
Receive notification of claim	<ul> <li>Policy Information</li> <li>Claim Details</li> </ul>	Performance of a contract  Legitimate interests (third party claimants) (to maintain an accurate record of all claims received and the identity of claimants)	<ul> <li>Third Party Administrators</li> <li>Assistance providers</li> <li>Service providers</li> </ul>
Assess claim	<ul> <li>Claim Details</li> <li>Health Data</li> <li>Criminal Data</li> </ul>	<ul> <li>Performance of a contract</li> <li>Legitimate interests (to assess the circumstances of a claim)</li> <li>If we have not asked for your consent, the 'insurance purposes' exemption</li> <li>If we have specifically asked for it, your consent</li> <li>Establish, exercise or defend legal claims</li> </ul>	<ul> <li>Third Party Administrators</li> <li>Loss Adjusters</li> <li>Solicitors</li> <li>Claims Experts</li> </ul>
Monitor and detect fraud	Claim Details     Anti-fraud Data	Performance of a contract      Legitimate interests (to monitor, assess and ultimately prevent fraud)      If we have not asked for your consent, the 'insurance purposes' exemption      'Preventing fraud' exemption      If we have specifically asked for it, your consent	<ul> <li>Surveillance providers (exceptionally)</li> <li>Anti-fraud databases</li> <li>Law enforcement bodies</li> </ul>

		• Establish, exercise or defend legal claims	
Settle claim	• Financial Information	Performance of a contract  Legitimate interests (third party claimants) (to settle claims to successful third party claimants)	<ul><li>Banks</li><li>Solicitors</li></ul>
Comply with legal and regulatory obligations	<ul> <li>Policy Information</li> <li>Claim Details</li> <li>Anti-fraud Data</li> <li>Financial Information</li> </ul>	• Legal obligation	<ul> <li>Regulators (e.g. FCA, PRA, ICO)</li> <li>Law enforcement bodies</li> <li>Courts</li> <li>Other Insurers (under court order)</li> </ul>
<b>Business Par</b>	tners and Visitors		
Manage relationships	• Contact Details	Legitimate interests (to maintain an accurate client and partner relationship management platform)  Consent	Service Providers
Administer contracts	Contact Details	Performance of a contract	
Marketing	<ul> <li>Contact Details</li> <li>Marketing</li> </ul>	Legitimate interests (to communicate to Business Partners about events, services or products which may be of interest to their sector)      Consent	Service Providers

Run events and host office visitors; accommodate website visitors	Website or Office Visitor	<ul> <li>Legitimate interests (to organise and host events which may be of interest to Business Partners)</li> <li>Consent</li> </ul>	Service Providers
Applicable to	all		
Transfer books of business	All (where relevant to the book)	<ul> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation (under a Part VII transfer)</li> <li>Consent</li> <li>The 'insurance purposes' exemption</li> </ul>	<ul><li>Courts</li><li>Purchaser</li><li>Professional advisors</li></ul>
Sale or reorganisation of a Chubb company	• All	<ul> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation (under a Part VII transfer)</li> <li>Consent</li> <li>The 'insurance purposes' exemption</li> </ul>	<ul><li>Courts</li><li>Purchaser</li><li>Professional advisors</li></ul>