

Chubb Privacy

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 Insureds and Insured Persons			
Set up a record on our systems	<ul style="list-style-type: none">• Contact Details• Personal Risk Information• Policy Information	<ul style="list-style-type: none">• Performance of a contract• Legitimate interests <i>(to ensure we have an accurate record of all Insured Persons we cover)</i>	<ul style="list-style-type: none">• Service Providers
Carry out background, sanction, fraud and credit checks	<ul style="list-style-type: none">• Contact Details• Personal Risk Information• Criminal Data	<ul style="list-style-type: none">• Legitimate interests <i>(to ensure that Insured Persons are within our acceptable risk profile and to assist with the prevention of crime and fraud)</i>• Necessary in relation to AML / Counter-terrorist financing / prevention, detection or prosecution of crime	<ul style="list-style-type: none">• Service Providers• Credit reference agencies• Anti-fraud databases
Consider the underwriting submission, assess risk and write policy	<ul style="list-style-type: none">• Personal Risk Information• Criminal Data	<ul style="list-style-type: none">• Take steps to enter into a contract• Legitimate interests <i>(to determine the likely risk profile and appropriate level, cost and type of cover to extend, if any)</i>• Necessary in relation to AML / Counter-terrorist financing / prevention, detection or prosecution of crime	<ul style="list-style-type: none">• Third Party Administrators• Other Insurers / Reinsurers

Manage renewals	<ul style="list-style-type: none"> Contact Details Policy Information Risk Information Criminal Data (relating to directors or senior representatives of policy holders) 	<ul style="list-style-type: none"> Performance of a contract Legitimate Interests <i>(to determine whether to extend cover for a renewal period, and if so, on what terms)</i> Necessary in relation to AML / Counter-terrorist financing / prevention, detection or prosecution of crime 	<ul style="list-style-type: none"> Third Party Administrators Service Providers
Provide client care, assistance and support	<ul style="list-style-type: none"> Contact Details Policy Information 	<ul style="list-style-type: none"> Performance of a contract 	<ul style="list-style-type: none"> Assistance Providers Service Providers
Marketing	<ul style="list-style-type: none"> Contact Details Marketing 	<ul style="list-style-type: none"> Legitimate interests (to provide Insured Persons with information about insurance products or services which may be of interest) Consent 	<ul style="list-style-type: none"> Services Providers
Comply with legal and regulatory obligations	<ul style="list-style-type: none"> Contact Details Policy Information Personal Risk Information Financial Information 	<ul style="list-style-type: none"> Legal Obligation 	<ul style="list-style-type: none"> Regulators <i>(e.g. DFSA)</i> Law enforcement bodies Courts Other Insurers <i>(under court order)</i>

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Claimant			
Receive notification of claim Note that Chubb DIFC is not the primary recipient of claim notifications, although it may receive such notifications on an ad-hoc basis from third parties such as ceding companies and / or brokers	<ul style="list-style-type: none"> Policy Information Claim Details 	<ul style="list-style-type: none"> Performance of a contract Legitimate interests <i>(third party claimants) (to maintain an accurate record of all claims received and the identity of claimants)</i> 	<ul style="list-style-type: none"> Third Party Administrators Assistance providers Service providers
Assess claim Note that Chubb DIFC does not take an active role in assessing claims, but may support the Chubb entity which issued your policy in doing so on an ad hoc basis	<ul style="list-style-type: none"> Claim Details Health Data Criminal Data 	<ul style="list-style-type: none"> Performance of a contract Legitimate interests <i>(to assess the circumstances of a claim)</i> If we have specifically asked for it, your consent Establish, exercise or defend legal claims 	<ul style="list-style-type: none"> Third Party Administrators Loss Adjusters Solicitors Claims Experts

Commented [DLAP1]: Note to Chubb: As noted previously, we have reviewed the legal bases for processing of special category data and have unfortunately not identified an alternative basis for Chubb DIFC to process health information under such circumstances (to the limited extent to which it does process such data).

Monitor and detect fraud	<ul style="list-style-type: none"> • Claim Details • Anti-fraud Data 	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests (<i>to monitor, assess and ultimately prevent fraud</i>) • 'Preventing fraud' exemption • Establish, exercise or defend legal claims 	<ul style="list-style-type: none"> • Surveillance providers (<i>exceptionally</i>) • Anti-fraud database • Law enforcement bodies
Comply with legal and regulatory obligations	<ul style="list-style-type: none"> • Policy Information • Claim Details • Anti-fraud Data • Financial Information 	<ul style="list-style-type: none"> • Legal obligation 	<ul style="list-style-type: none"> • Regulators (<i>e.g. DFSA</i>) • Law enforcement bodies • Courts • Other Insurers (<i>under court order</i>)

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Business Partners and Visitors			
Manage relationships	<ul style="list-style-type: none"> • Contact Details 	<ul style="list-style-type: none"> • Legitimate interests (<i>to maintain an accurate client and partner relationship management platform</i>) • Consent 	<ul style="list-style-type: none"> • Service Providers
Administer contracts	<ul style="list-style-type: none"> • Contact Details 	<ul style="list-style-type: none"> • Performance of a contract 	
Marketing	<ul style="list-style-type: none"> • Contact Details • Marketing 	<ul style="list-style-type: none"> • Legitimate interests (<i>to communicate to Business Partners about events, services or products which may be of interest to their sector</i>) • Consent 	<ul style="list-style-type: none"> • Service Providers
Run events and host office visitors, accommodate website visitors	<ul style="list-style-type: none"> • Website or Office Visitor 	<ul style="list-style-type: none"> • Legitimate interests (<i>to organise and host events which may be of interest to Business Partners</i>) • Consent 	<ul style="list-style-type: none"> • Service Providers

Activity	Type of information collected	The basis on which we use the information	Who we may disclose the information to
Applicable to all			
Transfer books of business	<ul style="list-style-type: none"> • All (<i>where relevant to the book</i>) 	<ul style="list-style-type: none"> • Legitimate interests (to structure our business appropriately) • Legal obligation 	<ul style="list-style-type: none"> • Courts • Purchaser • Professional advisors

(insurance transfer scheme under applicable law)

Sale or organisation of a Chubb company

• All

• Legitimate interests (to structure our business appropriately)

• Purchaser
• Professional advisors

Recording of telephone calls

• Contact Details;
• Claim Details (although this is highly unlikely in the case of Chubb DIFC);
• Other information shared in the context of the call

• Legal obligation
• Legitimate interests *(to train staff, to provide evidence of intention to enter into an insurance contract, to help resolve complaints, to improve customer service or to detect fraud)*

• Service Providers
• Regulators
• Courts
• Law Enforcement Agencies

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