

## **Our processing of your personal information – Policyholder or beneficiary under an insurance policy we have placed**

If we have placed an insurance policy for you or if the insurance policy we have placed covers you or if you are a named individual under an insurance policy with us (for example a family member on a travel policy) this section will be applicable to you and will provide key information about how we use your personal information.

### **What personal information will we collect?**

- Your name and title, address, telephone numbers and email addresses, date of birth and gender.
- Where you are not the policyholder, your relationship or connection to the policyholder.
- Identity documents such as passport, driving licence and national insurance number.
- Employment status and related information such as job title, employment history and education.
- Information which is related to the insurance policy we have placed including:
  - details about previous insurance policies you have held and any previous claims you have made;
  - details about your family such as dependants or spouses; and
  - policy specific information. For example where we have placed home insurance for you, we will need information about your property, or if we will be placing equestrian insurance for you, we will need information about your house and the riding events you participate in.
- Financial information including:
  - your bank account and payment details;
  - details about your income; and
  - information obtained from checking sanctions lists and credit checks such as bankruptcy orders, individual voluntary arrangements, office disqualifications or county court judgments.
- Information which is relevant to any claims you make under an insurance policy we have placed for you and which we are assisting you with. This could include photographic evidence you provide us with, for example if you make a claim under your travel policy, we will need information about the country you visited.
- Information which is available publically such as internet search engines and social media where we need to investigate fraudulent claims.

### **What special categories of personal information will we collect?**

- Information about your physical and mental health if relevant to the insurance policy we have placed or any claims you make on an insurance policy we have placed (for example for a travel policy you may need to disclose pre-existing medical conditions).
- Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.

- We may also collect information because it is relevant to your policy or claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions; trade union membership; or data concerning your sex life or sexual orientation.

## **How will we collect your personal information?**

When you are the policyholder, directly from you:

- when we provide you with a quote;
- when we place an insurance policy for you;
- when you approach us because you want to renew a policy we have placed;
- when you make a claim on your policy; and
- during any communications we have, such as by telephone or email or when you make a complaint or general enquiry.

We will also collect your personal information from:

- The policyholder where you are a beneficiary.
- A third party who has power of attorney over you.
- Third parties who we rely on to administer the placing of your insurance policy and when we assist you with any claims you have such as insurers, third party claimants, defendants, witnesses and our own business partners.
- Third parties involved in a claim you have made under an insurance policy we have placed such as claims handlers, medical experts and medical screening service providers, investigators and loss adjusters.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Ecclesiastical Group.
- Public sources such as court judgments, insolvency registers, internet search engines, social media where we need to investigate fraudulent claims and directories of Anglican ministers.
- The Financial Conduct Authority and the Prudential Regulation who are our regulators.

## **What will we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We need to use your personal information to enter into or perform our contract with you.** We will rely on this legal ground for all activities all activities that we undertake in order to fulfil our contractual obligations and without using your personal information we would be unable to do, such as placing insurance cover for you, administering your application, assessing your application against market offerings, providing you with a quote and assisting with any claims you have.
- **We have a legal or regulatory obligation to use your personal information.** For example, we have legal obligations to carry out anti-money laundering checks and our regulators require us to maintain records of all dealings with you and to carry out sanctions checks and to comply with our regulatory reporting requirements we may need to send your personal information to our regulators.
- **We have a business need to use your personal information.** Such needs will include keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your “special categories of personal information” (such as information about your health, religion or criminal offences), we need to have an additional “legal ground”. When using your “special categories of personal information”, we will rely on the “legal grounds” set out below:

- **We have an insurance purpose to use your special categories of personal information and there is a substantial public interest** such as assessing your insurance application, arranging or administering a policy for you, assisting with any claims you have under an insurance policy we have placed.
- **It is in the substantial public interest to comply with regulatory requirements relating to unlawful acts and dishonesty** – such as carrying out fraud, credit and anti-money laundering checks.
- **It is in the substantial public interest to prevent or detect unlawful acts** and the processing of special categories of personal information is necessary for the purposes of prevention or detection of an unlawful act, for example where we suspect fraud.
- **We need to use your special categories of personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves.
- **You have given your consent.**

## What is the purpose for using your personal information

To assess your insurance application and obtain appropriate quotes for you

## Legal grounds for using your personal information

- It is necessary to enter into or perform our contract
- We have a business need (to assess all insurance

## Legal grounds for using your special categories of personal information

- It is necessary for the insurance purpose of administering an insurance policy.
- [We have your explicit consent. In some circumstances, we will need

To place an insurance policy with appropriate cover	<p>applications against market placement)</p> <ul style="list-style-type: none"> <li>• It is necessary to enter into or perform our contract</li> <li>• We have a business need (to place insurance cover which is in line with market placement)</li> </ul>	<p>to obtain your consent before we can place your policy.]</p> <ul style="list-style-type: none"> <li>• It is necessary for the insurance purpose of administering an insurance policy.</li> <li>• [We have your explicit consent. In some circumstances, we will need to obtain your consent before we can place your policy.]</li> </ul>
To assist you with any claims you make under an insurance policy we have placed	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform our contract.</li> <li>• We have a business need (to assist all customers with any claims they have).</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the insurance purpose of administering a claim under an insurance policy.</li> <li>• [We have your explicit consent. In some circumstances, we will need to obtain your consent before we can assist with any claims you have]</li> </ul>
To carry out fraud, credit and anti-money laundering checks on you	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform our contract.</li> <li>• We have a legal obligation.</li> <li>• We have a business need (to prevent fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud). It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud).</li> <li>• It is in the substantial public interest to comply with regulatory requirements relating to unlawful acts and dishonesty.</li> <li>• We have your explicit consent.</li> </ul>
To assist with any renewals or mid-terms adjustments of any insurance policy we have placed and any cancellations	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform our contract.</li> <li>• We have a business need (to assist customers and provide adequate broking services including with any renewals, mid-term-adjustments and cancellations)</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> <li>• It is necessary for the insurance purpose of administering an insurance policy.</li> <li>• [We have your explicit consent. In some circumstances, we will need to obtain your consent before we can arrange for any renewals, mid-term adjustments or cancellations].</li> </ul>
To handle any complaints you may have and generally communicate with you.	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform our contract.</li> <li>• We have a business need (to respond to all communications and</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> </ul>

	complaints and investigate and resolve complaints).	
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>We have a business need (to have our own insurance cover in place)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> <li>We need to establish, exercise or defend legal rights.</li> </ul>
For business purposes such as systems development migration of systems and live testing, diagnosing any problems with our servers and website	<ul style="list-style-type: none"> <li>We have a business need (to run an efficient business)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> </ul>
For business purposes such as maintaining management information and carrying out statistical and strategic analysis	<ul style="list-style-type: none"> <li>We have a business need (to run an efficient business and improve our business)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> </ul>
For financial purposes such as maintaining management information and accounting records and carrying out audits	<ul style="list-style-type: none"> <li>We have a business need (to maintain appropriate financial records)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> </ul>
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).	<ul style="list-style-type: none"> <li>We have a business need (to develop and improve the services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> </ul>
To contact you to inform you about services we think you might be interested in.	<ul style="list-style-type: none"> <li>We have a business need (to inform you about other services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>You have provided your consent.</li> </ul>

## Who will we share your personal information with?

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- The policyholder where you are a beneficiary.
- Third parties who we rely on to administer your insurance policy such as insurers, other insurance intermediaries and insurance distributors and our own business partners.
- Third parties we liaise with when assisting you with a claim such as claims handlers, medical experts and medical screening service providers, surveyors, investigators and loss adjusters.
- Medical screening service providers in relation to travel insurance.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.

- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Ecclesiastical Group.
- Service providers we have contracted with including our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers, marketing mailing providers and business suppliers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- The Financial Conduct Authority and the Prudential Regulation who are our regulators.
- Law enforcement agencies such as the police, HMRC and taxation authorities.
- Our own insurers and companies who we have appointed to assist with arranging our insurance.