

## **Our processing of your personal information – Prospective policyholder or beneficiary under an insurance policy we may be placing**

If you have contacted us to place insurance cover for you or if you will be a named beneficiary under an insurance policy we will be placing, 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 address(es), date of birth and gender.
- Where you are not the person applying for insurance, your relationship or connection to the prospective 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 your insurance application or the services we are providing for you 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 if we will be placing home insurance for you, we will need information about your property, or, if we are providing financial advice we will need information about your income, assets and health.
- 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 available publically such as internet search engines.

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

- Information about your physical and mental health provided on your insurance application if relevant to the insurance policy we will be placing (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 application, 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. For example, if we arrange Life Insurance for you we may need to collect information regarding your race or ethnicity on behalf of potential underwriters.

## How will we collect your personal information?

### ***Directly from you:***

- when you have approached us because you want to apply for an insurance policy;
- from your application form;
- when we provide you with a quotation for an insurance policy we will be placing; and
- during any communications we have, such as by telephone or email or when you make a general enquiry.

### ***We may also collect your personal information from:***

- The prospective policyholder where you are a beneficiary.
- Third parties who we rely on to administer the placing of your insurance policy such as insurers and our own business partners.
- Other brokers where they have approached us on your behalf.
- Third parties who provide sanctions checking services.
- 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, and internet search engines.

## 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 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 and providing you with a quote.
- ***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 and products 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.
- **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.
- **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.
- **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	Legal grounds for using your personal information	Legal grounds for using your special categories of personal information
To assess your insurance application and obtain appropriate quotes for 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 assess all insurance applications against market placement)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the insurance purpose of placing an insurance policy.</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).</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 comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> <li>• We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> <li>• We need to establish, exercise or defend legal rights.</li> <li>• We have your explicit consent.</li> </ul>

To generally communicate with you and handle any queries about your application.

- It is necessary to enter into or perform our contract.
- We have a business need (to respond to all communications).

- It is in the substantial public interest to comply with regulatory requirements relating to unlawful acts and dishonesty.
- We need to establish, exercise or defend legal rights.

For business purposes such as systems development, migration of systems and live testing, diagnosing any problems with our servers and website.

- We have a business need (to run an efficient business)

- It is necessary for the insurance purpose of placing and administering an insurance policy.

For business purposes such as maintaining management information, internal audits, and carrying out statistical and strategic analysis.

- We have a business need (to run an efficient business and improve our business)

- It is necessary for the insurance purpose of placing and administering an insurance policy.

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).

- We have a business need (to develop and improve the services we offer).

- It is necessary for the insurance purpose of placing and administering an insurance policy.

## 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 application such as insurers, other insurance intermediaries and insurance distributors and our own business partners.
- 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 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.