Lycetts

Our processing of your personal information – Third party claimant

If you have made a claim against an individual for whom we have placed insurance cover, 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.
- Identity documents such as passport, driving licence and national insurance number.
- Any information which is related to your claim which could include:
    - your job title and employment if relevant;
    - details about the incident; and
    - photographic evidence.
- 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 claim you are making.
- 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 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. 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.

We will also collect your personal information from:

- The policyholder who we have placed insurance cover.
- Third parties involved in the insurance and claim process such as insurers, third party claimants, defendants, witnesses and our own business partners.
- Third parties involved in the claim process such as claims handlers, medical experts and medical screening service providers, investigators and loss adjusters lawyers or the Crown Prosecution Service.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.

- Other companies in the Benefact Group.
- Public sources such as court judgments, insolvency registers, internet search engines, social media
- The Financial Conduct Authority 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 have a legal or regulatory obligation to use your personal information***. For example, our regulators require us to maintain records of all dealings with you 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 investigating claims, 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*** such as assisting with claims.
- ***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.
- ***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.
- ***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 assist in any claims made under an insurance policy we have placed	• We have a business need (to assess and investigate your claim and deal with it appropriately).	• It is necessary for the insurance purpose of handling claims. • [We have your explicit consent]

To comply with our legal or regulatory obligations.	• We have a legal obligation. • We have a legal obligation.	• It is necessary for the insurance purpose of handling claims. • It is in the substantial public interest to comply with regulatory requirements relating to unlawful acts and dishonesty. • We have your explicit consent. • We need to establish, exercise or defend legal rights.
To generally communicate with you.	• We have a business need (to respond to all communications related to an insurance policy we have placed).	• It is necessary for the insurance purpose of handling claims.
For business purposes such as maintaining management information 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 administering an insurance policy.
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 administering an insurance policy.
For financial purposes such as maintaining management information and accounting records and carrying out audits	• We have a business need (to maintain appropriate financial records)	• It is necessary for the insurance purpose of administering an insurance policy.
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers).	• We have a business need (to develop and improve the services we offer).	• It is necessary for the insurance purpose of 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.
- Other insurers involved in your claim.
- Third parties who we rely on when assisting with a claim such as insurers, third party claimants, defendants, witnesses and our own business partners.

- Third parties who have been appointed to assist with a claim and that we need to liaise with when assisting claims made under an insurance policy we have placed such as claims handlers, medical experts and medical screening service providers, surveyors, 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 Benefact 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.