

Policyholder or beneficiary under an insurance policy

If you make a claim, or are intending to make a prospective claim, either against a party who has an insurance policy with us or you wish to make a claim under an insurance policy under which you are a beneficiary, this section will be relevant to you and sets out our uses of your personal information.

What personal information will we collect?

- > Your name, address, date of birth and gender.
- > Contact information, including previous contact information, such as your telephone numbers and email addresses.
- > Financial information such as your bank details, payment details and information obtained as a result of our credit checks such as bankruptcy orders, individual voluntary arrangements or county court judgments.
- > Information about your relationship to the policyholder where you are the beneficiary and/or not the policyholder.
- > Information relating to your identity such as your national insurance number, passport number, vehicle registration number or driving licence number.
- > Information about your job such as your job title, employment history and employment records, (including information on your salary, benefits and earnings), education history and professional accreditations.
- > Information which we obtain as part of checking sanctions lists.
- > Information relevant to your insurance policy. This will depend on the nature of the policy but could include details relating to your property or business activities.
- > Information relevant to any claim or your involvement in the matter giving rise to a claim. For example, if you make a claim following a road traffic accident, we may use personal information relating to your vehicle and named drivers.
- > Information relating to previous insurance policies you have or your employer has held, your credit rating and claims you or your employer has made.
- > Information which we have gathered from publicly available sources such as internet search engines like Google, Companies House, Government department websites and social media sites, including Facebook, YouTube and LinkedIn. We will ensure that any such data is used for a justifiable purpose and is, where possible, accurate and up to date.
- > Information you or your employer gives us during telephone calls which are recorded.
- > Information obtained through our use of cookies. You can find out more information about this in our Cookies Policy.

Privacy policy

What special category/sensitive personal information will we collect?

- > Details about your physical and/or mental health which are relevant to your policy (e.g. if you take out or are covered by a personal accident and/or travel policy, we may need details of pre-existing medical conditions). This may take the form of medical reports.
- > Details about your criminal convictions and any related information. This will include information relating to any unspent convictions, pending prosecutions, fixed penalty notices or other relevant elements such as arrests or unspent cautions.
- > Whilst we do not actively collect other special category/sensitive personal information, there may be some circumstances where you disclose the special category/sensitive personal information when answering our questions, for example:
- > When we are providing a quote for the renewal of or revised terms for insurance cover, we will ask for details about your occupation which may indicate your trade union membership, political opinions, religious or philosophical beliefs – for example if you require motor insurance and you are a Church Minister.

How will we collect your personal information?

We will collect information directly from you when:

- > you apply for or renew a policy;
- > you make a claim on your policy or via the administration of a claim, or we are notified of an incident relevant to your policy;
- > you respond to a customer survey;
- > you use any of the QBE EO websites;
- > you contact us by email, telephone (including our telephone helpline) and through other written and verbal communications, including our online live chat facility e.g. via our e-trading platform, Claims Live Person facility;
- > you request information about our products and services or subscribe to a newsletter or bulletin; or
- > you contact us to make a complaint.

As well as obtaining information directly from you, we will collect information from:

- > The named policyholder where you are a beneficiary or named under an insurance policy;
- > Third parties involved in your insurance policy or claim (such as our business partners and representatives, Intermediaries, sub-brokers, other insurers, claimants, defendants, witnesses, or other individuals who provide us with information in relation to an incident);

- > Other third parties who provide a service in relation to your insurance policy or claim such as loss adjusters, claims handlers, lawyers, experts (including medical experts), healthcare and rehabilitation providers and other service providers;
- > third-party suppliers (for example Dun & Bradstreet and Bureau van Dijk, who provide commercial data and analytics about businesses, Duedil, who provide insight and context on private companies, and where applicable, telematics providers);
- > third-party administrators and suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers;
- > Emergency assistance and medical services providers;
- > Publicly available sources such as internet search engines like Google, Companies House, Government department websites and social media sites, including Facebook, YouTube and LinkedIn.
- > Other companies within the QBE Group;
- > Credit reference agencies, such as Graydon;
- > Insurance industry and other fraud prevention and detection databases and sanctions screening tools such as the Insurance Fraud Bureau, Insurance Fraud Register, Syndicated Intelligence for Risk Avoidance ('SIRA'), Absolute, The Cotswold Group, Validus and HMT Sanctions and contracted vendor data wash tools;
- > Insurance industry databases such as the Employers' Liability Tracing Office, the Motor Insurance Database, Motor Insurance Bureau, the Claims Underwriting Exchange (known as 'CUE') and the Motor Insurance Anti-Fraud and Theft Register;
- > Our regulators including the Financial Conduct Authority and the Prudential Regulation Authority;
- > The police, where they have provided us with information, and other law enforcement agencies;
- > Government agencies such as the DVLA, HMRC, DWP, National Crime Agency and the Bank of England;
- > Sanctions lists such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC), HM Treasury, Department of Foreign Relations & Trade and Federal Public Service Finance list; and
- > Professional regulators such as the General Medical Council, Solicitors Regulatory Authority, Association of British Insurers

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What will we use your personal information for?

As outlined in section 3, the 'legal grounds' we will rely on when we process your 'personal information' and/or 'special category/sensitive personal information' are as follows:

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special category/sensitive personal information, as applicable to the circumstances.
To administer and manage the insurance policy.	<ul style="list-style-type: none"> > Contract performance > Legal or regulatory obligation > Legitimate interests 	<ul style="list-style-type: none"> > Insurance purposes
Handling and paying claims.	<ul style="list-style-type: none"> > Contract performance > Legal or regulatory obligation > Legitimate interests 	<ul style="list-style-type: none"> > Insurance purposes > Legal rights
Prevention and detection of and investigating and prosecuting fraud and sanctions checking. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers and insurance industry databases.	<ul style="list-style-type: none"> > Contract performance > Legal or regulatory obligation > Legitimate interests 	<ul style="list-style-type: none"> > Insurance purposes > Preventing or detecting unlawful acts > Legal rights
Complying with our legal or regulatory obligations.	<ul style="list-style-type: none"> > Legal or regulatory obligation 	<ul style="list-style-type: none"> > Insurance purposes > Consent > Legal rights
Communicating with you and resolving any complaints that you might have.	<ul style="list-style-type: none"> > Contract performance > Legal or regulatory obligation > Legitimate interests 	<ul style="list-style-type: none"> > Insurance purposes > Consent > Legal rights
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).	<ul style="list-style-type: none"> > Legitimate interests 	<ul style="list-style-type: none"> > Consent
Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). For business processes and activities including analysis, review, planning and business transactions.	<ul style="list-style-type: none"> > Legal or regulatory obligation > Legitimate interests 	<ul style="list-style-type: none"> > Consent > Legal rights
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by the QBE Group.	<ul style="list-style-type: none"> > Legitimate interests 	<ul style="list-style-type: none"> > Consent
Tracing and recovering debt.	<ul style="list-style-type: none"> > Legitimate interests 	<ul style="list-style-type: none"> > Legal rights
Investigating or detecting the unauthorised use of our systems, to secure our systems and to ensure the effective operation of our systems).	<ul style="list-style-type: none"> > Legitimate interests 	<ul style="list-style-type: none"> > Consent > Preventing or detecting unlawful acts > Legal rights
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> > Legitimate interests 	<ul style="list-style-type: none"> > Insurance purposes > Legal rights
Transferring or selling all or part of our business or re-organising our company structure.	<ul style="list-style-type: none"> > Legal or regulatory obligation > Legitimate interests 	<ul style="list-style-type: none"> > If we are selling the entity which processes your data then the same lawful bases for processing the data will apply as above (the 'controller' will remain the same). > If we transfer only part of our business to a new owner which is not part of the QBE Group, including your insurance policy, we will only transfer your special category data for the following legal grounds: <ul style="list-style-type: none"> • Consent • Legal rights

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Who will we share your personal information with?

We will keep your personal information confidential and we will only share it where necessary for the purposes set out above with the following parties.

- > Other QBE Group companies for our general administration purposes, marketing purposes in accordance with the preferences you have expressed or for the prevention and detection of fraud.
- > Our insurance partners such as intermediaries, sub-brokers, Coverholders, (re)insurers or other companies who act as (re)insurance distributors.
- > Third parties who assist in the administration of insurance policies or the handling of claims. These include loss adjusters, claims handlers, surveyors, risk managers, valuers, accountants, auditors, banks, lawyers and other experts including medical experts.
- > Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance.
- > Third parties who provide sanctions checking services.
- > Insurance industry bodies (including the Employers' Liability Tracing Office and the Motor Insurance Database).
- > Fraud detection agencies (including the Insurance Fraud Bureau (www.insurancefraudbureau.org) and other third parties who operate and maintain fraud detection registers.
- > Private investigators/investigative firms and third parties, such as The Cotswold Group, who we ask to look into claims on our behalf in relation to suspected fraud.
- > Health providers (for example, a hospital which is responsible for any treatment you receive through the policy or a rehabilitation provider).
- > Our regulators including the Financial Conduct Authority and the Prudential Regulation Authority.
- > The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime.
- > Debt collection agencies.
- > Credit reference agencies, such as Graydon.
- > Our third-party service providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers, management consultancies, outsourced business process management providers, our subcontractors and tax advisers.
- > Third parties who undertake analysis for the purposes of product improvement.
- > Selected third parties in connection with any sale, transfer, or disposal of our business.
- > Government departments, such as Department for Work and Pensions ('DWP'), in connection with personal injury claims, including disclosing information on any hospitals that you have attended.
- > Policyholders, for the purposes of claims review meetings and discussing claims experiences.

We work in partnership with the Motor Insurers' Bureau (MIB) and associated not-for-profit companies who provide several services on behalf of the insurance industry. At every stage of your insurance journey, the MIB will be processing your personal information and more details about this can be found via their website: mib.org.uk. Set out below are brief details of the sorts of activity the MIB undertake:

- > Checking your driving licence number against the DVLA driver database to obtain driving licence data (including driving conviction data) to help calculate your insurance quote and prevent fraud
- > Checking your 'No Claims Bonus' entitlement and claims history
- > Prevent, detect and investigate fraud and other crime, including, by carrying out fraud checks
- > Maintaining databases of:
 - Insured vehicles (Motor Insurance Policy Database or Motor Insurance Database/MID)
 - Vehicles which are stolen or not legally permitted on the road (Vehicle Salvage & Theft Data or MIAFTR)
 - Motor, personal injury and home claims (CUE)
 - Employers' Liability Insurance Policies (Employers' Liability Database)
- > Managing insurance claims relating to untraced and uninsured drivers in the UK and abroad
- > Working with law enforcement to prevent uninsured vehicles being used on the roads
- > Supporting insurance claims processes

QBE European Operations

30 Fenchurch Street
London EC3M 3BD
+44 (0)20 7105 4000
QBEeurope.com



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