

Our processing of your personal information - Insurers, reinsurers and other business partners

If you are an insurer, reinsurer or another type of business partner such as a supplier, subcontractor that we do business with, 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.
- Employment status and related information such as job title, employment history and education.
- Bank and payment details.
- Financial 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 categories of personal information will we collect?

- 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.

How will we collect your information?

- Directly from you.
- Third parties who provide sanctions checking services.
- Other companies in the Ecclesiastical Group.
- Public sources such as court judgments, insolvency registers, internet search engines, social media.

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 a services contract with you.**
- **We have a legal or regulatory obligation to use your personal information.** For example, we have obligations to carry out due diligence checks on parties we engage with.
- **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:

- ***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 explicit 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 comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> • We have a legal obligation. 	<ul style="list-style-type: none"> • We need to establish, exercise or defend legal rights. • 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 comply with regulatory requirements relating to unlawful acts and dishonesty. • We have your explicit consent.
To carry out fraud, credit and anti-money laundering checks on you.	<ul style="list-style-type: none"> • It is necessary to enter into or perform your services contract. • We have a legal obligation. • We have a business need 	<ul style="list-style-type: none"> • 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 comply with regulatory requirements relating to unlawful acts and dishonesty.

	(to prevent fraud).	<ul style="list-style-type: none"> We have your explicit consent.
To engage with you and obtain your services and generally communicate with you.	<ul style="list-style-type: none"> It is necessary to enter into or perform your services contract. We have a business need (to respond to all communications and complaints and investigate and resolve complaints). 	<ul style="list-style-type: none"> We need to establish, exercise or defend legal rights. You have made this public knowledge.
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"> We have a business need (to run an efficient business) 	<ul style="list-style-type: none"> It is necessary for the insurance purpose of placing an insurance cover. We have your explicit consent.
For business purposes such as maintaining management information, internal audits and carrying out statistical and strategic analysis	<ul style="list-style-type: none"> We have a business need (to run an efficient business and improve our business) 	<ul style="list-style-type: none"> It is necessary for the insurance purpose of placing insurance cover. We have your explicit consent.
For financial purposes such as maintaining management information and accounting records and carrying out audits	<ul style="list-style-type: none"> We have a business need (to maintain appropriate financial records) 	<ul style="list-style-type: none"> It is necessary for the insurance purpose of administering an insurance policy. We have your explicit consent.

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 and any claimants.
- Third parties involved in the insurance and claim process such as insurers, third party claimants, defendants, witnesses and our own business partners.
- Third parties who have been appointed in relation a claim 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 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.

This notice was last updated on 16th April 2019.