

Purpose of Processing	Legal grounds	Disclosures
Quotation/Inception		
Establishing a client relationship, including fraud, anti-money laundering and sanctions checks	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Compliance with a legal obligation • Legitimate interests of smei (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Anti-fraud databases
Checking credit where we are taking any credit risk	<ul style="list-style-type: none"> • Legitimate interests of smei (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) 	<ul style="list-style-type: none"> • Credit reference agencies
Evaluating the risks to be covered and matching to appropriate insurer, policy and premium	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of smei (to determine the likely risk profile and appropriate insurer and insurance product) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers • Insurance intermediaries such as brokers and aggregators • Insurance broking platform providers
Policy Administration		
General client care, including communicating with clients	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of smei (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers
Collection or refunding of premiums, paying on claims, processing and facilitating other	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of smei (to recover debts due to us) 	<ul style="list-style-type: none"> • Insurers • Banks • Debt recovery providers

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payments		
Facilitating premium finance arrangements	<ul style="list-style-type: none"> • Performance of our contract with the individual (if her/she is the client) • Legitimate interests of smei (ensuring our clients are able to meet their financial obligations) 	<ul style="list-style-type: none"> • Premium Finance Providers • Banks
Claims processing		
Managing insurance claims	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of smei (to assist our clients in assessing and making claims) <p><i>For processing special categories of Personal Data (e.g. health information) and criminal records data:</i></p> <ul style="list-style-type: none"> • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Defending or prosecuting legal claims	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of smei (to assist our client in assessing and making claims) <p><i>For processing special categories of Personal Data (e.g. health information) and criminal records data:</i></p> <ul style="list-style-type: none"> • To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> • Insurers • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Investigating and prosecuting fraud	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of smei (to assist with the prevention and detection of fraud) <p><i>For processing special categories of Personal Data (e.g. health information) and criminal records data:</i></p> <ul style="list-style-type: none"> • To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> • Insurers • Lawyers • Police • Experts • Other insurers • Anti-fraud

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	<ul style="list-style-type: none"> Substantial public interest (Insurance purposes) 	databases <ul style="list-style-type: none"> Third parties involved in the investigation or prosecution, such as private investigators
Renewals		
Contacting you in order to arrange the renewal of the insurance policy	<ul style="list-style-type: none"> Performance of our contract with the individual (if he/she is the client) Legitimate interests of smei (to correspond with clients to facilitate the continuation of insurance cover) 	<ul style="list-style-type: none"> Insurers Insurance intermediaries such as brokers and aggregators.
Throughout the insurance lifecycle		
Marketing analytics and direct marketing, including data anonymisation	<ul style="list-style-type: none"> Legitimate interests of smei (to give clients relevant offers) Where we do not have an existing relationship with the individual, consent 	<ul style="list-style-type: none"> Insurers Group companies
Transferring books of business, company sales and reorganisations	<ul style="list-style-type: none"> Legitimate interests of smei (to structure our business appropriately) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> Substantial public interest (Insurance purposes) In certain circumstances, consent 	<ul style="list-style-type: none"> Group companies Courts Purchaser (potential and actual)
General risk modelling	<ul style="list-style-type: none"> Legitimate interests of smei (to build risk models that allow placing of risk with appropriate insurers) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> Substantial public interest (Insurance purposes) 	
Complying with our legal or regulatory obligations	<ul style="list-style-type: none"> Compliance with a legal obligation Legitimate interests of smei (to take pre-emptive steps to ensure legal and regulatory compliance) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> Insurance, data protection and other regulators Police Insurers Auditors
Website activities		

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To communicate with you regarding any queries you raise via the website	<ul style="list-style-type: none"> • Legitimate interests of smei (to correspond with website users) 	
To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud	<ul style="list-style-type: none"> • Compliance with a legal obligation • Legitimate interests of smei (to ensure the quality and legality of our online services) <p>For processing special categories of Personal Data and criminal records data:</p> <ul style="list-style-type: none"> • Substantial public interest (preventing fraud) 	<ul style="list-style-type: none"> • Third parties undertaking online monitoring • Anti-fraud databases
To ensure the website content is relevant and presented in the most effective manner for you and your device	<ul style="list-style-type: none"> • Legitimate interests of smei (to provide clients, beneficiaries and claimants with content and services on the website) 	
Testing our insurance software		
To create test environments within our insurance software system, so that we may assess how to implement updates/changes as necessary	<ul style="list-style-type: none"> • Legitimate interests of smei (to be able to implement insurance software updates/changes in order to provide services as an insurance broker and risk consultant) 	<ul style="list-style-type: none"> • Software providers