

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

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

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

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Complying with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation</li> <li>• Legitimate interests of NICEIC and ELECSA Insurance Services (to take pre-emptive steps to ensure legal and regulatory compliance)</li> </ul> <p><b>For processing special categories of Personal Data (e.g. health information) and criminal records data:</b></p> <ul style="list-style-type: none"> <li>• To establish, defend or prosecute legal claims</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance, data protection and other regulators</li> <li>• Police</li> <li>• Insurers</li> <li>• Auditors</li> </ul>
<b>Website activities</b>		
To communicate with you regarding any queries you raise via the website	<ul style="list-style-type: none"> <li>• Legitimate interests of NICEIC and ELECSA Insurance Services (to correspond with website users)</li> </ul>	
To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation</li> <li>• Legitimate interests of NICEIC and ELECSA Insurance Services (to ensure the quality and legality of our online services)</li> </ul> <p><b>For processing special categories of Personal Data and criminal records data:</b></p> <ul style="list-style-type: none"> <li>• Substantial public interest (preventing fraud)</li> </ul>	<ul style="list-style-type: none"> <li>• Third parties undertaking online monitoring</li> <li>• Anti-fraud databases</li> </ul>
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"> <li>• Legitimate interests of NICEIC and ELECSA Insurance Services (to provide clients, beneficiaries and claimants with content and services on the website)</li> </ul>	
<b>Testing our insurance software</b>		
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"> <li>• Legitimate interests of NICEIC and ELECSA Insurance Services (to be able to implement insurance software updates/changes in order to provide services as an insurance broker and risk consultant)</li> </ul>	<ul style="list-style-type: none"> <li>• Software providers</li> </ul>