

Our processing of your personal information – Witness to an incident

If you have witnessed an incident which has now become the subject of a claim under an insurance policy we have placed, 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.
- Any information which is related to the incident you witnessed.

What special categories of personal information will we collect?

- Information about your physical and mental health if you suffered an injury as a result of the incident you witnessed or where you disclose information for example referring to a disability you have.
- 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 personal information?

Directly from you when we contact you to discuss the incident you witnessed.

We will also collect your personal information from:

- Those people involved in the incident such as the policyholder, the claimant and other witnesses.
- Other third parties involved in the incident from an insurance administration perspective such as insurers, claims handlers, loss adjusters and business partners.
- Third parties that have been appointed to assist in relation to the incident you witnessed and that we need to liaise with when assisting claims made under an insurance policy we have placed such as medical experts, medical screening service providers and investigators.
- 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 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 and there is a substantial public interest such as assisting with claims.
- **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.
- **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 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 with any claims made under an insurance policy we have placed	<ul style="list-style-type: none"> • We have a business need (to assist with any claims made under an insurance policy we have placed). • We have a legal obligation. 	<ul style="list-style-type: none"> • It is necessary for the insurance purpose of assisting with claims. • We have your explicit consent.
To prevent any fraudulent claims	<ul style="list-style-type: none"> • We have a business need (to prevent fraud). 	<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

		<p>requirements relating to unlawful acts and dishonesty.</p> <ul style="list-style-type: none"> • We have your explicit consent. • We need to use your information in order to establish, exercise or defend legal rights.
<p>To comply with our legal or regulatory obligations.</p>	<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.
<p>For business purposes such as maintaining management information and carrying out statistical and strategic analysis</p>	<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 assisting with claims.
<p>For financial purposes such as maintaining management information and accounting records and carrying out audits</p>	<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 assisting with claims.
<p>For business purposes such as systems development, migration of systems and live testing, diagnosing any problems with our servers and website</p>	<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 assisting with claims.

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.
- Insurers that are involved in the claim.
- Other third parties involved in the incident from an insurance administration perspective such as brokers, insurers, claims handlers, loss adjusters and business partners.
- Third parties that have been appointed to assist in relation to the incident you witnessed and whom we need to liaise with when assisting with a claim such as medical experts, medical screening service providers and investigators.
- 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, 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 25th May 2018.