

Claimants and prospective claimants and third parties

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 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 relating to previous insurance policies you have held or under which you are a beneficiary, your credit rating and claims you or have made or which have been made for your benefit.
- > Information relevant to your 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 which we obtain as part of checking sanctions lists.
- > Information we have obtained from 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;
- > 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 according to our legitimate interests below and is, where possible, accurate and up to date.
- > Surveillance footage which may also include CCTV footage, video recordings, photos and reports that have been obtained by our private investigators/investigative firms, The Cotswold Group and other third parties which we engage to assist us with looking into claims on our behalf in relation to suspected fraud.
- > Information you or your employer gives us during telephone calls which are recorded.

Privacy policy

What special category/sensitive personal information will we collect?

- > 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.
- > Details about your physical and/or mental health which are relevant to your claim (for example, where you have been injured whilst at a property insured by us). This may take the form of medical reports.
- > We may also collect other special category/sensitive personal information, in limited circumstances, where relevant to your claim, for example:
- > Details of your race or ethnicity, including your nationality;
- > Your political opinions, religious or philosophical beliefs or trade union membership;
- > Genetic data;
- > Biometric data, such as voice recordings to analyse potentially fraudulent claims; and
- > Data concerning your sex life or sexual orientation, such as in a claim for occupational health services.

How will we collect your personal information?

We will collect information directly from you when:

- > you make a claim under a policy insured with us;
- > 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;

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

- > The party who holds a policy with us.
- > Third parties involved in the 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 claim such as loss adjusters, claims handlers, lawyers, professional 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.
- > 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, 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 and 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 Regulation Authority and Association of British Insurers.

Privacy policy

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.
Handling and paying claims.	<ul style="list-style-type: none"> > 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"> > 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"> > 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
Tracing and recovering debt.	<ul style="list-style-type: none"> > Legitimate interests 	<ul style="list-style-type: none"> > 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
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 > 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

Privacy policy

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 handling of claims. These include loss adjusters, claims handlers, surveyors, risk manager, valuers, accountants, auditors, banks, lawyers and other experts including medical experts.
- > Other insurers (e.g. where another insurer is also involved in a claim that you are making).
- > 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, 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 as a result of your claim 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.
- > 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.
- > Selected third parties in connection with any sale, transfer or disposal of our business.
- > Government departments, such as 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

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