

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 Jelf (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and 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"> • 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 Jelf (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 Jelf (to determine the likely risk profile and appropriate insurer and insurance product) <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 • Insurance intermediaries such as brokers and aggregators • Insurance broking platform providers

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Evaluating the risks to be covered and matching to appropriate employee benefits provider, products and price	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of Jelf (to determine the likely risk profile and appropriate provider and 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"> • Employee health and benefits 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 Jelf (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 payments	<ul style="list-style-type: none"> • Performance of our contract with the individual (if he/she is the client) • Legitimate interests of Jelf (to recover debts due to us) 	<ul style="list-style-type: none"> • Insurers • Banks • Debt recovery providers
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 Jelf (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 Jelf (to assist our clients in assessing and making claims) <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 • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals

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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 Jelf (to assist our client in assessing and making claims) <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"> • 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 Jelf (to assist with the prevention and detection of fraud) <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 • Substantial public interest (Insurance purposes) 	<ul style="list-style-type: none"> • Insurers • Lawyers • Police • Experts • Other insurers • Anti-fraud databases • 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 Jelf (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 Jelf (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 Jelf (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)



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General risk modelling	<ul style="list-style-type: none"> Legitimate interests of Jelf (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 Jelf (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
Consultancy activities		
General client care, including communications with clients	<ul style="list-style-type: none"> Performance of our contract with the individual (if he/she is the client) Legitimate interests of Jelf (to correspond with clients in order to provide consultancy services) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> Consent 	
General risk modelling in the context of our consultancy services in order to evaluate risks and provide advice	<ul style="list-style-type: none"> Legitimate interest of Jelf (to build risk models and assess the risks and necessary cover) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> Consent 	
Analysis as part of the specific consultancy advice	<ul style="list-style-type: none"> Legitimate interests of Jelf (to provide the agreed consultancy services to its clients) <p>For processing special categories of Personal Data (e.g. health information) and criminal records data:</p> <ul style="list-style-type: none"> Consent 	

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Complying with our legal or regulatory obligations in the context of our consultancy business	<ul style="list-style-type: none"> • Compliance with a legal obligation • Legitimate interests of Jelf (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 • Consent 	<ul style="list-style-type: none"> • Insurance, data protection and other regulators • Police • Insurers • Auditors
Website activities		
To communicate with you regarding any queries you raise via the website	<ul style="list-style-type: none"> • Legitimate interests of Jelf (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 Jelf (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 Jelf (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 Jelf (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