Purpose of processing	Type of information collected	Legal grounds	Disclosures
Quotation/Inception			
Establishing a client relationship, including fraud, anti-money laundering and sanctions checks	- Individual details - Risk details - Policy information - Credit and anti-fraud data - Special categories of personal data	- Performance of our contract with the individual (if they are the client) - Compliance with a legal obligation - Legitimate interests of Marsh Commercial (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) **For processing special categories of Personal Data (e.g. health information) and criminal records data:** - Substantial public interest (Insurance purposes))	Anti-fraud databases
Checking credit where we are taking any credit risk	- Individual details - Credit and anti-fraud data	Legitimate interests of Marsh Commercial (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud)	Credit reference agencies
Evaluating the risks to be covered and matching to appropriate insurer, policy and premium	- Risk details - Previous and current claims - Special categories of personal data	- Performance of our contract with the individual (if they are the client) - Legitimate interests of Marsh Commercial (to determine the likely risk profile and appropriate insurer and insurance product) **For processing special categories of Personal Data (e.g. health information) and criminal records data:** - Substantial public interest (Insurance purposes)	- Insurers - Insurance intermediaries such as brokers and aggregators - Insurance broking platform providers

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Quotation/Inception cont.			
Evaluating the risks to be covered and matching to appropriate employee benefits provider, products and price	• Risk details • Previous and current claims • Special categories of personal data	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to determine the likely risk profile and appropriate insurer and insurance product) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Substantial public interest (Insurance purposes)	• Employee health and benefits providers
Policy Administration			
General client care, including communicating with clients	• Individual details • Policy information	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Substantial public interest (Insurance purposes)	• Insurers
Collection or refunding of premiums, paying on claims, processing and facilitating other payments	• Individual details • Financial information • Policy information	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to recover debts due to us)	• Insurers • Banks • Debt recovery providers

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Policy Administration cont.			
Facilitating premium finance arrangements	• Individual details • Policy information	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (ensuring our clients are able to meet their financial obligations)	• Premium Finance Providers • Banks
Claims processing			
Managing insurance claims	• Individual details • Identification details • Financial information • Policy information • Credit and anti-fraud data • Previous and current claims • Special categories of personal data	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to assist our clients in assessing and making claims) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Substantial public interest (Insurance purposes)	• 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	• Individual details • Identification details • Financial information • Policy information • Credit and anti-fraud data • Previous and current claims • Special categories of personal data	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to assist our client in assessing and making claims) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • To establish, defend or prosecute legal claims	• Insurers • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Claims processing cont.			
Investigating and prosecuting fraud or possible criminal offences	• Individual details • Identification details • Credit and anti-fraud data • Previous and current claims • Special categories of personal data	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to assist with the prevention and detection of fraud) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • To establish, defend or prosecute legal claims • Substantial public interest (Insurance purposes)	• Insurers • Lawyers • Law Enforcement Authorities • 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	• Individual details • Identification details • Risk details • Policy information • Previous and current claims • Special categories of personal data	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to correspond with clients to facilitate the continuation of insurance cover)	• Insurers • Insurance intermediaries such as brokers and aggregators.
Throughout the insurance lifecycle			
Marketing analytics, sending marketing materials and communications including data de-identification and/or aggregation	• Individual details	• Legitimate interests of Marsh Commercial (to send marketing communications about Marsh Commercial's services and offerings by post, telephone and in other circumstances where we don't require your consent) • Consent (where required in limited circumstances)	• Insurers • Group companies • Third party marketing companies

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Throughout the insurance lifecycle cont.			
Carrying out customer satisfaction surveys and market research	• Individual details	• Legitimate interests of Marsh Commercial (to ensure quality of delivery of our services and to improve our future products and services offering)	• Third party market research companies
Transferring books of business, company sales and reorganisations	• Individual details • Identification details • Financial information • Risk details • Policy information • Credit & anti-fraud data • Previous and current claims • Special categories of personal data	• Legitimate interests of Marsh Commercial (to structure our business appropriately) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Substantial public interest (Insurance purposes) • In certain circumstances, consent	• Group companies • Courts • Purchaser (potential and actual)
General risk modelling	• Individual details • Risk details • Policy information • Previous and current claims • Special categories of personal data	• Legitimate interests of Marsh Commercial (to build risk models that allow placing of risk with appropriate insurers) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Substantial public interest (Insurance purposes)	• Insurers • Clients and prospects • Group companies

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Throughout the insurance lifecycle cont.			
Analytics include the de-identification of personal data for the purposes of analytics	• Individual details • Identification details • Risk details • Policy information • Previous and current claims • Special categories of personal data	• Legitimate interests of Marsh Commercial (to improve the way we run our business and to enhance our risk models) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Substantial public interest (Insurance purposes)	• Insurers • Clients and prospects • Group companies
Complying with our legal or regulatory obligations	• Individual details • Identification details • Financial information • Risk details • Policy information • Credit and anti-fraud data • Previous and current claims • Special categories of personal data	• Compliance with a legal obligation • Legitimate interests of Marsh Commercial (to take pre-emptive steps to ensure legal and regulatory compliance) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • To establish, defend or prosecute legal claims	• Insurance, data protection and other regulators • Law Enforcement Authorities • Insurers • Auditors

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Consultancy activities			
General client care, including communications with clients	• Individual details • Policy information	• Performance of our contract with the individual (if they are the client) • Legitimate interests of Marsh Commercial (to correspond with clients in order to provide consultancy services) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Consent	
General risk modelling in the context of our consultancy services in order to evaluate risks and provide advice	• Individual details • Risk details • Policy information • Previous and current claims • Special categories of personal data	• Legitimate interest of Marsh Commercial (to build risk models and assess the risks and necessary cover) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Consent	
Analysis as part of the specific consultancy advice	• Individual details • Risk details • Policy information • Previous and current claims • Special categories of personal data	• Legitimate interests of Marsh Commercial (to provide the agreed consultancy services to its clients) ***For processing special categories of Personal Data (e.g. health information) and criminal records data:*** • Consent	

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Consultancy activities cont.			
Complying with our legal or regulatory obligations in the context of our consultancy business	• Individual details • Identification details • Financial information • Risk details • Policy information • Credit and anti-fraud data • Previous and current claims • Special categories of personal data	• Compliance with a legal obligation • Legitimate interests of Marsh Commercial (to take pre-emptive steps to ensure legal and regulatory compliance) *For processing special categories of Personal Data (e.g. health information) and criminal records data:* • To establish, defend or prosecute legal claims • Consent	• Insurance, data protection and other regulators • Law Enforcement Authorities • Insurers • Auditors
Government support and compensation schemes			
To administer Government schemes, assess eligibility and on-board participants and handle claims for compensation	• Individual details • Identification details • Credit and anti-fraud data • Financial information • Previous and current claims • Special categories of personal data	• Legitimate interests of Marsh Commercial (acting as a third party administrator to assist the Government provide compensation to industries affected by the COVID-19 pandemic) *For processing special categories of Personal Data (e.g. health information) and criminal records data:* • Substantial public interest (Insurance purposes and statutory and government purposes)	• The UK Government • Anti-fraud databases • Credit reference agencies • Loss adjusters • Lawyers • Experts

Purpose of processing	Type of information collected	Legal grounds	Disclosures
Website activities			
To communicate with you regarding any queries you raise via the website	• Individual details • Identification details	• Legitimate interests of Marsh Commercial (to correspond with website users)	
To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud	• Individual details • Identification details	• Compliance with a legal obligation • Legitimate interests of Marsh Commercial (to ensure the quality and legality of our online services) ***For processing special categories of Personal Data and criminal records data:*** • Substantial public interest (preventing fraud)	• 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	• Individual details • Identification details	• Legitimate interests of Marsh Commercial (to provide clients, beneficiaries and claimants with content and services on the website)	