

Team	Process Name	Purpose	Data Items	Legal Basis	Third Party Receivers	Third Party Suppliers
Company Secretarial	Regulatory Reporting	Companies Act compliance (UK)	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Nationality</li> <li>Home Address</li> <li>Employer Name</li> <li>Work Address</li> <li>Home Phone number(s) - including mobile</li> <li>Work Phone number(s) - including mobile</li> <li>Home email address(es)</li> <li>Work email address(es)</li> <li>CVs/Education/qualification/work history</li> <li>Remuneration</li> <li>**Background/CRB checks - criminal offences, proceedings and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).</li> </ul>	Legal Obligation	Companies House and Lawyers that deal with Branch regulators	N/A
	Board Pack Production	Corporate governance	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Nationality</li> <li>Home Address</li> <li>Employer Name</li> <li>Work Address</li> </ul>	Legitimate Interest	N/A	PRA, Virtual boardroom

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			<ul style="list-style-type: none"> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Work email address(es)</li> <li>• CVs/Education/qualification/work history</li> <li>• Remuneration</li> <li>• **Background/CRB checks</li> </ul>			
	Maintaining Statutory Records	Companies Act compliance (UK)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Nationality</li> <li>• Home Address</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Work email address(es)</li> <li>• CVs/Education/qualification/work history</li> </ul>	Legal Obligation	Large array of lawyers which is ever changing	N/A
Company Secretarial and Legal Counsel Bermuda	Quarterly (US) MBRT filing process	Regulatory reporting	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Nationality</li> <li>• Age</li> <li>• Gender</li> <li>• Marital / Civil status</li> </ul>	Legal obligation	Drinker Biddle & Reath, US State Regulators	Collected directly from data subject

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			<ul style="list-style-type: none"> <li>• Home Address</li> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• Languages spoken</li> <li>• CVs/Education/qualification/work history</li> <li>• Contents of application forms</li> <li>• Documentation required under immigration laws (e.g. citizenship; details of residency; work permit)</li> <li>• **Background/CRB checks - criminal offences, proceedings and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).</li> <li>• **Social security number / National register number. NB - if these are collected, please confirm they are ONLY used to</li> </ul>			

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			<p>comply with applicable legal obligations and please specify that obligation</p>			
	Fit & Proper process for Directors and Officers	Regulatory compliance	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Nationality</li> <li>• Age</li> <li>• Gender</li> <li>• Marital / Civil status</li> <li>• Home Address</li> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• Languages spoken</li> <li>• CVs/Education/qualification/work history</li> <li>• Contents of application forms</li> <li>• Documentation required under immigration laws (e.g. citizenship; details of residency; work permit)</li> <li>• **Background/CRB checks - criminal offences, proceedings and sentences where this is legally required/permitted or</li> </ul>	Legal Obligation	Bermuda Monetary Authority	Collected directly from data subject

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			where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).			
	Bermuda Companies Act requirements	Companies Act compliance (Bermuda)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Nationality</li> <li>• Work Address</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• Contents of application forms</li> </ul>	Legal Obligation	Registrar of Companies	Collected directly from data subject
<b>Compliance</b>	Produce Biographical Affidavit	Complying with our legal or regulatory obligations; Directors are required to have a biographical affidavit	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Nationality</li> <li>• Age</li> <li>• Marital / Civil status</li> <li>• Home Address</li> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• CVs/Education/qualification/work history</li> <li>• Documentation required under immigration laws (e.g.</li> </ul>	Legitimate interest, Consent	All 52 state regulators in US, (e.g. NAIC), AIUK, National Association of Insurance Commissioners (NAIC), Locke Lorde LLP, Drinker Biddle and Reath LLP, Saville & Co, Notaries and legal counsel	

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			<p>citizenship; details of residency; work permit)</p> <ul style="list-style-type: none"> <li>● **Background/CRB checks - criminal offences, proceedings and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).</li> <li>● Performance reviews</li> <li>● **Beneficiaries and next of kin</li> <li>● **Social security number / National register number. NB - if these are collected, please confirm they are ONLY used to comply with applicable legal obligations and please specify that obligation</li> <li>● Passport</li> </ul>			
	Whistle Blowing	Complying with our legal or regulatory obligations; whistleblowing is the process of one member of staff formally reporting activity that is against company procedure/policy	<ul style="list-style-type: none"> <li>● Name</li> <li>● Performance reviews</li> <li>● Disciplinary and grievance</li> <li>● Address</li> </ul>	Legal Obligation	FCA, PRA, ACPR, FINRA, FINMA, JFSC, CBI, BaFin, Lloyd's, MAS, Alberta, British Columbia, Manitoba, New Brunswick, Newfoundland and Labrador,	

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					Nova Scotia, Ontario, Prince Edward Island, Quebec, Saskatchewan, All 52 state regulators in US	
DUA Operations	Onboarding a Coverholder	When DUA carry out a due diligence study on the state of the organisation that will be the Coverholder	<ul style="list-style-type: none"> <li>• Work Address</li> <li>• Work Phone number(s) - including mobile</li> <li>• CVs/Education/qualification/work history</li> <li>• References</li> </ul>	Legitimate interests	Lloyd's	Broker, Cover Holder
	Setting up a Binder	This is the creation of the Binder policy between Aspen and the Coverholder	<ul style="list-style-type: none"> <li>• Name</li> <li>• Home Address</li> <li>• Employer Name</li> <li>• Work Address</li> </ul>	Consent	PSU (Outsourcing partner for Binder input to BDX), Lloyd's	Broker
	Approve TPA for Claims delegation	This is where DUA carry out a due diligence on the proposed TPA	<ul style="list-style-type: none"> <li>• Name</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• CVs/Education/qualification/work history</li> <li>• References</li> </ul>	Legitimate interests	TPA, Lloyds	Broker, TPA, Charles Taylor
	Approve Auditors	This is where DUA carry out a due diligence on the proposed Auditors	<ul style="list-style-type: none"> <li>• Name</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• Work Phone number(s) - including mobile</li> </ul>	Consent	Lloyds, Charles Taylor	Broker

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			<ul style="list-style-type: none"> <li>• Work email address(es)</li> <li>• Languages spoken</li> <li>• CVs/Education/qualification/work history</li> <li>• Remuneration</li> <li>• References</li> </ul>			
	Risk Bordereau processing	The processing of the risks declared under the Binder	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Age</li> <li>• Marital/ Civil status</li> <li>• Home Address</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• **Health/disability/GP details - physical or mental health condition where this is legally required/permitted (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> <li>• **Beneficiaries and next of kin</li> <li>• Risk Reference</li> </ul>	Legitimate interests	PSU (Outsourcing partner for bordereau)	Brokers, Cover Holders
	Claims Bordereau processing	Where the TPA processes the Claims declared under the Binder's policies and Aspen receives the Claims Bordereau	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Age</li> <li>• Marital/ Civil status</li> <li>• Home Address</li> <li>• Employer Name</li> <li>• Work Address</li> </ul>	Legitimate interests	PSU (Outsourcing partner for bordereau)	Brokers, Cover Holders, TPA



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			<ul style="list-style-type: none"> <li>• **Health/disability/GP details - physical or mental health condition where this is legally required/permitted (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> <li>• **Beneficiaries and next of kin</li> <li>• Claims Reference</li> </ul>			
	Auditing a Coverholder	External Auditor reviews Coverholder and reports back to Aspen	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Age</li> <li>• Marital/ Civil status</li> <li>• Home Address</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• **Health/disability/GP details - physical or mental health condition where this is legally required/permitted (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> <li>• **Beneficiaries and next of kin</li> <li>• Risk Reference</li> <li>• Claims Reference</li> </ul>	Legitimate interests	Lloyd's, Broker, Coverholder	Auditor
Events	Data Collection for events	Event management together with event	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> </ul>	Legitimate Interest	Jagged Horizon's, TG SKI, Seetickets,	Any broker

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		administration and catering (if relevant)	<ul style="list-style-type: none"> <li>• Age</li> <li>• Home Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Work email address(es)</li> <li>• Dietary requirements</li> <li>• Photos (in directories etc.)</li> <li>• **Beneficiaries and next of kin</li> </ul>		Ultimate Experience, Agent Caterers(Aspen), Broadgate (Plantation Place Reception), Wembley - Account, O2 - Account, Tru-Digital, Clear Partners	
	Building Access	Information required to generate a building pass	<ul style="list-style-type: none"> <li>• Name</li> <li>• Company</li> </ul>	Legitimate interest	Agent Caterers, Plantation Place Reception, Tru-Digital(stored on Tru-mail)	N/A
Finance - Treasury	Setting up a new bank account/new platform	Banks require PII information when setting up a new bank account relationship. This process is in place to set up new bank accounts	<ul style="list-style-type: none"> <li>• Name</li> <li>• Home Address</li> <li>• Work Address</li> <li>• Work Phone number(s) - including mobile</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• Passport</li> <li>• Bank statements</li> <li>• Utility Bills</li> <li>• Driving Licence</li> <li>• National Identity Card</li> </ul>	Legitimate Interest	AIB (Allied Irish Bank), Barclays Bank, BNP Paribas, CIBC, CIBC Mellon, Citibank, Deutsche Bank, HSBC, Lloyds Bank, UBS AG, Saville & Co. (acting as Scrivener Notaries)	

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	Setting up/updating a bank mandate	Setting up bank mandate	<ul style="list-style-type: none"> <li>Name</li> <li>Work Address</li> <li>Work Phone number(s) - including mobile</li> <li>Signature</li> <li>Work email address(es)</li> </ul>	Legitimate Interest	AIB (Allied Irish Bank), Barclays Bank, BNP Paribas, BNY Mellon, CIBC, CIBC Mellon, Citibank, Deutsche Bank, HSBC, Lloyds Bank, Royal Bank of Canada, UBS AG	
	Setting up a corporate credit card for an employee	Setting up corporate credit cards.	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Gender</li> <li>Home Address</li> <li>Home Phone number(s) - including mobile</li> <li>Work Phone number(s) - including mobile</li> <li>Work email address(es)</li> <li>Contents of application forms</li> </ul>	Legitimate Interest	Barclays Bank	
	Treasury Management system	Setting up access to the Treasury Management System (Kyriba)	<ul style="list-style-type: none"> <li>Name</li> <li>Signature</li> </ul>	Legitimate Interest	Kyriba UK Ltd	
	FX Trading Platform	NI numbers required to trade forwards on the FX trading platform	<ul style="list-style-type: none"> <li>Name</li> <li>Signature</li> </ul>	Legitimate Interest	Thomson Reuters: FXAll	

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Legal UK	Legal advice to Compliance (SAR & Sanction)	Subject Access Requests or sanctions advice relating to named individuals	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Age</li> <li>Gender</li> <li>Home Address</li> <li>Work Address</li> <li>Home Phone number(s) - including mobile</li> <li>Work Phone number(s) - including mobile</li> <li>Home email address(es)</li> <li>Work email address(es)</li> <li>Languages spoken</li> <li>CVs/Education/qualification/work history</li> </ul>	Legal obligation, Legitimate interest	N/A	Data Subject
Legal US	Legal advice (as General Counsel) to the claims department	Legal advice to the claims department when necessary	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Nationality</li> <li>Age</li> <li>Gender</li> <li>Marital / Civil status</li> <li>Home Address</li> </ul>			

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			<ul style="list-style-type: none"> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• Bank details</li> <li>• Vehicle/Motoring Details</li> <li>• Documentation required under immigration laws (e.g. citizenship; details of residency; work permit)</li> <li>• **Racial or ethnic origin where this is legally required / permitted or where the employee has consented, e.g. to comply with equality and diversity requirements of national legislation</li> <li>• **Health/disability/GP details - physical or mental health condition where this is legally required/permitted or where the employee has consented (e.g. to allow statutory time off for sickness, or to enable appropriate pay/employment adjustments to be made). This may include</li> </ul>			

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			maintaining a record of disability registration number/code <ul style="list-style-type: none"> <li>• Veterans Information</li> <li>• **Social security number / National register number</li> </ul>			
	Management of consumer complaints	This process involves fulfilling the statutory requirements for complaints for any consumer complaints for all 53 jurisdictions in the US	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Nationality</li> <li>• Age</li> <li>• Gender</li> <li>• Marital / Civil status</li> <li>• Home Address</li> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• Bank details</li> <li>• Remuneration</li> <li>• **Racial or ethnic origin where this is legally required / permitted or where the employee has consented, e.g. to comply with equality and diversity requirements of national legislation</li> </ul>			

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			<ul style="list-style-type: none"> <li>● **Health/disability/GP details - physical or mental health condition where this is legally required/permitted or where the employee has consented (e.g. to allow statutory time off for sickness, or to enable appropriate pay/employment adjustments to be made). This may include maintaining a record of disability registration number/code</li> <li>● Veterans Information</li> <li>● Disciplinary and grievance</li> <li>● **Beneficiaries and next of kin</li> <li>● **Political affiliations, religious, philosophical or similar beliefs where this is legally required / permitted or where the employee has consented, e.g. to allow statutory time off for religious purposes, or to enable the payment of religion/belief-based taxes in some countries</li> </ul>			
	Cyber Security incident response	Evaluating the details of potential cyber incidents	<ul style="list-style-type: none"> <li>● Name</li> <li>● Date of birth</li> <li>● Nationality</li> <li>● Age</li> <li>● Gender</li> <li>● Marital / Civil status</li> <li>● Home Address</li> </ul>			

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			<ul style="list-style-type: none"> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Signature</li> <li>• Work email address(es)</li> <li>• CVs/Education/qualification/work history</li> <li>• Contents of application forms</li> <li>• Interview comments</li> <li>• **Results of psychometric tests or similar</li> <li>• Accepted/rejected status</li> <li>• Bank details</li> <li>• Vehicle/Motoring Details</li> <li>• Remuneration</li> <li>• Recordings of video footage / CCTV</li> <li>• Documentation required under immigration laws (e.g. citizenship; details of residency; work permit)</li> <li>• **Racial or ethnic origin where this is legally required / permitted or where the employee has consented, e.g. to comply with equality and diversity</li> </ul>			



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			<p>requirements of national legislation</p> <ul style="list-style-type: none"> <li>● **Health/disability/GP details - physical or mental health condition where this is legally required/permitted or where the employee has consented (e.g. to allow statutory time off for sickness, or to enable appropriate pay/employment adjustments to be made). This may include maintaining a record of disability registration number/code</li> <li>● **Background/CRB checks - criminal offences, proceedings and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).</li> <li>● Veterans Information</li> <li>● References</li> <li>● Performance reviews</li> <li>● **Absence records</li> <li>● Disciplinary and grievance</li> <li>● Benefits details</li> <li>● **Beneficiaries and next of kin</li> <li>● **Social security number / National register number.</li> </ul>			

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			<ul style="list-style-type: none"> <li>**Political affiliations, religious, philosophical or similar beliefs where this is legally required / permitted or where the employee has consented, e.g. to allow statutory time off for religious purposes, or to enable the payment of religion/belief-based taxes in some countries</li> </ul>			
RI Claims	Consultants claims advice and review	Assessing claims handling to ensure quality	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Nationality</li> <li>Age</li> <li>Gender</li> <li>Marital/ Civil status</li> <li>Home Address</li> <li>Signature</li> <li>Employer Name</li> <li>Work Address</li> <li>Home Phone number(s) - including mobile</li> <li>Work Phone number(s) - including mobile</li> <li>Home email address(es)</li> <li>Work email address(es)</li> <li>**Beneficiaries and next of kin</li> </ul>	Legitimate interests	Following Market (for CLASS)	Broker, Cedent, AICA, Consultant
Underwriting Operations & Claims services	Claims Adjustment - Bureau	Claims adjustment	<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Nationality</li> <li>Age</li> </ul>	Legitimate interests	Broker, Lawyers, Loss Adjusters, Third Party Experts, Following	TPA, Broker, Coverholder, Loss Adjuster,

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			<ul style="list-style-type: none"> <li>• Gender</li> <li>• Marital/ Civil status</li> <li>• Home Address</li> <li>• Signature</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• Home Phone number(s) - including mobile</li> <li>• Work Phone number(s) - including mobile</li> <li>• Home email address(es)</li> <li>• Work email address(es)</li> <li>• Languages spoken</li> <li>• CVs/Education/qualification/work history</li> <li>• Contents of application forms</li> <li>• Interview comments</li> <li>• Results of psychometric tests or similar**</li> <li>• Accepted/rejected status</li> <li>• Bank details</li> <li>• Vehicle/ Motoring Details</li> <li>• Remuneration</li> <li>• IT system log data / web log data / other electronic identification data (including device data)</li> <li>• Leisure interests and hobbies</li> <li>• Recordings of video footage / CCTV</li> <li>• Photos (in directories etc.)</li> </ul>		markets (when ASPEN leading or 2 <sup>nd</sup> on Slip)	Lawyers, Insured

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			<ul style="list-style-type: none"> <li>• Documentation required under immigration laws (e.g. citizenship; details of residency; work permit)</li> <li>• ** racial or ethnic origin where this is legally required / permitted or where the employee has consented, e.g. to comply with equality and diversity requirements of national legislation (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> <li>• **Health/disability/GP details - physical or mental health condition where this is legally required/permitted or where the employee has consented (e.g. to allow statutory time off for sickness, or to enable appropriate pay/employment adjustments to be made). This may include maintaining a record of disability registration number/code (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> <li>• **Background/CRB checks - criminal offences, proceedings</li> </ul>			

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			<p>and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).</p> <ul style="list-style-type: none"> <li>● References</li> <li>● Performance reviews</li> <li>● **Absence records</li> <li>● Disciplinary and grievance</li> <li>● Attachment of earnings</li> <li>● Benefits details</li> <li>● **Beneficiaries and next of kin</li> <li>● **Social security number / National register number. NB - if these are collected, please confirm they are ONLY used to comply with applicable legal obligations and please specify that obligation</li> <li>● **Trade Union Membership (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> <li>● **Sexual life and sexual orientation (Special category and therefore prohibited unless falls under one of the exceptions - see instructions tab)</li> </ul>			

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			<ul style="list-style-type: none"> <li>• Previous claim history</li> <li>• Surveillance Details</li> <li>• Yachts</li> </ul>			
	Onboarding of TPA	TPA assessed for its suitability to carry out claims adjustment on behalf of Aspen	<ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Employer Name</li> <li>• Work Address</li> <li>• Work Phone number(s) - including mobile</li> <li>• Work email address(es)</li> <li>• CVs/Education/qualification/work history</li> <li>• **Background/CRB checks - criminal offences, proceedings and sentences where this is legally required/permitted or where the employee has consented (e.g. to protect the safety and security of staff and customers, or for insurance purposes).</li> </ul>	Legitimate interests	Each TPA service provider with whom contract is entered into, Auditors / lawyers	TPA
	TPA Audit	External auditor to carry out the audit of TPA (Third Party Administrator)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Age</li> <li>• Gender</li> <li>• Marital/ Civil status</li> <li>• Employer Name</li> </ul>	Legitimate interests	Audited service provider, auditor, Lawyer	External Auditor