

Chubb Insurance New Zealand Limited Privacy Policy (Policy)

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Chubb Insurance New Zealand Limited Privacy Policy (Policy)

1. Definitions in this Policy

In this Policy “We”, “Our” and “Us” means Chubb Insurance New Zealand Limited (Chubb).

“You” and “Your” refers to Our customers and prospective customers as well as those who use Our website.

“Chubb Group of Companies” means other Chubb entities which may be located outside New Zealand, such as in Australia or Philippines or at regional head offices of Chubb located in Singapore, UK or USA.

What is Personal Information?

Personal information means information that can identify a person or is capable of identifying a person.

What are Unique Identifiers?

Unique identifiers are usually a set of numbers or a combination of numbers and letters issued by government and commercial agencies to identify individuals.

2. Our Commitment

We value Our partners and Our customers’ trust in Us and We are committed to maintaining the confidentiality and privacy of Your Personal Information. This Policy details how We collect, disclose and handle Your Personal Information in accordance with the requirements of New Zealand’s Privacy Act, as amended or replaced from time to time (Privacy Act).

To read a snapshot of this Policy, please refer to Our Privacy Statement which is available within Our product documents and application forms and on Our website <https://www.chubb.com/nz-en/footer/privacy.html> or contact Us.

3. Your decision to provide information

If You do not provide Us with Your Personal Information, We may not be able to provide You or Your organisation with insurance, respond to any claim, or offer other products and services to You or Your organisation.

4. Keeping Our Policy up to date

Our Policy may change from time to time and where this occurs, the updated Policy will be posted to Our website <https://www.chubb.com/nz-en/footer/privacy.html>.

5. Why We collect Your Personal Information?

In the course of offering products and services to You and Your organisation, including providing insurance products and processing insurance claims, We need to collect Your Personal Information to administer Our business functions and activities. Generally, We will collect Your Personal Information for the following reasons:

- a) maintaining and administering Our insurance products and services (for example processing requests for insurance quotes, applications for insurance, underwriting and pricing policies, issuing You with a policy, assessing and managing claims, complaints handling and processing payments);
- b) marketing services and products provided by Us or those We have an association with, that might be of interest to You (direct marketing);
- c) improving Our services and products e.g. training and development of Our representatives, product and service research and data analysis and business strategy development;
- d) to gather data about the usage of Our website, products, applications and other platforms for research, marketing, product development and other purposes (for example, the data may be used to enhance user experience so that You do not have to provide certain information every time You return to Our website).

6. The types of Personal Information that We collect

The Personal Information We usually collect and hold depends on the type of product and/or service sought, but generally includes:

- a) contact information such as Your name, address details, and contact numbers and email address;
- b) Your date of birth and gender;
- c) Your prior insurance history;
- d) information relevant to Our products or services, for example in respect of a travel policy we will ask what countries you are travelling to and in respect of group personal accident and sickness policy claims, we may need details of injuries sustained;
- e) information related to Your claims, including the circumstances which led to the claim;
- f) other information such as Your opinions, statements and endorsements collected from You or through surveys, questionnaires, and Your other interactions with us (such as in online or telephone queries);
- g) recordings of phone calls to our representatives and call centres; and
- h) any relevant payment or billing information, such as bank account details, direct debit and credit card details or premium funding and insurance payment arrangements.

Unique Identifiers

We may sometimes collect details of Unique Identifiers that have been assigned to You by other companies or government organisations for the purpose of carrying out our business functions.

7. How We collect Your Personal Information

Directly

We collect Your Personal Information from You in various ways and at various points of interaction with Us, such as when you apply for one of Our products or services or make a claim. We will collect Your Personal Information via Our website or partner websites, by telephone, facsimile or email, when you enter a competition or voluntarily participate in a survey or when you provide us with information (such as on an application form or claim form).

We will generally collect Your Personal Information directly from You except when it is unreasonable or impracticable for Us to do so, or as otherwise provided under this Privacy Policy.

Indirectly

In so far as they relate to Our services and activities, We may collect Personal Information about You indirectly from other parties that are relevant to our business, a policy or claim, such as:

- a) policyholders or others who are authorised or noted on the policy as having a legal interest in it;
- b) Your employer (e.g. in the case of a group insurance policy);
- c) family members, agents, brokers or anyone else You have authorised to deal with Us on Your behalf;
- d) insurance intermediaries including current and previous distributors, brokers, referrers such as clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- e) medical providers and health care workers;
- f) Financial Services Complaints Limited or other external dispute resolution body;
- g) Witnesses, service providers or other third parties in relation to claims;
- h) premium funders;
- i) Your previous insurers;
- j) other insurers or parties involved in the policy or claim such as EQC;
- k) publicly available sources such as social media, and other networks where people publicly share and exchange information; and
- l) Chubb Group of Companies and any other person who We enter into a business alliance with.

You authorise Us to obtain Your Personal Information from these third parties.

Our website

By using Our website You also agree to [Our Terms of Use](#) and acknowledge that We may use cookies to provide a number of services to you. Cookies are text files which are stored on Your computer so that each time You visit a web page Your IP address and the name of the website You visited is recorded. The next time You visit the same web site, the text file communicates that You have been there before and the website may tailor the content, such as pop ups, to You. Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from Chubb websites and apps and elsewhere on the internet and use that information to provide measurement services and target advertisements to you.

Your cookie choices

You can enable or disable cookies by adjusting your browser settings. This allows you to reject the placement of all cookies (except strictly necessary cookies). You can also delete cookies which have already been placed on your device.

Please remember that disabling or deleting some or all cookies may prevent some web services (including on this website) from functioning correctly, and may lead to a less smooth or less personalized browsing experience.

You should visit the "Help" section of your browser for how to manage your cookie settings, or follow the links below:

- Microsoft Edge:
<https://support.microsoft.com/en-nz/help/4027947>

- Internet Explorer:
<http://support.microsoft.com/en-us/help/260971/description-of-cookies>
- Mozilla Firefox:
<http://support.mozilla.com/en-US/kb/Cookies>
- Google Chrome:
<http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- Safari:
<http://support.apple.com/kb/PH5042>
- Opera:
<https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/>

For further general information on cookies and more detailed advice on how to disable and enable them please go to <http://www.allaboutcookies.org>.

Opting out of third party ad networks

You may opt out of many third-party ad networks. For example, you may go to the Digital Advertising Alliance (“DAA”) [Consumer Choice Page](#) for information about opting out of interest-based advertising and their choices regarding having information used by [DAA companies](#). You may also go to the Network Advertising Initiative (“NAI”) [Consumer Opt-Out Page](#) for information about opting out of interest-based advertising and their choices regarding having information used by [NAI members](#).

Opting out from one or more companies listed on the DAA [Consumer Choice Page](#) or the NAI [Consumer Opt-Out Page](#) will opt you out from those companies’ delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising on other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on the DAA or NAI websites, your opt out may not be effective. Additional information is available on the DAA’s website at www.aboutads.info or the NAI’s website at www.networkadvertising.org.

Third party platforms

Sometimes We use third party platforms to deliver and collect information. These are sites hosted and managed by organisations other than Ourselves. Before deciding to contribute to any third party site, You should consult the privacy policies relevant to the host site.

8. Sharing, disclosing and using Your Personal Information

We will only use and disclose Your Personal Information for the purpose it was given to us, or as otherwise permitted by law, and will not share it with any other unrelated party except in accordance with this Policy and under the following circumstances:

- a) if disclosure is required by an industry body or by law or requested by a statutory, regulatory or ombudsman authority, government agency or dispute resolution scheme;
- b) where You have consented to the use or disclosure, which may be given expressly or may be reasonably implied by Your conduct. For example, where access to Our products has been facilitated through a third party, You consent through your actions that We may share Your information with that third party. Third parties can include an insurance broker, marketing agency, airline, travel agent, referring agent, authorised representative, distributor, mortgage broker, sporting association, member club or association, credit facility/provider etc.
- c) where it is necessary for a third party to assist Us in providing Our services, provide professional advice to Us or provide additional services to You, for example, a mailing house, reinsurers, insurance intermediaries, insurance reference bureau, lawyers, accountants, loss adjusters and others involved in the claims handling process, non-insurance related partner service providers etc;
- d) where other third parties are involved in a policy or claim, such as EQC, other insurers or service providers;
- e) information given to the policy holders, where you are an insured person, but not the policy holder;
- f) for purposes related to research (including market research), planning, service development, security, testing and risk management;

- g) if disclosure is required for the purpose of conducting business analysis in order to improve Our products and services including direct marketing (see below).

Related (including other Chubb group companies) and unrelated third parties to whom Your Personal Information is disclosed are required to keep the information confidential and only use it for the same purposes We are permitted to use it. This can include third parties promoting services and products provided by Us or those We have an association with, that might be of interest to You. These parties may also combine the Personal Information We disclose to them with information they already hold about You subject to their own privacy policy, in order to provide You with more relevant advertising about Our or their own products and services.

Direct Marketing

We may from time to time engage in direct marketing activities to advise You about or offer You products or services that may be of interest to You. Personal Information You or an associated party have provided Us will be held on file for marketing purposes. You may opt out of receiving such information.

Where We have collected Your Personal Information from a third party, that Personal Information may be used or disclosed for direct marketing if:

- a) You have consented to its use or disclosure, or
- b) You were provided with the option to opt-out of direct marketing communications or were otherwise made aware that You could make such a request; and
- c) You did not make such a request to opt-out of direct marketing communications.

Overseas Entities

In some circumstances, in order to provide Our services to You, We may need to disclose Personal Information to other entities within the Chubb Group of Companies which may be located outside New Zealand, such as in Australia or Philippines or at regional head offices of Chubb located in Singapore, UK or USA. We may also need to transfer Your Personal Information to third parties with whom We or the Chubb Group of Companies have subcontracted to provide specific services for Us (such as claims handling) who are located outside New Zealand (such as the Philippines or USA). These entities and their locations may change from time to time. You can contact Us for details.

In circumstances where We disclose Your Personal Information to the Chubb Group of Companies or third parties outside of New Zealand, We have contractual provisions in place requiring these entities to protect Your Personal Information against unauthorised disclosure, misuse or loss in a way that, overall, provides comparable safeguards to the Privacy Act.

9. How We store, secure and destroy Your Personal Information

Storage

We hold Personal Information within Our own data storage devices or with third party providers of data storage (which may be outside of New Zealand).

Security

We recognise that You may be concerned about the security and confidentiality of the Personal Information provided to Us. We implement reasonable security safeguards to protect the security of Personal Information from:

- a) misuse or loss; and
- b) unauthorised access, use, modification or disclosure.

These steps include password protection for accessing Our electronic IT systems, securing paper files in locked cabinets and physical access restrictions.

In relation to Our own servers, We take all reasonable steps to manage data stored on Our servers to ensure data security. In relation to data stored on third party providers of data storage, We have contractual provisions in place requiring these entities to protect the information in a way that, overall, provides comparable safeguards to those in the Privacy Act.

Document Destruction

We will take such steps as are reasonable in the circumstances to destroy or de-identify Personal Information, in a secure manner, when it is no longer needed or required to be retained by law or Court/tribunal order in accordance with our internal policy and procedure.

10. Quality of Your Personal Information

When We deal with You We will take reasonable steps to confirm the details of the Personal Information We hold about You and ask You if there are any changes required.

The accuracy of Personal Information depends largely on the information You provide to Us, so We rely on You to:

- a) promptly inform Us of changes to Your Personal Information (such as Your name or address); and
- b) let Us know if You become aware of any errors in Your Personal Information that We hold.

11. Access to and correction of Your Personal Information

You can generally access the Personal Information We hold about You and if required request corrections.

If you wish to access or correct any Personal Information We hold about You, please complete the Personal Information Request Form available on Our website or by contacting Our Privacy Officer. In all cases We will need to verify Your identity before actioning any request. We will respond to a request for access or correction within a reasonable period after receipt of the request.

If We refuse access or to give access in a manner requested by You, We will provide written reasons together with guidance on how You can make a complaint about the refusal.

If We do not agree to make the requested changes to the Personal Information held, We will provide You with Our written reasons and You will have an opportunity to provide a statement as to why the information should be changed or corrected.

Where We have previously disclosed Your Personal Information to a third party and You request Us to notify the other party of the correction, We will take reasonable steps to provide the notification, unless it is impracticable or unlawful for Us to do so.

Cost of access and corrections

We will not usually charge for a request to access or change Your Personal Information. However, if We decide to apply a charge for providing the information, this will be limited to Our reasonable costs in locating (for example from archives) and compiling the information.

12. Privacy complaints process

If You are not satisfied with Our response to Your enquiry or complaint or where You have any concerns about Our treatment of Your Personal Information or where You believe there has been a breach of this Privacy Policy, You should contact Our Privacy Officer clearly setting out the nature of Your concern. The contact details are at the end of this Policy.

In the event of a privacy complaint, it will be reviewed and considered by someone with the appropriate authority to deal with the complaint. We will investigate Your complaint and keep You informed of the progress of Our investigation. We will respond to Your complaint in writing within ten (10) business days provided:

- a) We have all necessary information; and
- b) We have completed any investigation required.

In cases where further information or investigation is required, We will work with You to agree reasonable alternative time frames and, if We cannot agree, You may request that Your complaint is referred to Our internal dispute resolution team. We will otherwise keep You informed about the progress of Our response at least every twenty (20) business days, unless You agree otherwise.

If You advise us that You are not satisfied with Our response to Your complaint, Your complaint will be reviewed by members of Our internal dispute resolution team, who are independent to Our complaint handling team and are committed to reviewing disputes objectively, fairly and efficiently. We will respond to Your dispute in writing within twenty (20) business days, provided We have all necessary information and have completed any investigation required. In cases where further information or investigation is required, We will work with You to agree reasonable alternative time frames. If We cannot agree, You may seek a further review as detailed below.

Further review of any privacy complaint

If You remain dissatisfied with Our review, You may take the complaint to the Privacy Commissioner. The Privacy Commissioner has the power to investigate complaints and recommend appropriate action to remedy privacy complaints and can be contacted at:

Privacy Commissioner, New Zealand

PO Box 10094
Wellington 6143
0800 803 909
<https://www.privacy.org.nz/>

13. Contact Us

Please contact Our Privacy Officer if You wish to:

- make a complaint;
- gain access to Your Personal Information;
- correct or update Your Personal Information;
- withdraw Your consent to any of the uses of Your information including receiving offers of products or services from Us or persons We have an association with; or
- receive a copy of this Policy by email, post or some other form,

and We will do Our best to accommodate Your request.

Contact **The Privacy Officer**
Address: Chubb Insurance New Zealand Limited
 PO Box 734
 Auckland
Email privacy.nz@chubb.com
Phone + 64 (9) 377 1459

About Chubb in New Zealand

Chubb is the world's largest publicly traded property and casualty insurer. Chubb's operation in New Zealand (Chubb Insurance New Zealand Limited) offers corporate Property & Casualty, Group Personal Accident and corporate Travel Insurance products through brokers.

More information can be found at www.chubb.com/nz.

Contact Us

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Financial Services Provider No. 35924

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