

Chubb Insurance New Zealand Limited Privacy Policy

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Chubb Insurance New Zealand Limited Privacy 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 individuals from whom We collect Personal Information.

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

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

“Policy” means this Chubb Insurance New Zealand Limited Privacy Policy.

“Privacy Act” means the *Privacy Act 2020* as amended or replaced from time to time.

“Unique Identifiers” means an identifier other than the individual’s name that uniquely identifies an individual, such as a set of numbers or a combination of numbers and letters issued by other companies or government organisations to identify individuals.

2. Our commitment

We value Your trust in Us and We are committed to maintaining the confidentiality and privacy of Your Personal Information. This Policy details how We collect, hold, store, use, disclose, retain, give access to and correct Your Personal Information in accordance with the requirements of the 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, on Our website <https://www.chubb.com/nz-en/footer/privacy.html> or by contacting Us.

3. Your decision to provide Personal 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) to maintain and administer Our insurance products and services, for example, Your Personal Information may be required for Us to:
 - process requests for insurance quotes and applications for insurance;
 - underwrite and price policies;
 - issue, renew or amend the terms of a policy;
 - assess and manage claims;
 - handle complaints; and
 - process payments;
- b) to comply with legislation, regulations, and industry codes that are applicable to Us such as sanctions requirements;
- c) to market services and products provided by Us or those We have an association with, that might be of interest to You (direct marketing);
- d) to improve Our services and products, for example, Your Personal Information may be used for quality assurance, the training and development of Our representatives, to conduct product and service research and data analysis and for business strategy development; and
- e) to gather data about the usage of Our website, products, applications and other platforms for research, marketing, product development and other purposes (for example, Your Personal Information 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, telephone number 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 telephone calls between You and 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 and activities.

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 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 not reasonably practicable in the circumstances for Us to do so, or as otherwise provided under this Policy.

Indirectly

In so far as it relates to Our functions 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 bodies;
- g) witnesses, service providers or other third parties in relation to claims;
- h) witnesses, service providers or other third parties in relation to complaints;
- i) premium funders;
- j) Your previous insurers;
- k) other insurers or parties involved in the policy or claim such as Toka Tū Ake EQC (EQC);
- l) publicly available sources such as social media, and other networks where people publicly share and exchange information; and
- m) the Chubb Group of Companies and any other person or organisations who We enter into a business alliance with.

You authorise Us to collect, hold, store, use, disclose and retain Your Personal Information that We receive from these third parties in accordance with this Policy, for the purposes of administering Our business functions and activities.

Where You provide Us with Personal Information about any person, You confirm that You have the authority of that person to disclose such information and to authorise Us to collect, hold, store, use, disclose and retain the Personal Information in accordance with this Policy, for the purposes of administering Our business functions and activities.

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 Our website) from functioning correctly, and may lead to a 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>
- 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 <http://www.aboutads.info> or the NAI's website at <http://www.networkadvertising.org>.

Third party platforms

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

8. Using and disclosing 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 disclose it to any other 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, the Insurance Claims Register, lawyers, accountants, loss adjusters and other parties 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 Toka Tū Ake 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) for the purpose of conducting business analysis in order to improve Our products and services including direct marketing (see below).

Related (including other Chubb entities within the Chubb Group of 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 the Philippines or at regional head offices of Chubb located in Singapore, the UK or the 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. 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 access, use, modification and disclosure, as well as 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 and 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 Personal Information stored on Our servers to ensure data security. In relation to Personal Information stored on third party providers of data storage, We have contractual provisions in place requiring these entities to protect Your Personal 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 to give access in a manner requested by You, We will provide You with Our written reasons together with guidance on how You can make a complaint about the refusal.

If We refuse to make the requested changes to the Personal Information held, We will provide You with Our written reasons together with guidance on how You can make a complaint about the refusal as well as advising You of Your entitlement to provide a statement of the correction sought and to request that it be attached to the information.

Where We have previously disclosed Your Personal Information to a third party and You request Us to notify the third 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 correct Your Personal Information. However, if We decide to apply a charge for providing access to Personal Information or attaching a statement of correction to Personal Information, this will be limited to Our reasonable costs (for example in locating and compiling the information from archives).

12. Privacy complaints process

If 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.

Privacy complaints 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 that:

- 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. 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 ten (10) business days of the date 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 and provide an update at least once every 20 business days, or another time interval agreed with You. 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:

Office of the 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 use or disclosure of Your Personal Information including receiving offers on products or services from Us or organisations We have an association with; or
- receive a copy of this Policy by email, post or some other form.

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

Chubb Insurance New Zealand Limited
CU1-3, Shed 24
Princes Wharf
Auckland 1010
PO Box 734, Auckland 1140
O +64 9 377 1459
F +64 9 303 1909
www.chubb.com/nz

Company No. 104656
Financial Services Provider No. 35924

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