

# Chubb Insurance Australia Limited Privacy Policy (Policy)

CHUBB<sup>®</sup>

# Chubb Insurance Australia Limited

## Privacy Policy (Policy)

### 1. Definitions in this Policy

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In this Policy “We”, “Our” and “Us” means Chubb Insurance Australia 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 who may be located outside Australia, such as the offices of Chubb located in Singapore, UK or USA.

#### **What is Personal Information?**

Personal Information is defined in the Privacy Act 1988 (Cth) and is essentially information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

Personal Information includes sensitive information which can include information or an opinion about a person’s:

- a) racial or ethnic origin;
- b) trade or professional association or a trade union;
- c) criminal record;
- d) health/medical, genetic or biometric information or templates.

### 2. Our Commitment

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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 the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

### 3. Your Consent

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In dealing with Us, You agree to Us using and disclosing Your Personal Information in accordance with this Policy. This consent remains valid unless You alter or revoke it by giving written notice to Us. However, should You choose to withdraw Your consent, it is important for You to understand that this may mean We may not be able to provide You or Your organisation with Our insurance products and services, or to respond to Your claim.

#### **Anonymity and pseudonymity**

Where possible, You have the option of interacting with Us anonymously or using a pseudonym. For example You may use some of Our online facilities without having to reveal any Personal Information however it will generally be impracticable for You to deal with Us anonymously or use a pseudonym if You wish to use Our services or have Us arrange an insurance product for You.

### 4. Keeping Our Policy up to date

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Our Policy may change from time to time and where this occurs, the updated Policy will be posted to Our [website](#).

### 5. Why We collect Your Personal Information?

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In the course of providing insurance products and processing insurance claims, We may collect Your Personal Information to administer Our associated business functions and activities. Generally, We 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, managing claims, complaints handling , processing payments etc);
- b) marketing services and products provided by Us or those We have an association with, that might be of interest to You (for example: direct marketing);
- c) improving Our services and products (for example: training and development of Our representatives, product and service research, data analysis and business strategy development etc);
- 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

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

- a) contact information (for example: Your name, address details, contact numbers, email address etc);
- b) details relating to Your employment and employment history (for example: remuneration, hours worked, duties performed etc);
- c) Your date of birth and gender;
- d) Your financial situation;
- e) Your prior insurance history;
- f) information relevant to Our products or services;
- g) other information such as Your opinions, statements and endorsements collected from You or through surveys and questionnaires that You've completed through third parties engaged by Us; 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.

We are likely to collect sensitive information about You when determining Your eligibility for insurance cover, providing You with a quote for an insurance policy, updating an insurance policy or administering a claim under an insurance policy.

The type of sensitive information We are likely to collect can include details of Your:

- a) criminal record;
- b) health/medical information; and
- c) membership of a professional or trade association.

## 7. How We collect Your Personal Information

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We collect Your Personal Information when You complete an application form for one of Our products or services and forward it to Us directly or through an intermediary. Other means by which we may collect your Personal Information include (but are not limited to):

- a) insurance intermediaries and service providers engaged by Us or a third party who partners with Us, including Our distributors, brokers, referrers including clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- b) policyholders or others who are authorised or noted on the policy as having a legal interest in it (such as Your employer, in the case of group policies);
- c) family members, agents or anyone else You have authorised to deal with Us on Your behalf;
- d) medical providers and health care workers;
- e) the Financial Ombudsman Service or other external dispute resolution bodies;
- f) witnesses in relation to claims;
- g) Our website or partner websites;
- h) Our mobile phone applications or that of Our partners;
- i) telephone;
- j) facsimile;
- k) when You enter a competition or when You voluntarily participate in a survey.

We attempt to limit the collection and use of sensitive information from You unless We require it to provide Our services to You.

### **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:

- 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:  
<http://www.opera.com/browser/tutorials/security/privacy/>

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](http://www.aboutads.info) or the NAI’s website at [www.networkadvertising.org](http://www.networkadvertising.org).

### **Third party platforms**

Sometimes We use third party platforms (for example: a partner website or mobile device application) to deliver and collect information. These are platforms hosted and managed by organisations other than ourselves. Before deciding to contribute to any third party platform, You should consult the privacy policies relevant to that third party site.

### **Unsolicited Personal Information**

Unsolicited Personal Information can be characterised as information that We receive but have not taken active steps to collect. An example would be documents You attach to an insurance application or claim form not requested or needed by Us.

Where We receive unsolicited Personal Information, We will destroy or de-identify the information as soon as it is practicable, but only if it is lawful and reasonable to do so.

## 8. Sharing, disclosing and using Your Personal Information

We will only use Your Personal Information for the purpose it was given to us and will not share it with 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;
- b) where You have consented to the use or disclosure– which may be given expressly or may reasonably be 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) for purposes related to: research (including market research), planning, service development, security, testing and risk management;
- e) if disclosure is required for the purpose of conducting business analysis in order to improve or promote Our products and services including direct marketing (see below).

Related 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 third 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 until you opt out of receiving such information.

We may use or disclose Your Personal Information for direct marketing purposes if:

- a) the information has been collected from You directly;
- b) You would reasonably expect that the Personal Information would be used or disclosed for that purpose;
- c) We have provided You with a simple means by which You can easily request not to receive direct marketing communications; and
- d) You have not made such a request not to receive direct marketing communications.

Third party marketing service providers may combine the personal information We disclose to them with information they already hold about You, in order to serve You with more relevant advertising about Our products and services.

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 if it was impracticable to obtain Your consent; 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.

If You request confirmation of the source of Your Personal Information used by Us for direct marketing purposes, We will endeavour to provide it to You within a reasonable period, unless it is impracticable or unreasonable for Us to do so.

We will not use or disclose Your sensitive information for direct marketing purposes without Your consent.

### **Overseas Entities**

In some circumstances, in order to provide Our services to You, We may need to disclose Your Personal Information to other entities within the Chubb Group of Companies who may be located outside Australia, such as the 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 Australia (such as the Philippines or USA). These entities and their locations may change from time to time. Please contact us, if you would like a full list of the countries in which these third parties are located.

In circumstances where We disclose Your Personal Information to the Chubb Group of Companies or third parties outside of Australia, We have contractual provisions in place requiring these entities to comply with the requirements of the APPs in order to protect Your Personal Information against unauthorised disclosure, misuse or loss.

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

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### **Storage**

We hold Personal Information within Our own data storage devices or with a third party provider of data storage including those outside of Australia.

### **Security**

We recognise that You may be concerned about the security and confidentiality of the Personal Information provided to Us. We will take such steps as are reasonable in the circumstances to protect the security of Personal Information from:

- a) misuse, interference or loss; and
- b) unauthorised access, 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 data stored on Our own servers, We take all reasonable steps 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 comply with the requirements of the APPs in order to protect Your Personal Information against unauthorised disclosure, misuse or loss.

### **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. Mandatory data breach reporting**

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In accordance with Our obligations under the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth) (**Privacy Amendment Act**) We will notify the Information Commissioner and You if We have reasonable grounds to believe there is an "eligible data breach", which occurs when:

- a) there is unauthorised access to, or unauthorised disclosure of, information held by Us; or
- b) information is lost in circumstances where unauthorised access to, or unauthorised disclosure of, information is likely to occur; and
- c) a reasonable person would conclude that the access or disclosure would be likely to result in serious harm to You.

Serious harm, in this context, could include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation and other forms of serious harm that a reasonable person in Our position would identify as a possible outcome of the data breach.

We will undertake an assessment of the circumstances within 30 days of becoming aware of the breach to determine if the breach is likely to cause You serious harm.

If after concluding Our assessment We believe that there are reasonable grounds that the relevant circumstances amount to an eligible data breach, We will notify the Information Commissioner and You in writing as soon as practicable. The notification will include:

- a) Our identity and contact details;
- b) a description of the serious data breach;
- c) the kinds of information concerned; and
- d) recommendations about the steps that You should take in response to the serious data breach.

### **Exceptions to mandatory reporting**

In accordance with the exceptions provided for under the Privacy Amendment Act, We will **not** notify You of a data breach if:

- a) We have taken remedial action after identifying an eligible data breach and the remedial action means it's unlikely the incident will result in serious harm to You; or
- b) the data the subject of the breach is co-held with one of Our business partners and they have already reported the breach to You and the Information Commissioner; or
- c) the Information Commissioner has granted an exemption.

## **11. Quality of Your Personal Information**

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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.

## **12. Access to and correction of Your Personal Information**

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Generally, You can access the Personal Information We hold about You and if required request corrections. This right is subject to some exceptions set out in the APPs.

When You seek to access or correct any Personal Information We hold about You, You should contact Us by using and following the instructions on the [Personal Information Request Form](#) available on Our [website](#) or by contacting Our Customer Relations Team. 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 to give You access or 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 that 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 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 and compiling the information.

## **13. Privacy complaints process**

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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 fifteen (15) 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 ten (10) 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 keep You informed of the progress of Our review of Your dispute at least every ten (10) business days and will respond to Your dispute in writing within fifteen (15) 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 Australian Financial Complaints Authority (AFCA) (subject to its Rules) or to the Office of the Australian Information Commissioner (OAIC). The OAIC has the power to investigate complaints and recommend appropriate action to remedy privacy complaints. The contact details for these bodies are as follows:

#### **Australian Financial Complaints Authority (AFCA)**

GPO Box 3  
Melbourne VIC 3001  
1800 931 678  
<http://www.afca.org.au/>

#### **Office of the Australian Information Commissioner**

GPO Box 5218  
Sydney NSW 2001  
1300 363 992  
<https://www.oaic.gov.au/>

## 14. Contact Us

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Please contact Our **Customer Relations Team** on 1800 815 675 or [Customer.Service.AUNZ@chubb.com](mailto:Customer.Service.AUNZ@chubb.com), if you wish to:

- 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;
- request a copy of this Policy by email, post or some other form and We will do Our best to accommodate Your request.

To request access to, update or correct your personal information held by Chubb, please complete this [Personal Information Request Form](#) and return it to:

Where your request concerns **Chubb Insurance Australia Limited** please return the form to:

Email [CustomerService.AUNZ@chubb.com](mailto:CustomerService.AUNZ@chubb.com)

Fax + 61 2 9335 3467

Address GPO Box 4907 Sydney NSW 2001

Where your request concerns **Combined Insurance** please return the form to:

[customer@combined.com.au](mailto:customer@combined.com.au)

+61 2 3322 2096

PO Box 403 North Sydney NSW 2059

Please contact **Our Privacy Officer**, if You:

- have a complaint about a breach of Your privacy; or
- have a query relating to Our Privacy Policy.

Contact **The Privacy Officer**  
Chubb Insurance Australia Limited  
Address GPO Box 4065  
Sydney NSW 2001  
Email [privacy.au@chubb.com](mailto:privacy.au@chubb.com)  
Phone + 61 2 9335 3200

## About Chubb in Australia

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Chubb is the world's largest publicly traded property and casualty insurer. Chubb, via acquisitions by its predecessor companies, has been present in Australia for almost 100 years. Its operation in Australia (Chubb Insurance Australia Limited) provides specialised and customised coverages include Marine, Property, Liability, Energy, Professional Indemnity, Directors & Officers, Financial Lines, Utilities as well as Accident & Health, for a broad client base, including many of the country's largest companies.

More information can be found at [www.chubb.com/au](http://www.chubb.com/au)

## Contact Us

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**Chubb. Insured.<sup>SM</sup>**