

# Chubb Insurance Australia Limited Privacy Policy

CHUBB®



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# Chubb Insurance Australia Limited

## Privacy 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 individuals from whom We collect Personal Information.

“**Chubb Group of Companies**” means other Chubb entities who may be located outside Australia, such as the offices of Chubb located in the Philippines, Singapore, the UK or the USA.

“**Privacy Act**” means the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**) as amended or replaced from time to time.

“**Personal Information**” is defined in the Privacy Act 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 an individual’s:

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

“**Policy**” means this Chubb Insurance Australia Limited Privacy Policy.

### 2. Our Commitment

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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, retain, give access to and correct Your Personal Information in accordance with the requirements of the Privacy Act and the APPs.

### 3. Your Decision To Provide Your Personal Information

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In dealing with Us, You agree to provide Us with Your Personal Information, which will be stored, used and disclosed by Us in accordance with this Policy. You do not have to provide Us with Your Personal Information. However, should You choose not to, it is important for You to understand that this may mean that 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.

#### Anonymity and pseudonymity

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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 on 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) 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 You with a policy and renew or amend its terms;
- assess and manage claims;
- handle complaints;
- process payments etc;

b) to market 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) to improve Our services and products (for example – train and develop 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); and

to comply with legislation, regulations and industry codes that are applicable to Us such as sanctions requirements.

## 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, such as Your name, address, telephone 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, for example in respect of a travel policy We will ask what countries You are travelling to;

- g) information related to Your claim, including the circumstances which led to the claim;
- h) 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
- i) 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 will request your consent to collect sensitive Personal 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 types of sensitive Personal Information We are likely to collect can include details of Your:

- a) criminal record;
- b) health/medical information (for example – in respect of group personal accident and sickness policy claims, We may need details of injuries sustained); and
- c) membership of a professional or trade association.

## 7. How We Collect Your Personal Information

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### Directly

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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, Our mobile phone applications, 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

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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) 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) anyone You have authorised to deal with Us on Your behalf (such as family members, agents or lawyers etc);
- d) medical providers and health care workers;
- e) the Australian Financial Complaints Authority (**AFCA**) or other external dispute resolution bodies;
- f) witnesses, service providers or other third parties in relation to claims;
- g) witnesses, service providers or other third parties in relation to complaints;
- h) the Chubb Group of Companies;

- i) any other person or organisations who We enter into a business alliance with, including partner websites and partners' mobile phone applications;
- j) publicly available sources such as social media, and other networks where people publicly share and exchange information;
- k) Your previous insurers; and
- l) other insurers or parties involved in the policy or claim.

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 the 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

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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 website, 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 social media companies, such as Meta, may use cookies, web beacons, and other storage technologies to collect or receive information from Our websites and applications and elsewhere on the internet, and use that information to provide measurement services and target advertisements to You.

### Your Cookie Choices

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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 personalised browsing experience.

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

- **Microsoft Edge:**  
<https://support.microsoft.com/en-us/help/4027947/microsoft-edge-delete-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

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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

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

## Unsolicited Personal Information

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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 necessarily 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

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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 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. This includes, for example, disclosure to the Australian Taxation Office for data matching;
- b) where it is necessary for Us to comply with our legal and regulatory obligations. This includes, for example, referring suspected or actual fraudulent activity or financial crime to the police;
- c) where We seek to obtain information relating to Your previous insurance history from other insurers. This includes, for example, for the purpose of assisting Us with Our investigations and to assess risk;
- d) Where we seek to pursue a third party for an insurance loss. This includes, for example, disclosing Your Personal Information (such as your name) to a third party for the purpose of a subrogation claim;
- e) 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 Personal 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);

- f) 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);
- g) for purposes related to: research (including market research), planning, service development, security, testing and risk management;
- h) for the purpose of preventing, identifying and investigating any suspected or actual fraudulent activity or financial crime. This includes, for example, engaging a third party investigator to collect information such as photographs, social media extracts, and statements from other parties etc. on Our behalf; and
- i) for the purpose of conducting business analysis in order to improve or promote 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 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.

We or Our third-party service providers may use artificial intelligence (AI) to assist Us in providing products or services to You. This may involve the use of Your Personal Information.

We may also use AI to help improve our business and provide a better service, for example to assist in underwriting, pricing, claims handling, data analytics, as well as to enhance performance and user experience on Our websites and applications. We use various types of AI, which vary based on Your relationship with Us and the relevant product or service offered. Where appropriate, additional information will be provided to help You understand where AI is being used and how any decisions based on AI are made.

### Direct Marketing

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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 Personal Information for direct marketing purposes without Your consent.

#### Overseas Entities

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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, 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 Australia (such as the Philippines or the 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

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

#### Security

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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, 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 Personal Information stored on Our own servers, We take all reasonable steps 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 comply with the requirements of the APPs in order to protect Your Personal Information against unauthorised disclosure, misuse or loss.

#### Document Destruction

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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 Section 26WE of the Privacy Act, We will notify the Office of the Australian Information Commissioner (**OAIC**) 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 a reasonable and expeditious 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 OAIC and You in writing as soon as practicable. The notification will include:

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

### Exceptions to mandatory reporting

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In accordance with the exceptions provided for under the Privacy 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 OAIC; or
- c) the OAIC 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 You with Our 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 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 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

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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).

### 13. Complaints Process

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If You are not satisfied with our organisation, services, Our response to Your enquiry, or You have any concerns about Our treatment of Your Personal Information or You believe there has been a breach of this Privacy Policy, or You are not satisfied with any aspect of your relationship with Chubb and wish to make a complaint, please contact our Complaints and Customer Resolution Service (**CCR Service**) by post, phone, fax or email (as below):

Complaints and Customer Resolution Service  
Chubb Insurance Australia Limited  
GPO Box 4065  
Sydney NSW 2001  
P +61 2 9335 3200  
F +61 2 9335 3411  
E [complaints.AU@chubb.com](mailto:complaints.AU@chubb.com)

Our Complaints Policy is also outlined in the following brochure [Compliments Complaints and Dispute Resolution](#).

#### Additional Assistance Required to Lodge a Complaint?

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Do you require additional assistance to lodge a complaint, such as nominating a representative who can act for you, or the services of an interpreter if English is not your first language?

We have in place a Policy to assist customers who are experiencing vulnerability or family violence and may require some assistance in lodging a complaint. You can access this Policy by clicking on this link [Vulnerable Customer Policy](#) or contact us for further details.

Alternatively, you may just want to talk to us about the process and what assistance we can provide. Just contact our CCR Service as per the above listed contact details.

#### The Complaints Process

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1. Lodgement: When lodging a complaint, please provide us with Your claim or policy number (if applicable) and as much information as You can about the reason for Your complaint.

2. Acknowledgement: We will acknowledge receipt of Your complaint in most instances within one (1) business day of receiving it from You, or otherwise as soon as practicable. Following acknowledgement and within two (2) business days of acknowledgement, we will advise you of the name and contact details of the Chubb person who will be liaising with You regarding Your complaint.

3. Assessment and Investigation: We will investigate Your complaint and keep You informed of the progress of our investigation at least every ten (10) business days.

4. Response: We will make a decision in relation to your complaint in writing within thirty (30) calendar days. If we are unable to make this decision within this timeframe we will provide you with a reason for the delay and advise of your right to take your complaint to AFCA, subject to its Rules, or to the 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**

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/>

To the extent allowable at law, if you request copies of the information We relied on to make a decision about Your complaint, We must provide it within ten (10) business days of Your request. Please see the General Insurance Code of Practice 2020 by clicking on this link [Code](#) or contact us for further details.

Please note that if We have resolved Your complaint to Your satisfaction by the end of the fifth (5<sup>th</sup>) business day after We have received it, and You have not requested that We provide you a response in writing, We are not required to provide a written response. However this exemption does not apply to complaints regarding a declined claim, the value of a claim or about financial hardship.

## 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:

- cease to receive marketing offers from Us or persons with whom We have an association; or
- 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 query relating to Our treatment of Your Personal Information or Our Privacy Policy.

Contact **The Privacy Officer**

Chubb Insurance Australia Limited

Address GPO Box 4065, Sydney NSW 2001

Email [aulegal.privacy@chubb.com](mailto:aulegal.privacy@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 100 years. Its operation in Australia (Chubb Insurance Australia Limited) provides specialised and customised coverages including Business Package, Marine, Property, Liability, Energy, Professional Indemnity, Directors & Officers, Financial Lines, Utilities as well as Accident & Health, to a broad client base, including many of the country's largest companies. Chubb also serves successful individuals with substantial assets to protect and individuals purchasing travel and personal accident insurance.

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

## Contact Us

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Chubb Insurance Australia Limited  
ABN: 23 001 642 020 AFSL: 239687

Grosvenor Place  
Level 38, 225 George Street  
Sydney NSW 2000  
O +61 2 9335 3200  
[www.chubb.com/au](http://www.chubb.com/au)

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