Chubb Seguros Panama S.A., values having you as one of our clients. That is why we wish to inform you about our Privacy Policy and that we comply with Law 81 of March 26, 2019 on Personal Data Protection and Law 12 of April 27, 2012 that regulates insurance activity in Panama and concordant regulations. Below, we detail our Practices regarding the handling of your personal information while safeguarding and protecting the information you share with us. This Privacy Policy includes examples of the types of personal information we collect and the companies with which we share that information. These examples are illustrative and should not be considered as a complete inventory of our collection, use, and disclosure of information. We also provide you with the opportunity to prevent us from sharing your personal information with companies that are not our affiliates.

Chubb Seguros Panama S.A. strongly believes in maintaining the confidentiality of any personal information we obtain from visitors to our websites. We want you to understand how and why we collect, use, and disclose the personal information you provide to us on our websites.

Definitions

For the purposes of this Protocol of Policies on Use, Processing, Access to Information and Data Protection, the expressions will have the meaning attributed to them below:

- 1. Data storage: Conservation or custody of data in a database of Chubb Seguros Panama S.A. or from third parties that we subcontract for an activity authorized by the User and/or Panamanian regulations.
- 2. Consent: Manifestation of the will granted by the user for Chubb Seguros Panamá S.A. collects, uses, has access to, processes and transfers all or part of the data and information that the User provides, as long as it does so in accordance with the provisions of this Protocol of Policies of Use, Treatment, Access to Information and Data Protection and the concordant regulations of the Republic of Panama.
- 3. Chubb Seguros Panamá S.A.: Refers to the corporation organized in accordance with the laws of the Republic of Panama and registered in the Public Registry on folio No. 608350.
- 4. Personal Data: information concerning natural persons, which identifies them or makes them identifiable.
- 5. Sensitive data: that which refers to the intimate sphere of its owner, or whose improper use may give rise to discrimination or entail a serious risk for him. By way of example, personal data that may reveal aspects such as racial or ethnic origin are considered sensitive; immoral religious, philosophical, or beliefs or convictions; union membership; political opinions; data relating to health, life, sexual preference or orientation, genetic data

or biometric data, among others, subject to regulation and aimed at uniquely identifying a natural person.

- 6. Data Processing: Any operation or technical procedure that allows Chubb Seguros Panama S.A. or the companies of its own economic group, to collect, store, record, organize, elaborate, select, extract, compare, interconnect, associate, dissociate, communicate, assign, exchange, transfer, transmit or cancel the User's data or use them in any other way
- 7. User: Client, insured or person who uses the services of Chubb Seguros Panamá S.A. or who provides their data.

What Information We Collect

We obtain two types of information through our digital channels: Non-Personal Data and Personal Data.

The **Non-Personal** Data collected includes: type of browser used by the visitor, device type, and operating system; digital channel area(s) visited; date and time of access; server provider or Internet Service Provider (ISP); and identity of the site from which it was referred (the site from which the visitor accessed the Online Services); IP address; Media information (e.g., advertising participation in social, digital, and broadcast media); how you use our digital channels and mobile apps, search terms, pages of our mobile apps that you visit, and app performance; the location of the mobile device, as long as the user's device settings have authorized it.

We also obtain **Personal Data** that can identify the visitor, user, or insured, including but not limited to name, address, and other contact information, policy information, claim information (including material submitted as part of the claim), customer service request, information provided for roadside assistance services, or other information you choose to provide to us, but only when you provide it voluntarily. If you apply for a job or enroll in the Career Center, we may obtain personal information about your work and educational history. In addition, certain online services may obtain precise information about the location of the mobile device, but only with your express consent. Once you have consented to obtaining the precise location of the mobile device, you will be able to adjust this consent through the location services preferences management in the mobile device settings.

How We Obtain Personal Data and Non-Personal Information Through Digital Channels

1. You provide it to us: We collect information that you enter in our digital channels and/or in our service offices through applications and other forms or documents such as your name, address, personal identification number or ID, income and beneficiaries.

- 2. Contractual relationship of the insured with Chubb Seguros Panamá S.A. and/or with our affiliates: e.g. their insurance policy, premiums and payment history.
- 3. Information provided by third parties authorized by the user: such as credit bureaus or other providers, insurance brokers, medical personnel.
- 4. Automated Information Collection: We may link automatically collected information with information we already have about you in our databases, in order to identify you as a unique user of Chubb Seguros Panama S.A. This allows us to provide you with a personalized experience regardless of how you interact with us: online, in one of our service offices, via mobile device, etc.

To provide the best possible user experience, we also use automated information collection technologies for reporting and analytics purposes. We examine metrics such as how you shop on our website, in our stores, and on our mobile apps, the performance of our marketing initiatives, and your response to those marketing initiatives.

- 5. Automated Information Collection by Third Parties: We and our service providers use anonymous identifiers, such as cookies and other technologies, to collect and store certain types of information.
- 6. Social Media Widgets: Our sites and mobile applications have social media features such as widgets. These features may collect information about you, such as your IP address and the page you are visiting on our site. They may set a cookie or employ other tracking technologies to do this. Social media features and widgets may be hosted by third parties. Your interactions with those features are governed by the privacy policies of the companies that offer them.
- 7. Mobile Device Location Information: If you use a mobile device, your device may share location information (when you enable location services) with our websites, mobile applications, services, or other service providers.

Servers, storage and transmission of information

Your data is stored for the purposes set out in this document or other documents you enter into with our company and affiliates.

All direct payment gateways adhere to the standards set forth by PCI-DSS as administered by the PCI Security Standards Council, which is a joint effort of brands such as Visa, MasterCard, and American Express.

PCI-DSS requirements help ensure our secure handling of credit card information.

Third-Party Services

In general, the third-party vendors we use will only collect, use, and disclose your information to the extent necessary to enable them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies regarding the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so that you can understand how these providers handle your personal information. In particular, please remember that certain providers may be located or have facilities located in jurisdictions other than you or us. So, if you choose to proceed with a transaction involving the services of a third-party service provider, then your information may be subject to the laws of the jurisdiction(s) in which the service provider or its facilities are located.

Once you leave our website and are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

Information We Share

On occasion, we may share the information described above, as permitted by law, with the following people:

- affiliates dedicated to the sale of property, contingency, accident and health insurance.
- financial service providers, such as general insurance agents and agencies.
- Non-financial companies, such as companies that provide mail-in service for documents.
- marketing companies that provide us with direct marketing and telemarketing services to offer our products.

We will only disclose your personal and sensitive information in the cases and manner provided for by Panamanian data protection law and concordant regulations. Notwithstanding the foregoing, by giving us your personal and/or sensitive data, you agree that we may share them with companies of the same economic group or with our suppliers that we require in order to evaluate, manage, process and provide the services we provide you or carry out any other activity that you authorize us through this document or any other that you sign with us in the future. These companies could be dedicated to marketing services, be our accountants, lawyers, auditors, list of credit history, among others.

How We Use Your Information

We use information obtained through digital channels for a variety of purposes, including:

- to offer, contract, renew and modify products and services;
- process payments, prepare credit documentation requested by the user and evaluate their credit capacity;
- to provide requested information and documents and for other customer servicerelated purposes;
- to process claims;
- enforce our contractual rights;
- to provide information about the services or required notifications, whether physical or digital;
- to send marketing communications or promotional materials that may be of interest and to help us determine relevant advertising;
- administer promotions we may offer, surveys and analysis groups, interest-based advertising, and conduct research and analysis;
- to improve the services provided and the usefulness of digital channels;
- to personalize your experience when using our digital channels;
- to comply with applicable laws;
- to carry out investigations and emails, due diligence processes;
- to prevent and detect fraud, violations and other potential misuse; and
- for any other activity that is authorized by the user in writing.

We or our third-party service providers may use artificial intelligence (AI) to help us provide products or services to you. This may involve the use of your Personal Information. We may also use AI to improve our business and provide a better service, for example, to assist in policy underwriting, pricing, claims management, data analysis, as well as to improve performance and user experience on our websites and apps. We use various types of AI, which vary depending 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 AI-based decisions are being made.

In addition, we may anonymize, combine, or aggregate information obtained through digital channels or otherwise for any of the above purposes or to analyze the use of statistics and trends.

Personal information provided by you will not be sold, licensed, transmitted, or disclosed outside of the Chubb Group unless: (1) you expressly authorize such actions; (2) is necessary for our contractors or agents to provide services to you; (3) is necessary to provide our products or services to you; (4) is disclosed to entities that provide marketing services on our behalf or to entities with whom we enter into joint marketing contracts; (5) in connection with a merger, consolidation, acquisition, divestiture, or other corporate restructuring of all or a portion of our business; or (6) is otherwise required or permitted by law.

Age of consent and veracity of data

By using this site, you declare that you are at least the age of majority in the Republic of Panama and have given us your consent for the use of your personal data. You also declare that the data provided is true and otherwise it will be sufficient reason to deny you any service or terminate them in advance and without any penalty for Chubb Seguros Panama S.A.

Previous Customer Information Policy

Chubb Seguros Panama S.A., may share information about its former customers in the same way as it does with its current customers. Information about past customers is retained for as long as required by local laws and regulations governing the insurance industry.

Security Measures

Chubb Seguros Panama S.A., limits access to your personal information only to those employees who need it to provide you with services and products. We maintain, in addition to the above, the necessary physical and electronic security measures to safeguard the confidentiality of your information, as required by law and our Privacy Policy.

- Internet communications security

The Internet is not a secure medium. We implement administrative, technical, and physical security devices designed to protect personal information. When we enter sensitive information (such as a credit card number) on our websites, we encrypt the information using SSL or similar technology during transmission to our website. Unfortunately, the security of any method of transmitting or storing data cannot be guaranteed, and we assume no liability for any damage or loss caused by the transmission of information by or to Chubb over the Internet. If you believe that the security of an account you have with us has been compromised, please contact us using one of the methods described below.

We restrict access to personal information obtained about you on our websites to our employees, employees of our affiliates, or others who may need that information to provide services or in the ordinary course of business operations.

Sensitive Data

The sensitive data to which Chubb Seguros Panama S.A. access will not be subject to transfer except in the following cases:

- 1. When the user has granted his authorization, except in cases where the granting of such authorization is not required by law;
- 2. When it is necessary to safeguard the life of the user and the user is physically or legally incapacitated. In these cases, the guardians, curators or those who have guardianship of the user must grant authorization to transfer said information.
- 3. When it refers to data that are necessary for the recognition, exercise or defence of a right in a process with competent judicial authorisation.
- 4. For historical, statistical or scientific purposes. In these cases, Chubb Seguros Panama S.A. will proceed to dissociate the user's identity.
- 5. Any other reason of the legal norms allow it.

How do you give us your Consent?

When you provide us with personal, confidential and/or sensitive data, it is because you agree that we may collect and use it for the reasons set forth herein or for which you enter into with Chubb Seguros Panama S.A. For our part, we commit to you to only request the information we require as authorized by the user in this Privacy, Processing, Access to Information and Data Protection Policy and the concordant regulations of the Republic of Panama.

Changes to the Privacy Policy

Chubb Seguros Panama S.A., reserves the right to modify or amend this Privacy Policy.

Any modifications or changes to this Privacy Policy will be effective immediately upon posting. Your continued use of our website after a revised version of this Privacy Policy has been posted will constitute acceptance of the revised Policy.

The information contained in this Privacy Statement from our digital channels should not be used by any person or in any country or jurisdiction where its use would constitute a violation of the law. If this is the case for you, you are not authorized to access or use any information contained on this website. By making use of the digital channels of Chubb Seguros Panamá S.A. or any digital channel of companies in your same economic group (unless the specific website contains anything to the contrary), you agree to be bound by the terms of this Website Privacy Statement and our Terms of

Use. Please periodically review the terms of this Website Privacy Statement, as we reserve the right to modify or amend the Privacy Statement or our Terms of Use at any time.

How We Use "Cookies" and Other Data Collection Tools

Cookies. Chubb may use electronic cookies in your computer or mobile device's browser files when you access Chubb's website. Cookies are data that the Chubb website transfers to your computer or mobile device so that our systems can recognize your browser and customize the information on our websites to your interests. For example, if you previously visited a Chubb website and accessed your account information or inquired about a particular service on the website, cookies allow us to present you with information tailored to your account and/or particular interests the next time you visit the website. In addition, Chubb or a third-party service provider or business partner may use cookies on your computer or mobile device that may be combined with other personal information we hold about you to pre-complete certain online forms for your own convenience. We also use cookies to analyze visitors' use of our websites. Based on this analysis, we have a better understanding of which areas of our sites are most useful and popular so that we can plan improvements and updates. Third parties, including Facebook, may use cookies, web beacons, and other storage technology to obtain or receive information from Chubb websites and applications and elsewhere on the Internet, and use this information to provide market research services and identify advertisements to you.

Why are cookies important for the use of Chubb's websites?

We use cookies to improve the functionality of the website and to identify information about how the site is used in order to permanently improve and personalize it based on the user's preferences. Especially:

- Cookies enable us to use the websites individually personally. Some functions of our websites cannot be used without cookies, such as registration or changing settings. Cookies must be enabled for optimal use of the website.
- 2. We cannot track the number of visitors to our website without cookies. Without this information, the risks related to security and fraud on the website increase, which we want to avoid.
- 3. Cookies allow us to verify how users access and navigate the site. This is very important to improve the website and make it more user-friendly. It is important to note that cookies can only read the identification number created by your computer's generator at random, and can only retrieve information that is directly related to the Chubb website.

Types of cookies

Cookies can be "persistent" or "session". This website uses both persistent and session cookies.

A persistent cookie consists of a text file sent by a server to a browser, which allows us to obtain and analyze (anonymously) information about website traffic and usage, monitor the system and improve operational performance, such as saving preferences to improve subsequent visits. It is not automatically deleted when the browser is closed, but is saved and will remain valid until the set expiration date (unless deleted by the user before the expiration date).

A session cookie is essential to ensure the proper functioning of the website and is used to manage registration/login and access to reserved functions. It is temporarily saved during a browsing session and expires at the end of the user's session when the browser is closed.

It is also important to consider that some cookies (which are generally session cookies) are what we call strictly necessary. Strictly necessary cookies allow you to navigate the website and use functions that have been explicitly requested. Other types of cookies can be disabled and strictly necessary ones can be enabled - see "Your Cookie Choices" below.

Clear GIFs, pixel tags, and other technologies. In addition to cookies, we may also use other means to passively collect non-personally identifiable data about the use of our websites, such as "clear GIFs" (small files of information that can be embedded in images on the website and allow us to track the use of our websites) and to analyze "clickstream" data (the virtual path left behind when browsing the Internet and viewing our websites). We use clear GIFs and clickstream data to obtain information about the visit to our websites and in connection with emails to track the response rate. The data may include information about the device, such as IP address, but does not identify the user by name. Blocking cookies prevents clear GIFs from tracking activity, and also prevents us from obtaining certain information, such as IP address, but we can still keep a record of the visit. In addition to information obtained from cookies, clear GIFs, through clickstream data analysis, and other means we may use to obtain non-personally identifiable information about you and your visits to our web pages, we may also obtain anonymous information that you provide to us online, for example, by using our tools and calculators.

Your Cookie Choices

You can enable and disable cookies by adjusting your browser settings. In this way you can refuse the use of cookies (except for strictly necessary cookies). You can also delete cookies that have already been placed on your device.

It is important to remember that if some or all cookies are disabled or deleted, the correct functioning of some network services (including on this website) may be affected, and the browsing experience may not be free of problems and more personalized.

Go to the "Help" section of your browser to learn how to adjust your cookie settings, or follow the links below:

Internet Explorer:

https://support.microsoft.com/gp/cookies/en

Mozilla Firefox:

https://support.mozilla.com/en-US/kb/Cookies

Google Chrome:

https://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647

Safari:

https://support.apple.com/kb/PH5042

Opera:

https://www.opera.com/browser/tutorials/security/privacy/

For more information on cookies and more detailed advice on how to disable and enable them, please go to https://www.allaboutcookies.org/es/

Do not track. We and our third-party service providers or servers may also use cookies or similar technologies to obtain information about browsing activities over time and across different websites following your use of the Online Services. Although you have the ability to control the use of cookies through your browser as we specify above, we do not currently respond to do not track signals or other mechanisms that serve as a method to prevent the collection of information from the networks of websites and online services in which we participate. For more information on the "Do Not Track" feature, please go to www.allaboutdnt.com.

Third-party analytics tools. We use automated devices and applications, such as Google Analytics, to evaluate the use of our Online Services. We also use other analytics tools to evaluate our Online Services. We use these tools to improve our services, performance, and user experiences. These entities may use cookies and other tracking technologies to provide their services. We do not share your name or contact information with these analytics service providers, although they may obtain unique device identifiers or IP addresses.

Third-Party Advertising Networks. We use third parties such as digital advertising providers to place ads on third-party websites or other media (e.g., social media platforms). This

allows us and third parties to identify advertisements for products and services that may be of interest to you. Digital advertising providers, advertisers, sponsors, and/or traffic measurement tools use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs, and other tracking technologies to measure the effectiveness of their advertisements and to personalize advertising content. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this policy. We may provide these advertising third parties with information about you.

Right of Access, Rectification, Cancellation and Opposition

If you wish your personal information to continue to be shared with unaffiliated companies, you do not have to return this document. We appreciate your trust in all of our insurance products and services.

If you would like to know what personal data we hold about you, the origin and purpose for which it was collected, please complete the Request below with the subject "Access".

If you wish to delete the data we hold about you because it is incorrect, erroneous, or outdated, please complete the Request below with the subject line "Cancellation."

If you wish to correct the data we hold about you as incorrect, erroneous or outdated, please complete the Request below with the subject line "Rectification".

If you do not want your personal information shared, such as between non-affiliated companies, please complete the Request below with the subject line "Objection."

Address:

Chubb Seguros Panama S.A.

take 10 business days to take effect.

Business Park, Tower V, 14th FloorAve. La Rotonda, PanamaMailing Address:

Consent

By using the Online Services, you consent to this Online Privacy Policy and the site's Terms of Use. If you do not agree with this policy or the site's Terms of Use, please do not use the Online Services. The Online Services may not be used within any country or jurisdiction or by any person where such use would constitute a violation of law. If this applies to you, you are not authorized to access or use any of the Online Services.