

CHUBB®

Chubb Insurance New Zealand Limited

Privacy Policy (Policy)



1. Definitions in this Policy

In this Policy “We”, “Our” and “Us” means Chubb Insurance New Zealand Limited (Chubb), its authorised representatives, related companies, and third parties who provide services to Us or on Our behalf.

“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 New Zealand, such as Australia or the regional head offices of Chubb located in Singapore, UK or USA.

What is Personal Information?

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

What are Unique Identifiers?

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

2. Our Commitment

We value Our partners and Our customers’ trust in Us and We are committed to maintaining the confidentiality and privacy of Your Personal Information. This Policy details how We collect, disclose and handle Your Personal Information in accordance with the requirements of the Privacy Act 1993 and the Information Privacy Principles (IPPs).

To read a snapshot of this Policy, please refer to Our Privacy Statement which is available within Our product documents and application forms and on Our website <https://www2.chubb.com/nz-en/footer/privacy.aspx> or contact Us.

3. Your Consent

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 insurance or to respond to any claim.

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://www2.chubb.com/nz-en/footer/privacy.aspx>.

5. Why We collect Your Personal Information?

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

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

6. The types of personal Information that We collect

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

- a) contact information such as Your name, address details, and contact numbers;
- 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;
- 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 and questionnaires; and
- g) any relevant payment or billing information, such as bank account details, direct debit and credit card details or premium funding and insurance payment arrangements.

Unique Identifiers

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

7. How We collect Your Personal Information

Directly

We collect Your Personal Information from You in various ways and at various points of interaction with Us. We will collect Your Personal Information on Our website or partner websites, by telephone, facsimile, email when You complete an application form for one of Our products or services and forward it to Us, enter a competition or voluntarily participate in a survey.

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

Indirectly

In so far as they relate to Our services and activities, We may collect Personal Information about You indirectly from:

- 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 or anyone else You have authorised to deal with Us on Your behalf;
- d) insurance intermediaries including Our distributors, brokers, referrers including clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- e) medical providers and health care workers;
- f) Financial Services Complaints Limited or other external dispute resolution body;
- g) witnesses in relation to claims;
- h) premium funders;
- i) Your previous insurers;
- j) publically available sources such as social media, and other networks where people publically share and exchange information; and
- k) Chubb Group of Companies and any other person who We enter into a business alliance with.

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:

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- 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 or the NAI's website at www.networkadvertising.org.

Third party Platforms

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

8. Sharing, disclosing and using Your Personal Information

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

- a) if disclosure is required by the law;
- b) where You have authorised the use or disclosure (this will include situations where your actions demonstrate your authorisation to share Your information with that third party, for example where access to Our products has been facilitated through a third party e.g. insurance broker, online marketing agency, airline, travel agent, referring agent, authorised representative, distributor, mortgage

broker, sporting association, member club or association, credit facility/provider). Circumstances where this may occur are:

- where it is necessary for a third party to assist Us in providing Our services or professional advice to Us, for example, a mailing house, reinsurers, insurance intermediaries, insurance reference bureau, lawyers, accountants, loss adjusters and others involved in the claims handling process;
- information given to the policy holders, where you are an insured person, but not the policy holder;
- for purposes related to: research (including market research), planning, service development, security, testing and risk management;
- if disclosure is required for the purpose of conducting business analysis in order to improve Our products and services.

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 a 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 seek to use the Personal Information we collect from You for direct marketing and ask Your consent for this.

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

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

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

Storage

We hold Personal Information within Our own data storage devices or with a third party provider of data storage including those 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 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 Our own servers, We take all reasonable steps to manage data stored on Our servers to ensure data security.

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.

11. 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.

12. Access to and correction of Your Personal Information

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

When You seek to access or correct any Personal Information We hold about You, You should contact 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 access or to give access in a manner requested by You, We will provide written reasons together with guidance on how You can make a complaint about the refusal.

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

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

Cost of access and corrections

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

13. Privacy complaints process

If You are not satisfied with Our response to Your enquiry or complaint or where You have any concerns about Our treatment of Your Personal Information or where You believe there has been a breach of this Privacy

Policy, You should contact Our Privacy Officer clearly setting out the nature of Your concern. The contact details are at the end of this Policy.

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

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

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

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

Further review of any privacy complaint

If You remain dissatisfied with Our review, You may take the complaint to the Privacy Commissioner. The Privacy Commissioner has the power to investigate complaints and recommend appropriate action to remedy privacy complaints. The contact details for these bodies are as follows:

Privacy Commissioner, New Zealand

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

14. Contact Us

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

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

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