

# Personal Data Protection Policy



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# Chubb's Personal Data Protection Policy

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Chubb Insurance Singapore Limited (“**Chubb**”) is committed to the protection of your personal data. Chubb collects, uses, discloses and retains your personal data in accordance with the Personal Data Protection Act 2012 (“**PDPA**”) and our own policies and procedures.

The purpose of this Data Protection Policy (“**Policy**”) is to regulate how Chubb collects, uses, discloses and retains personal data. We developed this Policy as part of our on-going commitment to the protection of your personal data.

For a summary of our privacy commitment to you, including the type of personal data we collect; how we collect it; how to access, correct or update your personal data; or what to do if you have a complaint about the treatment of your personal data, please refer to our [privacy statement](#) available on our website at [www.chubb.com/sg](http://www.chubb.com/sg) or by contacting us.

## 1. Objectives

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The objectives of this Policy are to:

- 1.1. provide a set of privacy and personal data protection standards that govern our procedures and protect the privacy of your personal data;
- 1.2. demonstrate our on-going commitment to protecting your privacy and addressing any privacy concerns that you might have;
- 1.3. describe the ways in which we collect, use, disclose and retain your data;
- 1.4. ensure that we comply with the PDPA; and
- 1.5. facilitate our compliance with any further developments in the protection of personal data.

## 2. Personal Data Protection Act 2012 (“PDPA”)

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Below, we provide guidance as to how we collect, use, disclose and retain your personal data in accordance with the PDPA and how we administer this Policy.

## 3. Consent Obligation

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### 3.1. Consent Required

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3.1.1. Chubb shall not collect, use or disclose your personal data unless:

- (a) you give, or are deemed to give, consent to the collection, use or disclosure of your personal data;  
or
- (b) the collection, use or disclosure of your personal data without your consent is required or authorised under the PDPA or written law.

### 3.2. Provision of Consent

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- 3.2.1. Chubb shall not, as a condition of providing a product or service to you, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide the product or service to you.
- 3.2.2. Chubb shall not obtain or attempt to obtain your consent for collecting, using or disclosing personal data by providing false or misleading information with respect to the collection, use or disclosure of your personal data, or use deceptive or misleading practices.

### 3.3. Deemed Consent

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- 3.3.1. You are deemed to consent to the collection, use or disclosure of your personal data for a purpose if:
  - (a) you voluntarily provide your personal information to Chubb for that purpose, albeit without actually expressly providing your consent; and
  - (b) it is reasonable that you would voluntarily provide the data.

### 3.4. Withdrawal of Consent

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- 3.4.1. On providing reasonable notice to Chubb, you may at any time withdraw any consent given, or deemed to be given, in respect of Chubb's collection, use or disclosure of your personal data for any purpose.
- 3.4.2. You may submit the withdrawal of consent via mail, email, or by completing the [Withdrawal of Consent Form](#) and submit to Chubb DPO.
- 3.4.3. On receipt of such notice, Chubb shall inform you of the likely consequences of withdrawing your consent.
- 3.4.4. Please allow up to 30 days for Chubb to process and update your request. You may continue to receive marketing messages and other product information from Chubb within these 30 days.
- 3.4.5. Chubb shall not prohibit you from withdrawing your consent to the collection, use or disclosure of your personal data.
- 3.4.6. If you withdraw your consent, then Chubb shall cease (and cause its data intermediaries and agents to cease) collecting, using or disclosing your personal data unless otherwise required under the PDPA or other written law.
- 3.4.7. Although you may have withdrawn consent for the collection, use or disclosure of your personal data, Chubb may retain your personal data for purpose of administering your policy with Chubb and in accordance with Chubb Records and Retention Policy.

## 4. Purpose Limitation Obligation

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### 4.1. Limitation of Purpose

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4.1.1. Chubb shall collect, use or disclose your personal data only for purposes:

- (a) that a reasonable person would consider appropriate in the circumstances; and
- (b) where you have been informed in accordance to clause 3.2 of this Policy, to the extent applicable.

### 4.2. Notification of Purpose

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4.2.1. Chubb shall provide you with the following information whenever we seek to obtain your consent to the collection, use or disclosure of your personal data, except under circumstances where your consent is deemed or is not required:

- (a) the purpose(s) for the collection, use or disclosure of your personal data, on or before collecting your personal data;
- (b) any other purpose(s) for the use of your personal data of which you have not been informed under clause 3.2.1 of this Policy, before the use or disclosure of your personal data for that purpose; and
- (c) on request by you, the contact details of the Chubb Data Protection Officer (“**DPO**”) who can answer your questions about collection, use or disclosure of your personal data.

## 5. Access and Correction Obligation

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### 5.1. Access to Your Personal Data

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5.1.1. On your request, and subject to the restrictions set forth in the PDPA, Chubb shall, as soon as reasonably possible, provide you with:

- (a) your personal data that is in Chubb’s possession or control; and
- (b) information about the ways in which your personal data has or may have been used or disclosed by Chubb within a year before the request.

5.1.2. Chubb may charge you a minimum fee for access to your personal data to offset the administrative costs in complying with such requests.

### 5.2. Correction of Your Personal Data

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5.2.1. You may request Chubb to correct an error or omission in your personal data that is under Chubb’s control or possession. Unless Chubb is satisfied on a reasonable grounds that a correction should not be made or the law states otherwise, Chubb shall:

- (a) correct your personal data as soon as practicable; and
- (b) send your corrected personal data to every organisation to which your personal data was disclosed by Chubb within a year before the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

5.2.2. Chubb is not required to correct or alter an opinion, including professional or an expert opinion.

## 6. Accuracy Obligation

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Chubb shall make reasonable efforts to accurately record your personal data as given by you or your representatives and make reasonable efforts to ensure that your personal data is accurate and complete, if the personal data:

- 6.1. is likely to be used by Chubb to make a decision that affects you; or
- 6.2. is likely to be disclosed by Chubb to another organisation.

## 7. Protection Obligation

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Chubb shall protect personal data in its possession or control by making reasonable security managements to prevent unauthorised access, collection, use, disclosing, copying, modification, disposal or any other similar risks.

## 8. Retention Limitation

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Chubb shall cease to retain documents containing your personal data, or remove the means by which your personal data can be associated with you, as soon as it is reasonable to assume that:

- 8.1. the purpose for which your personal data was collected is no longer being served by retention of your personal data; and
- 8.2. retention is no longer necessary for legal or business purpose.

## 9. Transfer Limitation Obligation

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Chubb shall not transfer your personal data outside of Singapore except in accordance with the requirements of the PDPA.

## 10. Do Not Call Provisions

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- 10.1. Chubb shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number without first checking with the Do Not Call Registry established by the Personal Data Protection Commission (“**PDPC**”) and receiving confirmation from the PDPC that such Singapore telephone number is not listed on the Do Not Call Registers.
- 10.2. Chubb shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number, unless the specified message includes clear and accurate information identifying the person sending the specified message and/or Chubb, and such person’s and/or Chubb’s contact information.
- 10.3. The prescribed duration within which Chubb must check with the Do Not Call Registry before sending a specified message to a Singapore telephone number will be:
  - (a) 60 days, for messages sent before 1 August 2014; and
  - (b) 30 days, for messages send after 1 August 2015.

You may continue to receive marketing messages and other product information from Chubb within the prescribed validity period.

- 10.4. Chubb shall not make, cause or authorise a voice call addressed to Singapore telephone number that conceals or withholds, or that has the effect of concealing or withholding, the calling line from the recipient.

- 10.5. Chubb shall not require a subscriber or user of a Singapore telephone number to consent to the sending of a specified message beyond what is reasonable for Chubb to provide its goods and services. Chubb shall not obtain or attempt to obtain such consent by:
  - (a) providing false or misleading information; and
  - (b) using deceptive or misleading practices.
- 10.6. If a subscriber or user of a Singapore telephone number gives notice withdrawing consent for the sending of a specified message to that number, then Chubb shall cease (and cause its agents to cease) sending specified messages to that number.

## 11. Complaint Handling Procedure

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- 11.1. Should you be unhappy with our treatment of your personal data or you believe there has been a breach of this Policy, please contact Chubb's Data Protection Officer (details in clause 14 below) and clearly set out the nature of your concern.
- 11.2. Complaints may be initially made orally, or in writing. Where a complaint is made orally, you must confirm the complaint in writing as soon as possible. If you require assistance in lodging your complaint, please contact us.
- 11.3. Your complaint will be reviewed and you will be provided with a written response within fourteen (14) working days.

## 12. Compliance with This Policy

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- 12.1. Chubb implements this Policy through the use of proper procedures and staff training to ensure compliance with this Policy.
- 12.2. We ensure that our employees and any representatives who deal with personal data are aware of the standards of this Policy.
- 12.3. Chubb requires that all of its employees and representatives with access to personal data maintain confidentiality concerning that personal data. We implement that requirement through appropriate contractual terms and internal policies.
- 12.4. Our procedures for handling personal data are developed to implement the standards of this Policy. Chubb trains its employees in the proper conduct of those procedures that are relevant to their duties.

## 13. Review of Chubb's Data Protection Policy

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Chubb ensures that this Policy remains current and continues to fulfil its objectives. This is achieved through periodical reviews, having regards to:

- 13.1. the need to actively consider privacy and data protection issues as new products and services are developed or offered;
- 13.2. any guidance issued in relation to PDPA; and
- 13.3. any changes to PDPA.

## 14. Data Protection Officer (“DPO”)

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For further information about this Policy or to access our complaint handling procedures, please address your correspondence to:

Address: Chubb Data Protection Officer  
138 Market Street  
#11-01 CapitaGreen  
Singapore 048946

E [dpo.sg@chubb.com](mailto:dpo.sg@chubb.com)

## About Chubb in Singapore

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Chubb is the world’s largest publicly traded property and casualty insurer. Chubb Insurance Singapore Limited, via acquisitions by its predecessor companies, has been present in Singapore since 1948. Chubb in Singapore provides risk management and underwriting expertise for all major classes of general insurance, including Property & Casualty, Marine, Liability, Financial Lines and Group Personal Accident insurance. As one of the leading providers of Accident & Health insurance through direct marketing, the company partners with financial institutions and other companies to tailor individual policies for their clients and employees. In addition, it offers a suite of customised Personal & Specialty insurance solutions to meet the needs of consumers.

Over the years, Chubb in Singapore has established strong client relationships by offering responsive service, developing innovative products and providing market leadership built on financial strength.

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

## Contact Us

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