

# Data Protection Policy



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## Data Protection Policy

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Chubb Insurance Singapore Limited (“**Chubb**” or, as appropriate in the context, “**we**”, “**us**” or “**our**”) is committed to the protection of your personal data. We respect your privacy and want you to understand how Chubb handle personal information about you in connection with the services Chubb provides.

This Data Protection Policy (“**Policy**”) sets out the basis which Chubb may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

For a copy 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 [Personal Data Protection Statement](#) available on our website at [www.chubb.com/sg](http://www.chubb.com/sg) or by contacting us.

## What is Personal Data

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“**Personal Data**” means data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which we have or are likely to have access.

Personal data collected by Chubb will vary depending on the circumstances of collection, the nature of the relationship and the relevant services provided. The types of personal data that we collect includes but is not limited to:

- a. Your contact details, such as, name, postal address, email address, and telephone number;
- b. Your gender, date of birth, place of birth, marital status, dependents, nationality, country of residence, occupation, and other demographic information;
- c. Your identification information, such as NRIC number, passport number, birth certificate number, foreign identification number or work permit numbers;
- d. Your financial information, such as, bank account number, credit or debit card information, including the name of cardholder, card number, billing address and expiry date;
- e. Your travel information, such as, travel destinations, flight information; and
- f. Information about your health, such as medical records, description of illness or injury suffered.

## How We Collect, Use and Disclose Your Personal Data

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1. We generally do not collect your personal data unless:
  - a. it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes; or
  - b. collection and use of personal data for a purpose is permitted or required by the PDPA or other laws.
2. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

3. We collect personal data, either directly from you, from third parties, or from publicly available sources. The personal data which we collect from you may be collected, used or disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data. You can view the full details of the purposes of collection, use and disclosure of your personal data (collectively, the “**Purposes**”) in the Purpose Statement.
4. Personal data may be collected through Chubb websites or mobile applications. The personal data collected are governed by the Online Privacy Policy available on our website at [www.chubb.com/sg](http://www.chubb.com/sg).
5. We may disclose your personal data:
  - a. where such disclosure is required for performing obligations in the course of or in connection with our provision of products and services requested by you; or
  - b. to third party service providers, business partner, other companies within the Chubb Group, other insurers, our reinsurers and government agencies (where we are required by law) for and in connection with the purposes described in the Purpose Statement.
6. The purposes listed in the Purpose Statement may continue to apply even in situation where your relationship with Chubb has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

## Withdrawing Your Consent

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7. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw your consent to Chubb using and/or disclosing your personal data for any or all of the purposes listed in the Purpose Statement by submitting your request in writing or via email; or by completing the Withdrawal of Consent Form to our Data Protection Officer at the contact details provided in clause 24.
8. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) days of receiving it. You may continue to receive marketing messages and other product information from Chubb within these 30 days.
9. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our products or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 7 above.
10. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

## Access and Correct Your Personal Data

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11. You may request to access and/or correct your personal data currently in our possession by submitting your request in writing or via email to our Data Protection Officer at the contact details provided in clause 24.
12. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request **within thirty (30) days** after receiving your request, will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any

personal data or to make a correction requested by you, we shall generally inform you of the reason(s) why we are unable to do so (except where we are required to do so under the PDPA).

13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

## How We Protect Your Personal Data

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14. We strives to protect your personal data in our possession, custody or control, by maintaining appropriate administrative, technical and physical safeguards to protect against unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.
15. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Please refer to the Security of Internet Communications in our [Online Privacy Policy](#) available on our website at [www.chubb.com/sg](http://www.chubb.com/sg).

## Accuracy of Your Personal Data

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16. We shall make reasonable efforts to accurately record your personal data as given by you or your authorised representatives. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided in clause 24.

## Retention of Your Personal Data

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17. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
18. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

## Transfer of Your Personal Data Outside of Singapore

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19. We may need to transfer your personal data across international borders to our affiliate based in the shared services unit in Philippines (who provides processing, customer service and operational support to Chubb).
20. Where we share your personal data with other companies within the Chubb Group or any other third party located outside of Singapore, your personal data will be shared only in the extent it is necessary to allow such overseas recipients to perform their relevant tasks.
21. Whenever we transfer your personal data to countries outside of Singapore, we will take all appropriate steps that are within our control to take so as to ensure your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

## Complaints

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22. You may send complaints or feedback regarding our handling of your personal data in the following manners:
- in writing or via email to our Data Protection Officer at the contact details provided in clause 24; or
  - contact our Customer Service Representatives at +65 6299 0988 (Mondays to Fridays, 9.00am to 5.00pm, excluding Public Holidays).
23. All complaints will be evaluated by Chubb in a timely manner. After Chubb has completed its evaluation, either the Data Protection Officer or the Customer Service Representative will respond to the person who submitted the complaint or feedback, with the results of the evaluation.

## How to Contact Us

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24. If you, at any time, have any queries on this Policy, or any other queries in relation to how we may manage, protect and/or process your personal data, please contact our Data Protection Officer at:

Data Protection Officer  
Chubb Insurance Singapore Limited  
138 Market Street  
#11-01, CapitaGreen  
Singapore 048946

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

## Changes to this Policy

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25. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
26. As part of our efforts to ensure that our policies, procedures and processes remain current and continues to fulfill its obligations under the PDPA, we may change this Policy at any time and from time to time, without any prior notice. Your continued use of any of our services following the posting of an updated version of this Policy will constitute your acknowledgement and acceptance of such changes.

Effective date: **01 June 2019**