

Chubb Life Insurance
New Zealand Limited
Privacy Statement

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Chubb Life Insurance New Zealand Limited

Privacy Statement

Chubb Life Insurance New Zealand Limited (**Chubb Life, we, us, our**) recognises the importance of protecting your privacy.

1. Introduction

1.1 Overview

This Privacy Statement explains how Chubb Life may collect, hold, use and disclose information that identifies you (your **personal information**).

If you would like to contact us in relation to this Privacy Statement or our use of your information, please contact us at the details set out in the Contact Us section below.

1.2 Application of this Privacy Statement

Please read this Privacy Statement carefully. It applies to any personal information that you provide to Chubb Life or authorise us to collect. You authorise Chubb Life to collect, use, hold and disclose your personal information in accordance with this Privacy Statement if you:

- (a) provide Chubb Life (including through independent advisers and other distributors) with, or authorise us to collect, personal information
- (b) use our website, mobile applications (**Apps**) or other services, including our website available at: <https://www.chubblife.co.nz> (**Website**).

If you are an independent adviser authorised to distribute Chubb Life products (**Chubb Life Adviser**), you also authorise Chubb Life to collect, use, hold and disclose your personal information in accordance with this Privacy Statement when you engage with us and provide services to us as an adviser or use our adviser website available at <https://adviser.chubblife.co.nz> (**Adviser Hub**) and any other resources we make available to you.

We have recently updated and renamed our Privacy Policy with this Privacy Statement. If any application form or other document or communication issued by us refers to our "Privacy Policy" it should be construed as a reference to this Privacy Statement.

1.3 Updates to this Privacy Statement

We may update this Privacy Statement at any time by posting an updated version of it on our Website. The updated version of this Privacy Statement will take effect immediately once it is live on our Website.

We may also take additional steps to bring the changes to your attention, including by notifying you directly. You are responsible for reviewing this Privacy Statement regularly to ensure that you are aware of any updates.

We will update you of any material changes as required by law.

1.4 Additional rights and obligations

This Privacy Statement applies in addition to, and does not limit, our rights and obligations under the Privacy Act 2020 (as amended or replaced from time to time) (**Privacy Act**) or any specific authorisation that you provide to us when you interact with us or use our services.

You are not required to provide us with any personal information that we request. However, if you do not do so, we may not be able to provide certain services to you. For example, we may not be able to consider your application for insurance cover, administer your policy or manage a claim under your policy.

1.5 Important Notice: New Zealand residents

Our Website and services are intended for New Zealand residents only. If you are located in another country you may be subject to other laws, including data protection laws. For that reason, if you are not located in New Zealand you are not permitted to use, and must immediately cease using, our Website and services.

2. Collection of personal information

2.1 Types of personal information we collect

The personal information we collect will vary depending on the services that you use, and your interactions with us.

For example, if you are a customer (or interested in becoming a customer) we may collect:

- your name, address (or location or city of residence), telephone numbers, and e-mail address
- identifying information, such as your date of birth, driver's licence, passport, or birth certificate
- your gender and marital status, number of dependants and family and beneficiary information
- information relating to your relationship with Chubb Life, such as your membership details and details of claims you have made
- other information and feedback that you provide when you engage with us, such as when you subscribe to a Chubb Life newsletter, when you participate in Chubb Life's surveys or promotions, and when you contact us (over the phone, through email, social media, letter or our digital interactive options), or when you visit our Website or use our Apps
- recordings of telephone calls between you and our representatives and call centres;
- publicly available information from your social media profiles
- financial information, such as your income, bank account details, direct debit and credit card details, payment arrangements, superannuation and tax
- lifestyle, health and medical history and insurance claims information
- information about other insurance you hold or benefits you may receive, including from ACC and other governmental agencies.

If you are a Chubb Life Adviser, we may collect information relevant to your role as an insurance adviser.

2.2 How we collect personal information

Generally we collect personal information directly from you when you contact us or request or use our products or services. For example when you:

- send us an email or complete our application or claims forms
- speak with our advisers or representatives - we generally record inbound and outbound telephone calls for operational purposes such as complaint handling and reporting, quality assurance and staff training
- live chat or screen share with our team
- use our Website (see further detail below).

Our Website includes social media features, such as the Facebook Like button. These features may collect your IP address, which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing the relevant feature.

We have implemented and use Google Display Advertising. The Google Analytics feature we have implemented based on Google Display Advertising is re-marketing. This means that if you visit our Website but do not make a purchase, and you later visit a Website which has advertising space that is part of the Google Display Network, then you may see an advertisement from us on the second website. You can opt-out of Google Analytics for Display Advertising and customise Google Display Network ads using the Ads Preferences Manager.

2.3 Information we collect from others

We also collect your personal information from other people, with your consent. You provide your consent when you make an enquiry about our products or services or complete our application or claim forms. This may include:

- agents, insurance advisers and brokers
- other entities within the same group of companies as us at any time (**Chubb Group**)
- service providers
- medical professionals
- other insurers
- banks and other financial institutions
- credit reporters (see further detail below)
- fraud prevention agencies
- employers (current or former).

We may also collect information about you that is publicly available or where you have provided third parties with your consent to share information about you with us, for example, from public registers or social media.

2.4 Information about other people

If you provide us with, or authorise us to collect, personal information about another person, you confirm that they have authorised you to provide us, or authorised us to collect, their personal information in accordance with this Privacy Statement and that you have informed them of their rights to access and request correction of their personal information, as set out below.

2.5 Cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. We use cookies to make our Website and Adviser Hub as convenient as possible. Cookies don't personally identify you, but they do identify your browser. Cookies are useful to estimate the number of customers and determine overall traffic patterns through our Websites. If you don't want to receive any cookies, just set your browser to refuse cookies. This may mean you won't be able to take full advantage of our Websites.

3. Use of personal information

We may use your personal information for the following purposes:

- providing quotes or product information
- processing, evaluating and administering applications
- establishing your identity and the identity of others specified on a policy
- managing insurance policies, including changes to your insurance policies
- processing insurance claims, including investigating and assessing claims and assessing if you have met your duty of disclosure at application time
- processing payments
- assessing and responding to requests and complaints and any other instructions
- providing information and documentation to other parties associated with any application or policy
- our general business purposes, including administering and managing our products and services, ensuring that the products you have and services you receive are meeting your needs and managing our relationship and communicating with you
- undertaking surveys about and development of our products and services
- improving user experience (including on our Website, Adviser Hub, Apps and Software) and the training of our staff and Chubb Life Advisers
- following up about a lapse or cancellation of your policy or any other engagement with us (such as a request for a quote or application)
- providing information to advisers, brokers, agents or other intermediaries who introduced you to us or who have an interest in your continued relationship with us
- complying with regulations, industry codes and legal and ethical obligations, such as sanctions checking or anti-money laundering and countering financing of terrorism laws
- marketing purposes (see further details below)
- any other purposes authorised by you or permitted by law.

Marketing

We may use your personal information to provide you information about Chubb Life and third party products or services that we believe may be relevant and of interest to you, including via email and other electronic means. However, we will not do so if you tell us not to.

You may opt out of receiving marketing communications at any time if you no longer wish to receive marketing information or do not wish to receive marketing information in a particular way (for example, by email). To do so, please contact us using the details provided below. Alternatively, you may unsubscribe from our email marketing messages.

We also use aggregated and anonymous information (where identifiable characteristics are removed, so that you will remain anonymous) for statistical and actuarial research undertaken by the Chubb Group, the financial services industry or our regulators.

Chubb Life Adviser

If you are a Chubb Life Adviser, we also collect and use your personal information for the purposes of managing our relationship with you. This may include collecting and using your personal information for the purpose of data matching. 'Data matching' is the process of comparing your personal information with publicly available information and/or with information held by a reputable entity that we have an ongoing relationship with in order to better enable us to carry out any of the above purposes and administer our products and services.

Chubb Life may disclose your information to carefully selected third parties for the purposes of data matching or for specific marketing purposes, provided those third parties are subject to an obligation of confidentiality.

If you are a Chubb Life Adviser, we may disclose and collect information about you (including default information) to and from a credit reporting and debt collection agencies, who may retain that information and use it to provide their credit reporting services.

4. Disclosure of personal information

We may share your personal information with third parties for the purposes outlined above. This may include:

- the Chubb Group
- Chubb Life Advisers
- service providers
- public sector agencies
- claims assessors and claims reference providers
- reinsurers and other insurance companies
- hospitals and medical and health professionals
- legal and other professional advisers
- employers (past and present)
- agents, advisers, brokers and other distribution intermediaries
- other policy owners, insured persons and policy beneficiaries.
- any other party authorised by you or to whom we are required or authorised to disclose personal information in accordance with applicable law.

If we disclose your personal information outside New Zealand, we will ensure that we do so in accordance with the Privacy Act.

5. Storage of personal information

5.1 Storage

Personal information that we collect is either held by us at our head office (refer to the Contact Us section below) or on our behalf. For example, some information we hold will be stored in "the cloud" in secure databases on our behalf by related or third parties based either in New Zealand or overseas (see further details below).

5.2 Security

Security of your information is very important to us. We will take reasonable steps to protect the security of the personal information we hold about you from misuse, loss or unauthorised access, use, modification or disclosure.

We have information security policies and procedures in place for both computer records and for our paper files. These include password protection for accessing our electronic IT systems, storing paper files in secure cabinets or facilities and physical access restrictions.

Personal information that we hold electronically is stored on secure servers that are protected in controlled facilities.

We require our employees and data processors to respect the confidentiality of any personal information held by us.

When you provide personal information online, it is encrypted. This means it cannot be read as it is transmitted over the internet between your browser and our server. The encrypted data is transmitted using a RSA 2048 bit secure socket layer (SSL) connection.

Unfortunately, no data transmission over the internet can be completely secure, so we cannot give an absolute assurance that the information you provide to us via the internet will be secure at all times. We will not be held responsible for events arising from unauthorised access to your personal information.

Please [contact us](#) if you want further information about our security practices. Please notify us immediately if you become aware of any unauthorised use of this Website or any other breach of security.

6. Artificial intelligence

We and/or our third party service providers may use artificial intelligence (AI) to provide products or services to you, which may involve the use of your Personal Information. We may use AI in connection with our products or services to facilitate and service our business (eg assist in underwriting, pricing, claims handling process or data management), as well as to enhance performance and user experience on our websites and applications. The type of AI we use varies based on your relationship with us and by product and service.

7. Access and correction of personal information

Under the Privacy Act, you have the right to access and request correction of any personal information that we hold about you. We can withhold some or all of any information you request in some limited circumstances. If we withhold information from you, we'll give you reasons. If you are not happy with the reasons we give, you can make a complaint through our internal dispute resolution process. Please refer to the 'Contact Us' section below. You may also make a complaint to the Privacy Commissioner.

We take reasonable steps to ensure that any personal information we hold about you is accurate and up-to-date, however we rely on you to notify us of any changes to the personal information we hold about you.

8. Other websites

Our Websites may provide links to other websites for your convenience and information. These websites are outside our control and are not covered by this Privacy Statement. If you access other websites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy. We are not responsible for the privacy policies or the content of any third party website.

9. Contact us

If you have any questions or requests relating to this Privacy Statement or personal information that we may hold about you, please refer to the "[Contact Us](#)" section on our Website.