

## CHUBB PRIVACY POLICY

### Data Protection at Chubb

At PT Chubb General Insurance Indonesia (“**Chubb**”, “**we**”, “**us**”), we routinely collect and use personal data about individuals, including insured persons, claimants or business partners (“**you**”). We are aware of our responsibilities to handle your personal data with care, to keep it secure and comply with applicable data protection laws. Most of all, we respect your privacy and want you to understand the ways in which we collect and use information provided online.

This Internet Privacy Policy applies to [www.chubb.com](http://www.chubb.com) and other websites or mobile applications that link to this Policy (the “Online Services”). It does not apply to [www.combinedinsurance.com](http://www.combinedinsurance.com) and any non-Chubb websites or mobile applications that you may access via the Online Services. Such services are governed by the privacy policies appearing on those sites and applications. Depending upon your relationship with us, you may receive other privacy notices from us providing additional detail about our privacy practices.

### Important

This Internet Privacy Policy is not intended to override the terms of any insurance policy or contract you have with us, nor rights you might have available under applicable data protection laws.

## 1 What Personal Data do We Process?

We collect two kinds of personal data through the Online Services: “non-personal” information and “personal” information.

Non-personal information can only identify a visitor, user or insured when used in combination with personal information. The non-personal information we collect includes: the visitor’s browser type, device type, and operating system; area(s) of the Online Services visited; date and time of access; host or Internet service provider (ISP) information; and identity of the referring site (any site from which the visitor accesses the Online Services).

We also collect personal information that can be used to identify a visitor, user or insured. Personal information that we collect are as follows:

- Your name, address or other contact information;
- Policy information;
- Claim information (including materials you submit as part of your claim);
- Customer service requests;
- Information provided for roadside assistance services; and
- Other information that you choose to provide to us, but only when you voluntarily provide it.

If you apply for a job or register with our Career Center, we may collect personal information about your work and educational history.

In addition, certain of the Online Services may collect precise information about the location of your mobile device but only with your express consent. Once you have consented to the collection of the

precise location of your mobile device, you may adjust this consent by managing your location services preferences through the settings of your mobile device.

## **2 How We Collect Your Personal Data**

We obtain your personal data from the following sources:

### **Prospective policyholders, insureds and beneficiaries**

- We will collect information from you directly when you apply for a policy.
- Information about you may also be provided to us by an insurance broker, your employer, family member or any other third person who may be applying for a policy which names or benefits you.
- We may collect information about you from other sources where we believe this is necessary to manage effective underwriting of the risk associated with a policy and/or helping fight financial crime. These other sources may include public registers and databases managed by credit reference agencies, government agencies, insurance association and other reputable organizations.

### **Claimants**

- We will collect information from you when you notify us of a claim. You might make a claim to us directly or through your representative or through your broker or one of our representatives who manage claims on our behalf.
- We may also collect information about you if the claim is made by another person who has a close relationship with you or is otherwise linked to the claim - for example if the policyholder is your employer, or if you are the subject of a third party claim.
- We may also be provided with information by your lawyers (or acting on behalf of your employer).
- We may collect information from other sources where we believe this is necessary to assist in validating claims and/or fighting financial crime. This may include consulting public registers, social media and other online sources, credit reference agencies and other reputable organizations.

### **Business Partners and Visitors**

- We will collect information about you if you or your company provides your contact or other information to us in the course of working with us, either directly as a business partner or as a representative of your company.
- We may also collect information about you if you attend meetings, events or conferences that we organize, contact us through our website or sign up to one of our newsletters or bulletin services.
- We may collect information from other public sources (e.g. your employer's website) where we believe this is necessary to help manage our relationships with our business partners.

### **Others**

- We will collect information from cookies used on the websites.

Please refer section 8 below on how we use cookies.

## Applicable to all

If you telephone Chubb (for example, when notifying a claim or discussing that claim with us) or if Chubb telephones you (for example, to sell an insurance policy) we may record the telephone call. We may also use Interactive Voice Response (“IVR”) technology to automate responses to voice commands, and to analyze call recording data. We use call recordings as an evidence of your agreement to purchase an insurance policy or submit a claim, to help train our staff and to provide an accurate record of the call in case of complaints or queries. We may also analyze call recordings using automated technology in order to detect where there may be customer service failings (and then to resolve these), or to detect potential evidence of fraud.

## 3 Children’s Privacy

Chubb does not seek or knowingly collect personal information from children under the age of 18 who are not insureds, and we request that children do not provide information through the Online Services.

We will ask for a parent or guardian’s express consent for the collection and processing of personal data of child insureds.

## 4 Disabled Persons’ Privacy

In the event that a disabled insured is unable to consent, we will ask for a parent or guardian’s express consent for the collection and processing of the disabled insured’s personal data.

## 5 How We Use Your Information

We may use the information we collect through the Online Services for the following purposes:

Purpose	The basis on which we use the information
Set up a record on our systems	<ul style="list-style-type: none"><li>• Performance of a contract</li><li>• Legitimate interests (to ensure we have an accurate record of all policyholders, insureds we cover)</li></ul>
Carry out background, sanction and fraud checks	<ul style="list-style-type: none"><li>• Legitimate interests (to ensure that policyholders, insureds are within our acceptable risk profile and to assist with the prevention of crime and fraud)</li><li>• Legal obligation</li><li>• If we have specifically asked for it, your consent.</li><li>• Indonesia laws exemption</li></ul>
Consider the underwriting submission, assess risk and write policy	<ul style="list-style-type: none"><li>• Take steps to enter into a contract</li><li>• Legitimate interests (to determine the likely risk profile and appropriate level, cost and type of cover to extend, if any)</li><li>• If we have specifically asked for it, your consent.</li></ul>
Manage renewals	<ul style="list-style-type: none"><li>• Performance of a contract</li><li>• Legitimate interests (to determine whether to extend cover for a renewal period, and if so, on what terms)</li></ul>

Purpose	The basis on which we use the information
	<ul style="list-style-type: none"> <li>• If we have specifically asked for it, your consent</li> </ul>
Provide client care, assistance and support	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>
Receive premiums and payments	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>
Marketing	<ul style="list-style-type: none"> <li>• Legitimate interests (to provide you with information about insurance products or services which may be of interest and/or to communicate to any business partners about events, services or products which may be of interest to their sector)</li> <li>• Consent</li> </ul>
Market research, advanced data analytics, and statistical or actuarial research, reporting or financial assessment undertaken by Chubb, affiliates, business partners or respective regulators	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Consent</li> </ul>
Comply with legal and regulatory obligations/ cooperate with law enforcement	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>
Receive notification of claim	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (third party claimants) (to maintain an accurate record of all claims received and the identity of claimants)</li> </ul>
Assess claim	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (to assess circumstances of a claim)</li> <li>• If we have specifically asked for it, your consent</li> <li>• Establish, exercise or defend legal claim</li> </ul>
Monitor and detect fraud, including to communicate with companies within the financial services and insurance industries, and our respective regulators	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (to monitor, assess and ultimately prevent fraud)</li> <li>• If we have specifically asked for it, your consent</li> <li>• Establish, exercise or defend legal claims</li> </ul>
Settle claim	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests (third party claimants) (to settle claims to successful third party claimants)</li> </ul>
Reinsurance	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Comply with legal and regulatory obligations/ cooperate with law enforcement	<ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>

Purpose	The basis on which we use the information
Manage relationships	<ul style="list-style-type: none"> <li>• Legitimate interests (to maintain an accurate client and partner relationship management platform)</li> <li>• Consent</li> </ul>
Administer contracts	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>
Run events and host office visitors; accommodate website visitors	<ul style="list-style-type: none"> <li>• Legitimate interests (to organize and host events which may be of interest to Business Partners)</li> <li>• Consent</li> </ul>
Monitor and analyze behavior on website; deliver targeted contents and advertisings on website	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Consent</li> </ul>
Transfer of portfolio/books of business	<ul style="list-style-type: none"> <li>• Legitimate interests (to structure our business appropriately)</li> <li>• Legal obligation</li> <li>• Consent</li> </ul>
Sale or reorganization of a Chubb company	<ul style="list-style-type: none"> <li>• Legitimate interests (to structure our business appropriately)</li> <li>• Legal obligation</li> <li>• Consent</li> </ul>
Recording of telephone calls	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interests (to train staff, to provide evidence of intention to enter into an insurance contract, to help resolve complaints, to improve customer service or to detect fraud)</li> </ul>
Internal management, including to develop, manage, process, analyze, improve, design, operate and administer products, services and operations, to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>

We also may anonymize, combine, or aggregate any of the information we collect through the Online Services or elsewhere for any of these purposes or for analyzing usage statistics and trends.

## 6 Who We Share Your Data With

We work with many third parties, to help manage our business and deliver services. These third parties may from time to time need to have access to your personal data.

These third parties may include:

- Brokers, other insurers/reinsurers, third party administrators, loss adjusters and claims experts who work with us to help manage the underwriting process and administer our policies including the claims process as permitted under applicable laws

- Service providers
- Healthcare providers and travel and medical assistance providers
- Our regulators, which includes the OJK, as well as other regulators and law enforcement agencies in Indonesia and around the world
- Agencies and organizations working to prevent fraud in financial services
- Lawyers and other professional services firms and partners such as medical professions, accountants, actuaries, auditors, experts, consultants, banks and financial institutions that service our accounts
- Your employer or company acting on your employer's behalf to monitor, audit or otherwise administer our services and fulfil contractual obligations in relation to our services (in the case that you are entitled to our services because your employer has signed an agreement with us to provide you with insurance cover and other additional covers and services as it may apply)
- Assistance Providers, who can help provide you with assistance in the event of a claim

We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other insurers. If we were to sell or reorganize part of our businesses, we would need to transfer your personal data to the purchaser, transferee of such businesses or other third parties in connection with the sale, reorganization, transfer or disposal of our businesses. We may also share your personal data with any other persons acting for or on behalf of or jointly with Chubb in respect of a directly related purpose for which your personal data was required.

If you provide us with personal information, we will not sell, license, transmit or disclose this information outside of the Chubb Group unless: (1) you expressly authorize us to do so; and (2) to the third parties set out above.

## **7 How We Collect, Use and Protect Identity Card Numbers**

Chubb may collect your personal data, including but not limited to identity card numbers, in the course of our business. We strive to protect the confidentiality and security of identity card number in our possession, custody or control by: (i) limiting access to identity card number; and (ii) maintaining reasonable administrative, technical and physical safeguards to protect against the loss, misuse or unlawful disclosure of identity card number.

## **8 How We Use “Cookies” and Other Data Collection Tools**

**Cookies.** Chubb may place electronic “cookies” in the browser files of your computer or mobile device when you access a Chubb website. Cookies are pieces of information that a Chubb website transfers to your computer or mobile device to enable our systems to recognize your browser and to tailor 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 particular services over the website, cookies enable us to present information tailored to your account and/or those particular interests the next time you visit the website. Moreover, Chubb or our third-party service providers or business partners may place cookies on your computer or mobile device that can be matched to other personal information we maintain about you to pre-populate certain online forms for your convenience. We also use cookies to analyze visitors’ use of our websites. This analysis helps us better understand which areas of our sites are most useful and popular so we can plan

improvements and updates accordingly. 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.

## 9 Why are cookies important for the use of Chubb websites?

We use cookies to improve the functionality of this website and to track information about how the website is used in order to continually improve it and personalize it to user preferences. In particular:

1. Cookies enable an individually tailored use of the websites. Some functions on our websites cannot be used without cookies, i.e. logging in or changing settings. Cookies need to be enabled for optimal use of the website.
2. We are unable to monitor visitor numbers for our website without cookies. Security and fraud risks on our site increase without this information, which is something we wish to avoid.
3. Cookies allow us to check how users access and navigate our site. This is very important in order to make the website better and more user friendly. Please note that cookies can only read the identification number created by the random generator on your computer and can only retrieve information that is directly related to the Chubb website.

## 10 Types of Cookies

Cookies may be either “persistent” cookies or “session” cookies. This website uses both persistent and session cookies.

A persistent cookie consists of a text file sent by a web server to a web browser, which allows us to collect and analyze (on an anonymous basis) traffic and use of this website, monitor the system and improve operating performance, for example, store your preferences to enhance your subsequent visits. It will not be automatically deleted when the browser is closed but is stored by the browser and will remain valid until its set expiration date (unless deleted by the user before the expiration date).

A session cookie is essential to ensure the correct functioning of this website and is used to manage registration/login and access to reserved features. It is stored temporarily during a browsing session and will expire at the end of the user session, when the web browser is closed.

It is also important to be aware that some cookies (which are generally session cookies) are what is known as strictly necessary. Strictly necessary cookies enable you to move around the website and use features which you have explicitly requested. You can disable other forms of cookie while allowing strictly necessary cookies - see “Your Cookies Choices” below.

**Clear GIFs, pixel tags, and other technologies.** In addition to cookies, we may also use other means of passively collecting non-personally identifiable data about your use of our web sites, such as through the use of “clear GIFs” (small pieces of data that may be embedded in images on our web sites that enable us to track your usage of our web sites) and analyzing “click stream” data (the virtual trail you leave behind while browsing the Internet and viewing our web sites). We use clear GIFs and click stream data to gather data about your visit to our web sites and in connection with emails to track response rates.

The data may include information about your device, such as your IP address, but does not identify you by name. Blocking cookies will prevent clear GIFs from tracking your activity, and also prevent us from collecting certain other information, such as your IP address; but we still obtain a record of

a visit. In addition to the information we collect from cookies, from clear GIFs, through the analysis of click stream data, and any other means we may employ to collect non-personally identifiable information about you or your visits to our web sites, we may also obtain anonymous information which you provide to us online -- for example, when you use our tools and calculators.

## 11 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:

- Internet Explorer: <https://support.microsoft.com/en-us/help/260971/description-of-cookies>
- 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 further general information on cookies and more detailed advice on how to disable and enable them please go to <https://www.allaboutcookies.org>.

**Do Not Track.** We and our service providers or third-party ad servers may also use cookies or similar technologies to collect information about your browsing activities over time and across different websites following your use of the Online Services. While, as described above, you may have the opportunity to control the use of cookies through your web browser, we do not currently respond to web browser “Do Not Track” signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. For more information about Do Not Track, please visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

**Third Party Analytics.** We use automated devices and applications, such as Google Analytics, to evaluate usage of our Online Services. We also may use other analytic means to evaluate our Online Services. We use these tools to help us improve our services, performance, and user experiences. These entities may use cookies and other tracking technologies to perform their services. We do not share your name and contact information with these third-party analytics providers; however, these providers may obtain unique identifiers for your device or your IP address.

**Third Party Advertising Networks.** We use third parties such as network advertisers to serve advertisements on third-party websites or other media (e.g., social networking platforms). This enables us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party’s specific privacy policy, not this one. We may provide these third-party advertisers with information about you.



## 12 Security of Internet Communications

We employ reasonable administrative, technical and physical safeguards designed to protect personal information. When you enter sensitive information (such as a credit number or social security number) on our web sites, we encrypt that information using secure socket layer technology (SSL) or similar technology during its transmission to our web site. Unfortunately, no method of transmitting or storing data can be guaranteed to be secure, and in particular we do not assume any responsibility for any harm, loss or damage you may experience during transmission of information by or to Chubb over the Internet. If you believe that the security of any account you might have with us has been compromised, please contact us using one of the methods described below.

We restrict access to personal information collected about you at our web sites to our employees, our affiliates' employees or others who need to know that information to provide services to you or in the course of conducting our normal business operations.

## 13 Your Rights and How to Contact Us

As a data subject, you have the following rights, in each case, subject to limitations under Indonesian data protection regulations:

- You may request us to complete, update and/or fix errors and/or inaccuracies in your personal data;
- You may request access to, and a copy of, your personal data; and
- You may withdraw your consent to our processing of your personal data in part or in full, request us to terminate our processing, erase, and/or destroy your personal data, and request us to limit or delay our processing of your personal data. Please note that, if such request to withdraw, terminate, destroy, limit or delay our processing of your personal data such that we would not be able to serve you in accordance with the policy, we are entitled to terminate your contract with us in accordance with the terms and conditions of the policy.

If you have a question or would like to submit a request, please log into your account for the particular Online Service or send a letter or email to the address below with your question or requesting to see your information. We will be happy to accommodate your request whenever possible but may not be able to provide information relating to investigations, claims, litigation and other matters.

Please address requests to:

### Chubb in Indonesia

- Attention: Customer Service
- Email: [contact.id@chubb.com](mailto:contact.id@chubb.com)

### Chubb Group

- Attention: Privacy Inquiries
- 202 Hall's Mill Road, P.O. Box 1600 Whitehouse Station, NJ 08889-1600
- Telephone: 1-800-258-2930
- Email: [privacyinquiries@chubb.com](mailto:privacyinquiries@chubb.com)

## **14 Automated Profiling and Decision-Making**

We may use your personal data to make automatic decisions which may affect you or to conduct other profiling (such as marketing profiling) only to the extent that it complies with prevailing laws and regulations.

## **15 Blogs and Other Interactive Features**

We may offer blogs, online forums or other interactive features on the Online Services that enable you to share information about our services or other issues of interest. You should be aware that any communications you submit or post to any such interactive features on the Online Services may be viewable by other participants or users. Therefore, by submitting or posting to such interactive features you acknowledge and agree that you have no expectation of privacy or confidentiality in the content you submit for such features, whether or not it contains personal information about you.

## **16 Links to Other Sites**

For your convenience, we may provide links to other web sites and web pages that we do not control. We cannot be responsible for the privacy practices of any web sites or pages not under our control and we do not endorse any of those web sites or pages, the services or products described or offered on such web sites or pages, or any of the content contained on those web sites or pages. Before providing any personal information to such web sites, please be sure to carefully review the web site's privacy policy.

We are not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of other organizations, such as Google, Apple, Microsoft and Facebook or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including any Personal Information you disclose through or in connection with the Apps or our Social Media Pages.

### **Use of Online Services**

If you do not agree to this policy or the site's Terms of Use, please do not use the Online Services. The Online Services are not for use within any country or jurisdiction or by any persons 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.

## **17 Changes to this Privacy Policy**

We may modify or update this Online Privacy Policy at any time in order to address future developments of Chubb, or changes in industry or legal trends.

We will post the change on the home page of the website or app. You can determine when the Online Privacy Policy was revised by referring to the "Updated" legend on the below of this Online Privacy Policy. Where changes to the Online Privacy Policy will have a fundamental impact on the nature of our collection, use or disclosure of your personal data, or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights your rights in accordance with Section 13 of this Online Privacy Policy in relation to your personal data.

## 18 Processing Term and Retention Period.

We will retain your personal data for 10 years after the purposes of collection of personal data (as listed in this policy) have been achieved which include cancellation or termination of the policy, unless an exception applies as set out below.

We will retain your personal data for a longer period in certain circumstances, i.e. (i) where we are required or permitted to do so in accordance with legal, regulator, tax or accounting requirements, (ii) in the event of any complaints or challenges so that we have an accurate record of your dealings with us, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

Where your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be identifiable or used by the business.

Updated February 2024

PT Chubb General Insurance Indonesia is licensed and supervised by Otoritas Jasa Keuangan.



PT Chubb General Insurance Indonesia's information security management system is certified according to ISO/IEC 27001.