

## **Privacy Policy**

### **Chubb Insurance Company of Puerto Rico**

#### **Scope**

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This Privacy Policy ("Policy") describes how Chubb Insurance Company of Puerto Rico ("Chubb") collects, uses, and discloses information from residents of Puerto Rico, including Personal Information, when you visit our websites, including <https://www.Chubb.com/pr-es/> and <https://la.studio.Chubb.com/pr/Chubb/travel/campaign/es-PR> (the "Sites"), or use or apply for any of our products or services that link to or reference this Policy (collectively, the "Services").

This Policy does not apply to any non-Chubb website or mobile application that you may access through the Services. Those websites and services are governed by the privacy policies that appear on those sites and applications. Depending on your relationship with us, you may receive other privacy notices from us that provide additional information about our privacy practices.

Your use of the Services is subject to this.

#### **Personal Information We Collect**

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We collect information that identifies, describes, or is reasonably capable of being associated with you ("Personal Information"). Personal Information does not include publicly available information, such as information that is lawfully made available from government records, information that we have a reasonable basis to believe is lawfully made available to the general public by you or widely distributed media, or a person to whom you have disclosed the information and have not restricted it to a specific audience, or de-identified or aggregated information.

As described below, we collect Personal Information directly from you, automatically through your use of the Sites and Services, and from third-party sources. To the extent permitted by applicable law, we may combine the information we collect from publicly available sources or from third parties. The Personal Information we collect varies depending on your relationship with us.

##### **Personal Information We Collect Directly From You:**

In order to access certain Services, we may collect Personal Information directly from you, including during the quoting, requesting, or handling claims processes. The Personal Information you provide directly to us may include:

- **Identifiers and Contact Information:** We may collect personal identifiers and contact information, such as your name, address, email address, phone number.
- **Government-issued identifiers:** We may also collect information such as your driver's license number, social security number, or other government-issued identifiers.
- **Account Details:** If you register an account with us, we collect information such as your email, phone number or user ID and the password used to log in to your account.
- **Policy or Claims Information:** This includes policy information, claims information, including materials you submit as part of your claim, or other information you choose to provide to us.

**Effective Date: 01/2025**

- **Payment Information:** If you pay a bill, we may collect information necessary to process your payment, such as bank account information, billing address, and any other related information.
- **Commercial Information:** We may also collect information about the products, services, or coverage you purchase.
- **Message Content:** If you contact our customer service team, including through our online web forms, we may collect your messages, emails, or any other information you choose to provide.
- **Audio or similar information:** If you speak to our customer service team over the phone, we may collect a recording for training and quality control purposes.
- **Preferences:** We may also collect information about the types of Services you use, your communication preferences, wish lists, and other preferences you may select in your account or profile.
- **Other Information:** We also collect information when you fill out online forms, surveys, or leave product reviews for us. We also collect any other information you choose to provide.

#### Personal Information We Collect Automatically:

As described below and in the "Cookies and Other Tracking Mechanisms" section, when you visit our Sites or use our Services, we may automatically collect certain Personal Information, including:

- **Device Identifiers:** We automatically collect IP address, unique device ID, device type, browser type, location information, and information about your browser and browser language.
- **Network Activity:** We may also collect information related to how you interact with the Services and advertisements, such as page views, clicked links and items and other activity information, referring URLs, browsing history, and other similar information. We may use analytics providers and technologies, including cookies and similar tools, to collect this information.
- **Geolocation:** We may also collect geolocation information, such as physical location or movements. In addition, depending on your device settings, if you visit our Sites or use our mobile applications, we may collect geolocation information from your IP address that links to the region in which you live.

#### Personal Information We Collect from Other Sources:

We may collect information about you from our affiliates, business partners, and suppliers, including from administrators, adjusters, agents, brokers, or other representatives who provide services or products on our behalf. For example, we may collect information about your policies, including coverage or claims information, through these sources. We may also receive information from consumer reporting agencies, including motor vehicle reports or information about your credit or creditworthiness, and from other publicly available sources.

#### **How We Use Personal Information**

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We may use the Personal Information we collect for the following purposes:

- ✓ Operate our business: We use the Personal Information we collect to enable you to maintain your account and run our day-to-day operations.
- ✓ Provide Products and Services to You: We use the Personal Information we collect to provide, renew, or modify products and services to you. We also use this information to maintain your coverage and memberships, including to set up a product or service, service your policy, change your policy, handle a claim, or complete a transaction.
- ✓ Communicating with you: We use the Personal Information we collect to communicate with you about your use of our sites and services, to respond to your inquiries, to provide you with the information and documents you request, and for other customer service purposes.
- ✓ Evaluate and improve our products and services: We use the Personal Information we collect to evaluate, analyze, improve, and develop our products and services, including this site. We also use this information to tailor the content and information we may send or display to you, to offer you location personalization and personalized help and instructions, and to personalize your experiences while using our Services.
- ✓ Analytics Models to Support Our Business: We use the Personal Information we collect in analytics models, such as actuarial, machine learning, artificial intelligence, underwriting, claims, and loss control models, to facilitate and service our business (e.g., to build new products and features). We may also use this information to conduct actuarial or research studies to maintain and develop our products and Services, and to create new offerings or features. We also use this information to administer surveys and questionnaires, for example, for market research or member satisfaction purposes.
- ✓ Marketing and Advertising: We may use your Personal Information for marketing and promotional purposes, including to send you promotional communications about products, services, features, and features that we think may interest you. We may send communications by email, regular mail, or we may send push notifications via a mobile device. We may also use your information to show you personalized ads or content online.
- ✓ Inferences: We may use the information we collect to better understand how you access and use our Sites and the products and Services available on our Sites, both on an aggregate and individual basis.
- ✓ Finding Locations on Demand: Upon request, we may use your information to obtain your location from the mobile device or network using your device's Global Positioning System (GPS) functionality, or directly from you. We may use your location information to help you search for information, including searching for an agent, searching for a service provider, or identifying the location of an accident. If you do not want location information to be used, you can turn off the GPS feature on your mobile device.
- ✓ Fraud and Security Purposes: We may use the Personal Information we collect to mitigate fraud and protect Chubb and others. We also use this information to prevent and detect fraudulent, malicious, deceptive violations of our policies and contracts and other potential misuse or illegal activities related to our products, assets, and Services.
- ✓ Legal Requests: We use the Personal Information we collect to investigate, enforce, and apply this Policy and our Terms of Use, and to protect our own rights and interests, such as to resolve any disputes or respond to law enforcement requests, court orders, regulators, or other legal process.
- ✓ Business Transfers: We may also use the Personal Information we collect and receive to consider and implement mergers, acquisitions, reorganizations, refinancings, and other business transactions, and for the administration of our general business, accounting, recordkeeping, and other legal functions.

- ✓ **Other Operational and Business Purposes:** We may use your Personal Information for other operational purposes, including to refer you to our third-party partners as part of a referral program, to fulfill contracts related to the products or services we provide to you.

We may also combine or aggregate any information we collect through the Services or elsewhere for any of these purposes or to analyze usage statistics and trends.

### **How We May Disclose Personal Information**

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Where permitted by applicable law, including where we require your consent, we may disclose your Personal Information to our affiliates, reinsurers, business partners, vendors, service providers, and others, as follows:

- **Affiliates, Reinsurers, Subsidiaries, and Business Partners:** We may disclose the Personal Information we collect with our affiliates, reinsurers, subsidiaries, agents, and brokers. Chubb also partners with other companies to offer products and services, and we may disclose your Personal Information to those organizations, including those that play a role in insurance transactions, such as independent claims adjusters and other claims-related companies. If required by law, we will obtain consent before disclosing Personal Information.
- **Vendors and Service Providers:** We may disclose Personal Information we collect with vendors and service providers who perform functions on our behalf, such as helping to complete transactions and process payments, handling claims, maintaining your policy or membership, and participating in credit reports. We may also disclose your information to vendors and service providers who provide website hosting and analytics, marketing and advertising, email or other communication services, development and research or actuarial studies, customer support, and tax, accounting, and legal services.
- **Marketing and Advertising Partners:** We may also disclose your Personal Information, such as name and contact information, with our marketing and advertising partners to send you content about certain products and services.

We may also disclose your Personal Information in the following circumstances:

- **Business Transfers:** As we continue to develop our business, we may buy, merge, or partner with other companies. We may disclose Personal Information as part of those business transactions (e.g., mergers, acquisitions, financings, asset sales or transfers, bankruptcy or reorganizations, or other similar business transactions), as well as in consideration of such transactions (e.g., due diligence). Whenever possible, we will do so under appropriate confidentiality agreements. Similarly, if all or part of our business or assets, or the Sites are merged or sold to another company, or as part of a bankruptcy proceeding, your Personal Information may be transferred to the surviving or acquiring company.
- **In response to legal process:** Personal Information may be disclosed to third parties, as required by law or a subpoena, or if we reasonably believe that such action is necessary to comply with the law and reasonable requests from regulators, law enforcement, or other public authorities. We may also disclose the information we collect to comply with a judicial proceeding, court order, or other legal process, including in response to national security or law enforcement disclosure requirements.

- To prevent fraud and protect us and others: We may also disclose the Personal Information we collect from you when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy or our Terms of Use, or as evidence in litigation in which we are involved. We may also disclose Personal Information to protect our rights and the rights of others. This may include exchanging information with other companies and organizations for fraud prevention, spam/malware mitigation, and similar purposes.
- Aggregated and Anonymized Information: We may disclose aggregated or anonymized information about users to third parties for marketing, advertising, machine learning, research, or other purposes.
- With Your Permission: We may disclose Personal Information in other ways not described above. If we do so, we will notify you and, if necessary, obtain your consent.

### **Cookies and other tracking mechanisms**

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Our third-party service providers and We use cookies, pixels, tags, and other similar tracking mechanisms to automatically collect information about browsing activity, device type, and similar information within our Services and to target advertising and content through our Services and third-party sites and services. We use this information to, for example, analyze and understand how users access, use, and interact with others through our Services, as well as to identify and resolve faults and errors in our Services and to evaluate, secure, protect, optimize, and improve the performance of our Services.

**Cookies.** "Cookies" are alphanumeric identifiers that we transfer to your device's hard drive through your web browser for tracking purposes. Some cookies allow us to make it easier for you to navigate our Services, while others are used to enable a faster login process, support the security and performance of the Services, or allow us to track activity and usage data within our Service.

**Transparent GIF images, tracking pixels, and other technologies.** In addition to cookies, we may also use pixel tags (sometimes called web beacons or "clear GIFs") to collect information about you and your use of our Services. While cookies are stored locally on your device, pixel tags are embedded invisibly on web pages and online content. We may use them, in connection with our Services, to, among other things, track user activities, help us manage content, and compile usage statistics. We may also use them in the HTML emails we send, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

**Third-party analytics and tools.** We use third-party tools, such as *Google Analytics*, which are operated by third-party companies. These third-party analytics companies may collect usage data (using cookies, pixels, and similar tools) about our Services to provide us with reports and metrics that help us evaluate the use of our Services, improve our Sites, and improve user performance and experiences. For more information about Google's privacy practices, please see Google's Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics opt-out browser add-on to prevent *Google Analytics* from using your data in <https://tools.google.com/dlpage/gaoptout>.

**Tracking across different devices.** Our third-party service providers and We may use the information we collect about you within our Services and on other third-party sites and services

to help Us and these third parties identify other devices you use (e.g., a mobile phone, tablet, other computer, etc.).

**Targeted advertising.** We work with third parties, such as ad networks, channel partners, mobile ad networks, analytics and measurement services, and others to personalize content and display advertising within our Services. We may share certain information with these organizations, and We and they may use cookies, pixel tags, and other tools to collect usage and browsing information within our Services, such as IP address, location information, device ID, cookie and advertising ID, and other identifiers, as well as navigational information. These organizations and We use this information to provide you with more relevant advertisements and content within our Services, and to evaluate the success of such advertisements and content.

**Do not track.** Currently, our Sites do not respond to web browser "Do Not Track" signals.

**Marketing communications.** You can opt out of receiving marketing emails from us by using the unsubscribe feature in any email we send you.

## **Children's Personal Information**

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Our Services are not designed for children and we do not knowingly collect Personal Information from children under the age of thirteen (13). If we learn that we have received information directly from a child under the age of 13, we will delete that information from our systems. If you are a parent or legal guardian and believe that we have collected your child's information in violation of applicable law, please contact us as detailed in this Policy.

## **External links**

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When you use our Services, you may encounter links to other websites that we do not own or control. We are not responsible for the privacy practices of these other sites, including the collection of your Personal Information. You should review the terms and conditions and privacy policies of these other sites before providing your information.

## **Blogs and other features**

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We may offer blogs, online forums, or other interactive features in connection with our Services that allow you to share information about the Services or other topics of interest. You should be aware that any communication you send or post on such interactive features on the Services may be viewed by other participants or users. 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.

## **Safety**

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We have implemented security measures designed to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please note that despite our efforts, no data security measures can guarantee security.

## **Changes to this Privacy Policy**

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This Policy is effective as of the Effective Date. We may change this Policy at any time and from time to time. Any amendments or modifications to this Policy will be effective immediately upon posting and as directed by Chubb. We will inform you of any amendments or modifications by

**Effective Date: 01/2025**





appropriate means, such as posting the revised statement on this page with a new "Last Updated" date. Your continued use of any of our Services following the posting of a revised version of this Policy will constitute your acceptance of the revised Policy.

## **Do Not Call Policy**

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The term "Chubb," as used herein, means Chubb Insurance Company of Puerto Rico and applies to business conducted within Puerto Rico.

Chubb does not make marketing telephone calls (which for purposes of this Policy includes text messages) to numbers listed on a state or federal Do Not Call list (unless permitted by applicable law or authorized by you) or to the number of an individual who has requested not to receive telemarketing calls made by or on behalf of Chubb.

If you have requested not to receive telemarketing calls from us, you will be placed on our internally maintained do-not-call list and will not be called during any future telemarketing campaign within the next five (5) years (or any longer period required by applicable law). Any request to be placed on our internally maintained do-not-call list will be processed within a reasonable period of time, not to exceed thirty (30) days (or such shorter period as may be required by applicable law).

Puerto Rico residents may request to be placed on the internal Do Not Call list by calling 1-800-473-7346.

Chubb employees receive training on how to use our internally maintained do-not-call list; how to document, process, and comply with requests to be placed on the internally maintained Do Not Call List; and proper identification during telemarketing calls. Chubb requires any third party initiating telemarketing calls on Chubb's behalf to comply with this policy. We reserve the right to revise this Do Not Call Policy.

## **How to Contact Us**

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If you have any questions about this Policy, you may contact us at 1-800-473-7346 or email us at [servicioalcliente.pr@Chubb.com](mailto:servicioalcliente.pr@Chubb.com).

## **Right to Opt-Out**

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We appreciate your trust and your sponsorship of all of our Services. Chubb reserves the right to disclose the Non-Public Financial Personal Information of its customers or consumers to unaffiliated third parties.

For purposes of this section, the term Non-Public Financial Personal Information shall have the same meaning as that used in Rule 75 of the Puerto Rico Insurance Code.

If you do not want your Nonpublic Financial Personal Information shared with unaffiliated companies, you have the right to request that you be opted out of such disclosure. To do so, complete the Opt-Out Request below and send it to the address below:

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### **Exclusion Request:**

**Effective Date:** 01/2025



Full name of the Customer who opts out:

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Last 4 digits of Social Security: \_\_\_\_\_

Postal Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

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**Chubb Insurance Company of Puerto Rico**

**P.O. Box 191249,**

**San Juan, PR 00919-1249**

**Phone: 1-800-798-5044**

### **Consent**

By using the Services, you express that you understand, accept, and consent to this Policy.

**Last updated: 01/2025.**

**Effective Date: 01/2025**