Chubb Seguros Panama S.A., values having you as one of our clients. That is why we wish to inform you about our Privacy Policy and that we comply with Law 81 of March 26, 2019 on Personal Data Protection and Law 12 of April 27, 2012 that regulates the insurance activity in Panama and concordant rules. Below, we detail our Practices on the handling of your personal information always safeguarding and protecting the information you share with us. This Privacy Policy includes examples of the types of personal information we collect and the companies with which we share that information. These examples are illustrative and should not be considered a complete inventory of our collection, use and disclosure of information. We also provide you the opportunity to prevent us from sharing your personal information with companies that are not our affiliates.

Chubb Seguros Panamá S.A. strongly believes in maintaining the confidentiality of any personal information we collect from visitors to our websites. We want you to understand how and why we collect, use and disclose the personal information you provide to us on our websites.

## Definitions

For the purposes of this Protocol of Policies of Use, Treatment, Access to Information and Data Protection, the expressions shall have the meaning attributed to them below:

1. Storage of data: Storage or custody of data in a database of Chubb Seguros Panama S.A. or third parties that we subcontract for an activity authorized by the User and/or Panamanian regulations.

2. Consent: Manifestation of the will given by the user for Chubb Seguros Panamá S.A. to collect, use, have access to, process and transfer all or part of the data and information provided by the user, as long as it is done according to the provisions of this Protocol of Policies of Use, Processing, Access to Information and Data Protection and the concordant norms of the Republic of Panama.

3. Chubb Seguros Panamá S.A.: Refers to the corporation organized under the laws of the Republic of Panama and registered in the Public Registry under folio No. 608350.

4. Personal Data: information concerning natural persons, which identifies them or makes them identifiable.

5. Sensitive data: that which refers to the intimate sphere of its owner, or whose improper use may give rise to discrimination or entail a serious risk for the owner. By way of example, personal data that may reveal aspects such as racial or ethnic origin; religious, philosophical or immoral beliefs or convictions; union membership; political opinions; data relating to health, life, sexual preference or orientation, genetic data or biometric data, among others, subject to regulation and aimed at univocally identifying a natural person, are considered sensitive.

6. Data Processing: Any operation or technical procedure that allows Chubb Seguros Panamá S.A. or the companies of the same economic group to collect, store, record, organize, organize, elaborate, select, extract, confront, interconnect, associate, dissociate, communicate, assign, exchange, transfer, transmit or cancel User's data or use them in any other way.

7. User: Client, insured or person who uses the services of Chubb Seguros Panamá S.A. or who provides his/her data.

Which information we collect

We obtain two types of information through our digital channels: Non-personal data and Personal data.

**Non-Personal** Data collected includes: type of browser used by the visitor, type of device, and operating system; area(s) of the digital channels visited; date and time of access; server provider or Internet Service Provider (ISP); and identity of the site from which it was derived (the site from which the visitor accessed the Online Services); IP Address; Media information (e.g., social media, digital and broadcast advertising engagement); how the user uses our digital channels and mobile apps, search terms, pages of our mobile apps that you visit and app performance; the location of the mobile device, if authorized by the user's device settings.

We also obtain **Personal Data** that may identify the visitor, user or policyholder, including but not limited to name, address and other contact information, policy information, claim information (including material submitted as part of the claim), customer service request, information provided for roadside assistance services, or other information you choose to provide to us, but only when you provide it voluntarily. If you apply for a job or enroll in the Career Center, we may obtain personal information about your employment and educational background. Also, certain online services may obtain precise mobile device location information, but only with your express consent. Once you have consented to the collection of your mobile device's precise location, you may adjust this consent through the location services preference management in your mobile device's settings.

How do we collect personal data and non-personal information through Digital Channels

1. You provide it to us: We collect information that you enter in our digital channels and/or in our customer service offices through applications and other forms or documents such as your name, address, personal identification number, income and beneficiaries.

2. Contractual relationship of the insured with Chubb Seguros Panama S.A. and/or our affiliates: example of your insurance policy, premiums and payment history.

3. Information provided by third parties authorized by the user: such as credit bureaus or other providers, insurance brokers, medical personnel.

4. Automated information collection: We may link the information collected automatically with information we already have about you in our database in order to identify you as a unique user of Chubb Seguros Panama S.A. This allows us to offer you a personalized experience regardless of how you interact with us: online, at one of our service offices, by mobile device, etc.

To provide you with the best possible user experience, we also use automated information collection technologies for reporting and analysis purposes. We examine metrics such as how you shop on our website, in our stores and in our mobile applications, the performance of our marketing initiatives and your response to those marketing initiatives.

5. Automated Information Collection by Third Parties: We and our service providers use anonymous identifiers, such as cookies and other technologies, to collect and store certain types of information.

6. Social Media Widgets: Our sites and mobile applications have social media features such as widgets. These features may collect information about you, such as your IP address and the page you are visiting on our site. They may set a cookie or employ other

tracking technologies to accomplish this. Social media features and widgets may be hosted by third parties. Your interactions with those features are governed by the privacy policies of the companies that provide them.

7. Mobile Device Location Information: If you use a mobile device, your device may share location information (when you enable location services) with our websites, mobile applications, services or other service providers.

# Servers, storage and transmission of information

Your data is stored for the purposes set forth in this document or other documents you enter into with our company and affiliates.

All direct payment gateways adhere to the standards set by PCI-DSS as administered by the PCI Security Standards Council, which is a joint effort of brands such as Visa, MasterCard and American Express.

PCI-DSS requirements help ensure the secure handling of credit card information by us.

# Third party services

In general, the third party providers we use will only collect, use and disclose your information to the extent necessary to enable them to perform the services they provide to us. However, certain third party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies regarding the information we must provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so that you can understand how these providers handle your personal information. In particular, remember that certain providers may be located or have facilities located in jurisdictions other than you or us. So, if you decide to proceed with a transaction involving the services of a third-party service provider, then your information may be subject to the laws of the jurisdiction(s) in which the service provider or its facilities are located.

Once you leave our website and are redirected to a third party website or application, you are no longer governed by this Privacy Policy or our website's Terms of Service.

#### Information we share

On occasion, we may share the information described above, as permitted by law, with the following persons:

- affiliates dedicated to the sale of property, casualty, accident and health insurance.
- financial service providers, such as insurance agents and general insurance agencies.
- non-financial companies, such as companies that provide document mailing services.
- marketing companies that provide us with direct marketing and telemarketing services to offer our products.

We will only disclose your personal and sensitive information in the cases and in the manner provided by the Panamanian data protection law and concordant rules. Notwithstanding the foregoing, by giving us your personal and/or sensitive data, you agree that we may share them with companies of our same economic group or with our suppliers that we require in order to evaluate, manage, process and provide the services we provide you or perform any other activity that you authorize us through this document or any other that you sign with us in the future. These companies could be dedicated to marketing services, be our accountants, lawyers, auditors, credit history list, among others.

## How we use your information

We use information obtained through digital channels for various purposes, including:

- to offer, contract, renew and modify products and services;
- process payments, prepare credit documentation requested by the user and evaluate the user's creditworthiness;
- to provide requested information and documents and for other purposes related to customer service;
- to process claims;
- assert our contractual rights;

- to provide information about the services or notifications requested, whether physical or digital;
- to send marketing communications or promotional materials that may be of interest and to help us determine relevant advertising;
- administer promotions we may offer, surveys and focus groups, interest-based advertising, and conduct research and analysis;
- to improve the services provided and the usefulness of digital channels;
- to personalize your experience when using our digital channels;
- to comply with applicable laws;
- to conduct due diligence investigations and mailings;
- to prevent and detect fraud, violations and other possible misuses; and
- for any other activity that is authorized by the user in writing.

In addition, we may anonymize, combine or merge information obtained through digital channels or otherwise for any of the above purposes or for statistical and trend analysis.

Personal information provided by you will not be sold, licensed, transferred or disclosed outside the Chubb Group unless: (1) you expressly authorize such actions; (2) it is necessary for our contractors or agents to provide services to you; (3) it is necessary to provide our products or services to you; (4) it is disclosed to entities that provide marketing services on our behalf or to entities with which we enter into joint marketing agreements; (5) in connection with a merger, consolidation, acquisition, divestiture or other corporate restructuring of all or part of our business; or (6) it is otherwise required or permitted by law.

# Age of consent and truthfulness of the data

By using this site, you declare that you are at least the age of majority in the Republic of Panama and have given us your consent for the use of your personal data. You also declare that the data provided are true and if not, it will be sufficient reason to refuse to provide any service or terminate them in advance and without penalty for Chubb Seguros Panamá S.A. Policy on information from previous customers

Chubb Seguros Panama S.A., may share information about its former customers in the same way it does with its current customers. Information about former customers is retained for the time required by local laws and regulations governing the insurance industry.

#### Security Measures

Chubb Seguros Panamá S.A., limits access to your personal information only to those employees who need it to provide services and products to you. We maintain, in addition to the above, the physical and electronic security measures necessary to safeguard the confidentiality of your information, as required by law and our Privacy Policy.

## - Security in Internet communications

The Internet is not a secure medium. We implement administrative, technical and physical safeguards designed to protect personal information. When you enter sensitive information (such as a credit card number) on our websites, we encrypt the information using SSL or similar technology during transmission to our website. Unfortunately, no method of transmitting or storing data can be guaranteed secure, and we assume no responsibility for any damage or loss caused by the transmission of information by or to Chubb over the Internet. If you believe that the security of an account you have with us has been compromised, please contact us by one of the methods described below.

We restrict access to personal information collected about you on our websites to our employees, employees of our affiliates or others who may need that information to provide services or in the ordinary course of business.

## Sensitive Data

Sensitive data to which Chubb Seguros Panamá S.A. has access will not be transferred except in the following cases:

1. When the user has granted his authorization, except in those cases in which by law the granting of such authorization is not required;

2. When it is necessary to safeguard the user's life and the user is physically or legally incapacitated. In these cases, the user's guardians, conservators or those who have the guardianship of the user must grant authorization to transfer such information.

3. When it refers to data that are necessary for the recognition, exercise or defense of a right in a process with competent judicial authorization.

4. For historical, statistical or scientific purposes. In these cases, Chubb Seguros Panamá S.A. will proceed to dissociate the user's identity.

5. Any other reason the legal norms allow it.

## How do you give us your Consent?

When you provide us with personal, confidential and/or sensitive information, it is because you accept that we collect and use it for the reasons established in this document or in those that you subscribe with Chubb Seguros Panamá S.A. For our part, we commit ourselves to only request the information that we require as authorized by the user in this Privacy, Treatment, Access to Information and Data Protection Policy and the concordant norms of the Republic of Panama.

Changes in the Privacy Policy

Chubb Seguros Panamá S.A., reserves the right to modify or amend this Privacy Policy.

Any modifications or changes to this Privacy Policy will be effective immediately upon posting. Your continued use of our website after a revised version of this Privacy Policy has been posted will constitute acceptance of the revised Policy.

The information contained in this Privacy Statement of our digital channels must not be used by any person or in any country or jurisdiction where its use would constitute a violation of the law. If this is the case, you are not authorized to access or use any information contained in this website. By using the digital channels of Chubb Seguros Panama S.A. or any digital channel of companies of the same economic group (unless the specific website contains any provision to the contrary), you agree to abide by the terms of this Website Privacy Statement and our Terms of Use. Please periodically review the terms of this Web Site Privacy Statement, as we reserve the right to modify or amend the Privacy Statement or our Terms of Use at any time.

How we use "cookies" and other data collection tools

*Cookies.* Chubb may use electronic "cookies" in the browser files of your computer or mobile device when you access the Chubb website. Cookies are data that the Chubb website transfers to your computer or mobile device so that our systems can recognize your browser and customize 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 a particular service on the website, cookies allow us to present you with information customized to your account and/or particular interests the next time you visit the website. In addition, Chubb or a third party service provider or business partner may use cookies on your computer or mobile device that may be combined with other personal information we have about you to complete certain online forms in advance for your convenience. We also use cookies to analyze visitor usage of our websites. Based on this analysis we better understand which areas of our sites are most useful and popular so that we can plan improvements and updates. Third parties, including Facebook, may use cookies, web beacons, and other storage technology to obtain or receive information from Chubb websites and applications and other places on the Internet, and use this information to provide market research services and identify advertisements to you.

Why are cookies important for the use of Chubb websites?

We use cookies to improve the functionality of the website and to identify information about how the site is used in order to continually improve the site and customize it based on user preferences. In particular:

- 1. Cookies enable us to use the web pages on an individual basis. Some functions of our websites cannot be used without cookies, such as registering or changing settings. Cookies must be enabled for optimal use of the website.
- 2. We cannot track the number of visitors to our website without cookies. Without this information, there are increased risks related to security and fraud on the website, which we wish to avoid.

3. Cookies allow us to check how users access and navigate the site. This is very important to improve the website and make it more user-friendly. It is important to clarify that cookies can only read the identification number created by your computer's random generator, and can only retrieve information that is directly related to the Chubb website.

## Types of cookies

Cookies can be "persistent" or "session" cookies. This website uses both persistent and session cookies.

A persistent cookie consists of a text file sent by a server to a browser, which allows us to obtain and analyze (anonymously) information about web page traffic and usage, monitor the system and improve operational performance, such as saving preferences to improve subsequent visits. It is not automatically deleted when the browser is closed, but is stored and will remain valid until the set expiration date (unless deleted by the user before the expiration date).

A session cookie is essential to ensure the correct functioning of the website and is used to manage registration/login and access to reserved functions. It is stored temporarily during a browsing session and expires at the end of the user's session when the browser is closed.

It is also important to consider that some cookies (which are generally session cookies) are what we call strictly necessary. Strictly necessary cookies allow you to navigate the website and use functions that have been explicitly requested. Other types of cookies can be disabled and strictly necessary cookies can be enabled - see "Your cookie choices" below.

Clear GIFs, pixel tags, and other technologies. In addition to cookies, we may also use other means to passively collect non-personally identifiable data about the use of our web pages, such as clear GIFs (small data files that can be embedded in images on the web page and allow us to track the use of our web pages) and to analyze clickstream data (the virtual path you take when you browse the Internet and view our web pages). We use clear GIFs and clickstream data to obtain information about visits to our websites and in connection with e-mails to track response rates. The data may include device information, such as IP address, but does not identify the user by name. Blocking cookies prevents clear GIFs from tracking activity, and also prevents us from obtaining certain information, such as IP address, but we may still have a record of the visit. In addition to information obtained from cookies, clear GIFs, through clickstream data analysis and other means we may use to obtain non-personally identifiable information about you and your visits to our web pages, we may also obtain anonymous information that you provide to us online, for example, by using our tools and calculators.

## Your cookie choices

You can enable and disable cookies by adjusting your browser settings. In this way you can refuse the use of cookies (except for strictly necessary cookies). You can also delete cookies that have already been placed on your device.

It is important to remember that disabling or deleting some or all cookies may affect the proper functioning of some web services (including on this website), and prevent the browsing experience from being trouble-free and more personalized.

Go to the "Help" section of your browser to learn how to adjust your cookie settings, or follow the links below:

- Internet Explorer: https://support.microsoft.com/gp/cookies/en
- Mozilla Firefox: <u>https://support.mozilla.com/en-US/kb/Cookies</u>
- Google Chrome: <u>https://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647</u>
- Safari: <u>https://support.apple.com/kb/PH5042</u>
- Opera: https://www.opera.com/browser/tutorials/security/privacy/

For more information on cookies and more detailed advice on how to disable and enable them, please go to <u>https://www.allaboutcookies.org/es/.</u>

Do Not Track. We and our third party service providers or servers may also use cookies or similar technologies to obtain information about browsing activities over time and across different websites by tracking your use of the Online Services. Although, as we specified above, you have the ability to control the use of cookies through your browser, we do not currently respond to Do Not Track or other mechanisms that serve as a method to prevent the collection of information from networks of websites and online services in which we participate. For more information about the "Do Not Track" feature, please go to www.allaboutdnt.com.

Third-party analytics tools. We use automated devices and applications, such as Google Analytics, to evaluate the use of our Online Services. We also use other analytics tools to evaluate our Online Services. We use these tools to improve our services, performance and user experiences. These entities may use cookies and other tracking technologies to deliver their services. We do not share your name or contact information with these analytics service providers, although they may obtain unique device identifiers or IP address.

Third-party advertising networks. We use third party digital advertising providers to place advertisements on third party websites or other media (e.g., social media platforms). This allows us and third parties to identify advertisements for products and services that may be of interest to you. Digital advertising providers, advertisers, sponsors and/or traffic measurement tools use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their advertisements and to personalize advertising content. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this policy. We may provide these third-party advertisers with information about you.

Access, Rectification, Cancellation and Opposition Rights

If you wish your personal information to continue to be shared with non-affiliated companies, you do not need to return this document. We appreciate your confidence in all of our insurance products and services.

If you would like to know what personal data we store about you, the source and purpose for which it was collected, please complete the Request below with the subject "Access".

If you wish to delete the data we store about you because it is incorrect, erroneous or out of date, please complete the Request below with the subject line "Cancellation".

If you wish to correct the data we store about you as incorrect, erroneous or outdated, please complete the Request below with the subject line "Rectification".

If you do not want your personal information shared, for example between nonaffiliated companies, please complete the Application below with the subject line "Oppose".

Address:

Chubb Seguros Panama S.A.

Business Park, Torre V, 14th Floor Ave. La Rotonda, Panama Mailing address: info.legalpa@chubb.com

Subject Access/Rectification/Cancellation/	Cancellation/Opposition Request:
Client's full name:	
Personal Identification Number:	

Policy Number: \_\_\_\_\_\_ Mailing Address: \_\_\_\_\_\_

Phone:

Your request for rectification, opposition or cancellation will take 5 business days to become effective.

Your request for access will take 10 business days to become effective.

Consent

By using the Online Services, you consent to this Online Privacy Policy and the site's Terms of Use. 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 may not be used within any country or jurisdiction or by any person 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.