



QBE Insurance (Singapore) Pte Ltd

# Privacy Policy

Policy Wording

## 1. Introduction

QBE Insurance (Singapore) Pte. Ltd. (“QBE SG” or “we”) and affiliate companies of QBE Insurance Group Limited (“QBE”) are committed to protecting the personal data of our customers. The Privacy Policy (“Policy”) is designed to help you understand why and how we collect and use your personal data and to whom data access or “opt-out” requests can be addressed. QBE SG reserves the right to amend this Policy without notice at any time and will place any such amendments on this website. Changes will be effective immediately upon being posted on this website.

## 2. How do we collect personal data?

QBE SG mainly collects personal data through application forms for its insurance products via licenced insurance intermediaries (agents and brokers) or during the course of any interactions relating to handling claims. We may also collect personal data via our websites or apps. Our websites use "cookies" to gather statistical information concerning web traffic and usage patterns. Cookies do not track your name, e-mail address, or similar personal information.

## 3. What personal data do we collect?

The types of personal data we collect from you will depend on the circumstances in which that information is collected (for example, as a policyholder, non-policyholder insured or claimant, witness, licenced insurance intermediary, appointed representative, or any other person relating to our business).

We may collect details including but not limited to:

- a) General ID and contact information (for example, your name, address, e-mail and telephone, gender, marital status; DOB, educational background, physical attributes; activity records, such as driving records, photos, employment history, professional licenses; relationship to the policyholder, insured or claimant; and date and cause of death, injury or disability.
- b) Singapore identity card no., passport no., or driver’s or other licence number.  
Bank account details and other financial information (for example, bank/credit card number, bank account number and account details, credit history and credit score, assets, income and any other relevant financial information
- c) Medical/health condition (for example, current or former physical or mental or medical condition, health status, injury or disability information, medical procedures performed, personal habits (for example, smoking or consumption of alcohol), prescription information and medical history. Information to investigate crimes such as fraud and money laundering (for example, insurers can share information about their previous dealings with policyholders and claimants for this purpose.)
- d) Information enabling QBE SG to provide products and services (for example, property address, vehicle license plate or identification number; travel plans; age categories of individuals you wish to insure; policy and claim numbers; coverage/peril details; cause of loss; prior accident or loss history; your status as director or partner, or other ownership or management interest in an organization; and other insurance you hold.) Sensitive information (for example in certain circumstance we may receive sensitive information about your trade union membership, religious

beliefs, political opinions, family medical history or genetic information. In addition, we may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud. We may also obtain sensitive information if you voluntarily provide it to us, for instance if you express preferences regarding medical treatment based on your religious beliefs).

#### **4. What do we use personal data for?**

QBE SG only collects the above personal data to conduct our business, to understand our customer's insurance needs and to provide our customers with better customer services and products.

The purposes for which personal data may be collected and used by QBE SG and QBE include but are not limited to the following:-

- a) Providing insurance, financial services or related products and services to customers and administering, maintaining, managing and operating such products and/or services;
- b) Processing, assessing and determining any applications or requests made by customers for insurance products or services;
- c) Any purposes in connection with any claims made under any insurance products or in respect of any services provided by QBE SG or QBE affiliates including, without limitation, making, defending, analysing, investigating, processing, assessing, determining or responding to such claims;
- d) Sending customers important information regarding changes to QBE SG and/or QBE policies, other terms and conditions, the websites and other administrative information;
- e) Performing any functions and activities related to the insurance products and/or services provided by QBE SG or QBE including, without limitation, procuring reinsurance, auditing, reporting, performing market research, and general servicing and maintenance of online and other services;
- f) Managing the infrastructure and business operations of QBE SG and/or QBE, and complying with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management.
- g) Complying with applicable laws and regulatory obligations (including laws outside Singapore), such as those relating to anti-money laundering and anti-terrorism and legal processes; and responding to requests from public and governmental authorities (including those outside Singapore);
- h) Matching any data held by QBE SG or QBE relating to customers for any of the purposes listed in this Policy;
- i) Meeting the requirements to make disclosure pursuant any law binding on QBE SG or QBE or for the purposes of complying with any regulations or guidelines issued by any regulatory or other authorities which has jurisdiction over QBE SG or QBE;
- j) Exercising any rights QBE SG or QBE affiliates may have in connection with the provision of insurance products and services to its customers;

k) Conducting identity checks, such as for the purposes of verifying a customer's identity in order to respond to that customer's request to be provided with a duplicate policy or other documentation, any request made by a customer to change his/her address in QBE's records, or any request by a customer to change his/her bank account or payment or other details in QBE's records;

l) Conducting credit checks on customers - such as analysing, verifying and/or checking a customer's credit, payment and/or status in relation to his/her ability to use the services;

m) Determining any amount of indebtedness owing to or from a customer, and collecting and recovering any amount owing from a customer or any person who has provided any security or undertaking for such customer's liabilities;

n) Providing improved quality, training and security;

o) Resolving complaints, and handling requests for data access or correction;

p) Preventing, detecting and investigating crime, including fraud and money laundering, and analyse and manage other commercial risks;

q) Enabling an actual or proposed purchaser, assignee, transferee, participant or sub-participant of QBE SG's or QBE's rights or business to evaluate the transaction intended to be the subject of the reorganization, merger, sale, joint venture, assignment, transfer, participation or sub-participation;

r) Marketing to customers the following services and products:

a. insurance related services and products; and

b. reward, loyalty or privileges programmes and related services and products.

These services or products may be provided and/or marketed by QBE SG and/or QBE and/or marketed by marketing companies authorized by QBE SG or QBE; and

s) Any purposes relating to the above or any other purposes in accordance with QBE SG's general policies or those of QBE in relation to insurance and financial services as set out in statements, circulars, notices or other terms and conditions made available by QBE SG and/or QBE to customers.

Please also note that any information provided through the "Careers" section of the website may also be used for interview and recruitment assessment purposes.

## **5. Other Information Collected by QBE**

In addition to personal data, QBE SG may collect other data through its websites. QBE SG and/or QBE and its third-party service providers may collect other information in a variety of ways, including:

a) Using cookies: Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognize your computer and to collect information such as internet browser type, time spent on the Site, pages visited, language preferences. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the Site, or to gather statistical information about the usage of the Site.

b) Through your internet browser: Certain information is collected by most websites, such as your IP address (i.e., your computer's address on the internet), screen resolution, operating

system type (Windows or Mac) and version, internet browser type and version, time of the visit and the page(s) visited. We use this information for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.

c) Using pixel tags, web beacons, clear GIFs or other similar technologies: These may be used in connection with some Site pages and HTML-formatted e-mail messages to, among other things, track the actions of Site users and e-mail recipients, measure the success of our marketing campaigns and compile statistics about Site usage and response rates.

d) We use Google Analytics service, which uses cookies and web beacons to help us understand more about how our website is used by consumers so we can continue to improve it. Google does not have the right to use the information we provide to them beyond what is necessary to assist us.

For more information on Google Analytics service, go to

<https://marketingplatform.google.com/about/analytics/terms/us/>

e) From you: Some information (for example, your location or preferred means of communication) is collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.

f) By aggregating information: We may aggregate and use certain information (for example, we may aggregate information to calculate the percentage of our users who have a particular telephone area code).

Please note that we may use and disclose such other information for any purpose, except where we are required to do otherwise under applicable law.

## **6. Opt out of direct marketing?**

When we collect your personal data we will provide you with an opportunity to opt out of that direct marketing at or before the time we collect such data.

If you do not opt out of direct marketing at that time, but you later decide that you no longer wish to receive direct marketing, you may ask us to cease any further direct marketing by writing to the QBE Personal Data Protection Officer via email or post at:

QBE Insurance (Singapore) Pte. Ltd.

Address: 1 Wallich Street, #35-01, Guoco Tower, Singapore 078881

Email: [info.sing@qbe.com](mailto:info.sing@qbe.com)

On receipt of any opt-out request from you, QBE SG will, at no cost to you, act on your request and ensure that your personal data will not be used as indicated in your request.

## **7. To whom do we disclose personal data?**

Whilst personal data held by QBE SG will be kept confidential, QBE SG may disclose or transfer such data to any of the following classes of persons in fulfilment of any of the purposes listed in section 4 above.

- a) QBE including but not limited to its share service hubs which support QBE SG's operations;
- b) Licenced insurance intermediaries;
- c) Insurance agents and professional advisers;
- d) Companies carrying on insurance and/or reinsurance related business;
- e) Insurance claims investigators;

- f) Associations and federations of insurance companies;
- g) Other service providers providing insurance and/or reinsurance related business;
- h) Marketing companies authorised by QBE for the purpose of conducting marketing activities in relation to QBE SG products.
- i) Any person in connection with any claims made by or under or otherwise involving any products or services provided by QBE SG or QBE.
- j) Any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment, data processing or storage, social media or other services to QBE SG or QBE in connection with the operation of QBE SG or QBE business.
- k) Credit reference agencies or, in the event of default, any debt collection agencies.
- l) Any person under a duty of confidentiality to QBE SG or QBE which has undertaken to keep such data confidential.
- m) Any actual or proposed purchaser, assignee, transferee, participant or sub-participant of QBE SG's or QBE rights or business.
- n) Any person to whom QBE SG or QBE are under an obligation to make disclosure under the requirements of any law, rules, regulations, codes of practice or guidelines binding on QBE SG or QBE including, without limitation, any applicable regulators, governmental bodies, or industry recognised bodies, and where otherwise required by law.
- o) Any registers of claims which are shared with other insurers for the purpose of detecting, preventing or investigating fraudulent claims (and for these purposes, QBE SG may search such registers).

#### **8. How is personal data secured?**

QBE SG and QBE takes the necessary technical, physical, legal and organization measures to handle personal data in a secure manner consistent with the Personal Data Protection Act 2012. Unfortunately, no data transmission over the Internet or data storage system is guaranteed to be 100% secure. If you have reason to believe that your interaction with QBE SG is no longer secure (for example, if you feel that the security of any personal data you might have with QBE SG has been compromised), please immediately notify QBE SG by writing to the QBE Personal Data Protection Officer via email or post at: to:

QBE Insurance (Singapore) Pte. Ltd.

Address: 1 Wallich Street, #35-01, Guoco Tower, Singapore 078881

Email: [info.sing@qbe.com](mailto:info.sing@qbe.com)

Alternatively please telephone us at [+65 6224 6633](tel:+6562246633).

Access to QBE SG's web site's servers is limited to employees, agents, and contractors of QBE SG and QBE. Standard practices require these personnel to preserve the confidentiality of user information they receive while performing their jobs and conducting the business. QBE SG's and QBE staff are trained on how to handle personal data in a secure, confidential and appropriate manner.

## 9. Accessing and correcting your personal data

Each customer of QBE SG has the following rights in respect of the personal data he/she has provided to QBE SG:

- a. to check whether QBE SG holds data relating to him/her and to access such data;
- b. to require QBE SG to correct any data relating to him/her which is inaccurate; and
- c. to ascertain QBE SG's policies and practices in relation to personal data and to be informed of the kind of personal data held by QBE SG.

To exercise any right of access and correction of personal data you may write to the QBE Personal Data Protection Officer via email or post at:

QBE Insurance (Singapore) Pte. Ltd.

Address: 1 Wallich Street, #35-01, Guoco Tower, Singapore 078881

Email: [info.sing@qbe.com](mailto:info.sing@qbe.com)

The QBE Personal Data Protection Officer will, upon satisfying themselves of the authenticity and validity of the access request, make every endeavour to comply with and respond to the request. In accordance with the terms of the Personal Data Protection Act ("PDPA"), QBE SG has the right to charge a reasonable fee for the processing of any data access request.

## 10. Erasure of personal data

We will take all reasonable practicable steps to erase personal data which we hold about you where the personal data is no longer required for the purpose for which it was collected and used. There are certain exemptions under the PDPA which may apply to erasure of personal data, such as if any such erasure is prohibited under any law or it is in the public interest for the data not to be erased.

## 11. Data transfers

Personal data collected in Singapore by operation in Singapore is likely to be transferred to places outside of Singapore (such as to QBE secure data centres, QBE entities, including those which operate shared service hubs, service providers, business partners and governmental or regulatory authorities) in order to carry out the purposes, or directly related purposes, for which the personal data were collected. Where such a transfer is performed, it will be done in compliance with the requirements of the PDPA. The countries/jurisdictions to which personal data is transferred by QBE SG include, without limitation:

- a) Australia;
- b) Hong Kong;
- c) Malaysia;
- d) the Philippines; and
- e) the United Kingdom.

## 12. Your consent and rights

By using our services, making an application or visiting our website, you consent to the collection and use of your information and other activities as outlined in this Policy.

### 13. Queries and comments

We welcome your queries or comments about our Policy and personal data collection and handling practices. Please contact us at [info.sing@qbe.com](mailto:info.sing@qbe.com).





**QBE Insurance (Singapore) Pte Ltd**  
Part of QBE Insurance Group Unique Entity No. 198401363C

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