

# ACE Insurance – Privacy Policy



**ace insurance**

## **ACE's Privacy Policy**

ACE Insurance Limited (“ACE”) is committed to the protection of your personal information.

This Policy is intended to regulate the handling of any personal information that we collect. We have developed this Policy as part of our ongoing commitment to the protection of your privacy.

For a summary of our privacy commitment to you, including the type of information we collect, how we collect it, how to access, correct or update your information or what to do if you have a complaint about the treatment of your personal information, please refer to our privacy statement entitled “ACE Insurance & Your Privacy”, available on our website at [www.aceinsurance.com.sg](http://www.aceinsurance.com.sg) or by contacting us.

## **Objectives**

The objectives of this Policy are to:

- provide a set of privacy standards which govern our procedures and which protect the privacy of your personal information;
- demonstrate our ongoing commitment to protecting your privacy and addressing any privacy concerns that you might have;
- describe the ways in which we collect, use and handle your personal information; and
- facilitate our compliance with any further developments in the protection of privacy.

Below, we provide guidance on how we collect, use and handle your personal information and administer this Policy.

## **Privacy Policy Provisions**

### **Principle 1 – Collection of Personal Information**

ACE will only collect personal information that is necessary for its legitimate functions or activities.

### **Principle 2 – Use and Disclosure of Personal Information**

ACE uses and may disclose personal information held about you in the following ways:

- To carry out the purposes for the collection of such information for which you have consented;
- To provide, market or improve ACE services and products;
- To compile aggregate information for system administration, analysis and in reports to our advertisers or selected third parties, which is statistical data or trade analysis which does not identify any individual.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- We sometimes rely on third parties to carry out particular activities on our behalf. As a result, information collected from you may be shared by ACE with its related corporations, service providers, assessors, call centres, loss adjusters, investigators, mail houses, other insurance companies, agents or business partners and affiliates that we work with in connection with our business.
- ACE reserves the right to disclose your information in circumstances where we believe that disclosure is required under the law, to cooperate with regulators or law enforcement authorities or to protect our rights and property.

### **Principle 3 – Data Security**

ACE will take reasonable steps to protect the personal information it holds from misuse, and loss and from unauthorised access, modification or disclosure.

ACE will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed under Principle 2.

### **Principle 4 – Openness**

ACE has clearly set out in this Policy document its policies on the management of personal information.

A copy of this Policy is available on our [www.aceinsurance.com.sg](http://www.aceinsurance.com.sg) or is available by contacting us.

On request, ACE will take reasonable steps to let you know, generally, what sort of personal information of yours we hold, for what purposes, and how we collect, use and disclosure this information.

### **Principle 5 – Access and Correction**

Where ACE holds personal information about you, ACE will provide you with access to the information on request, in a manner suitable to your reasonable needs, except to the extent that:

- a) providing access would pose a serious and imminent threat to the life or health of any individual; or
- b) in the case of health information, where providing access would pose a serious threat to the life or health of any individual; or
- c) providing access would have an unreasonable impact on the privacy of other individuals; or
- d) the request for access is frivolous or vexatious; or
- e) the information relates to existing or anticipated legal proceedings between ACE and you and the information would not be accessible by the process of discovery in those proceedings; or
- f) access to the information would reveal the intentions of ACE in relation to negotiations with you in such a way as to prejudice those negotiations; or
- g) providing access would be unlawful; or
- h) denying access is required or authorised by or under any law; or
- i) providing access would be likely to prejudice an investigation of possible unlawful activity; or
- j) providing access would be likely to prejudice:
  - i. the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches a prescribed law; or
  - ii. the enforcement of laws relating to the confiscation of the proceeds of crime; or
  - iii. the protection of the public revenue; or
  - iv. the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
  - v. the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders;by or on behalf of an enforcement body; or

- k) where an enforcement body performing a lawful security function asks ACE not to provide access to the information.

ACE will not provide access to information if this would reveal evaluative information generated within ACE in connection with a commercially sensitive decision making process.

ACE will not charge you for lodging a request for access to your information and if ACE levy any charges for providing information, they will not be excessive.

If ACE holds personal information about you and you are able to establish that the information is not accurate, complete and up to date, ACE will take reasonable steps to correct the information so that it is accurate, complete and up to date.

### **Principle 6 – Anonymity**

Whenever it is practicable and lawful, you will have the option of not identifying yourself when dealing with ACE.

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### **Principle 7 – You play a part**

- a) Please note that you play an important and substantial part in protecting the security and confidentiality of your personal information in connection with your use of our website. Where we have given you (or you have chosen) a password which enables you to access any ACE service, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- b) We also advise you that the transmission of information via the Internet is not completely secure, and may be intercepted or accessed by unauthorized third parties. While we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted through our website; any transmission is at your own risk. It is your responsibility to take all necessary security precautions to ensure the integrity of your computer system, to minimize the risks of third parties gaining unnoticed access to your computer system, and to protect your computer system from viruses and other malicious code.

### **Principle 8 – Outside Links and amendments to this Policy**

- a) This Policy only applies to ACE and our website. ACE may promote links to third party websites which are outside our control. These sites may also collect information about you, and use this information according to their privacy practices which may differ from this Policy.
- b) ACE reserves the right to modify this Policy at any time by placing a notice through our website. Continued use of our website signifies acceptance of any such modification.

## **Complaints Handling and Disputes Procedure**

Should you be unhappy about our treatment of your personal information or you believe there has been a breach of this Policy, please contact ACE's Privacy Officer clearly setting out the nature of your concern.

Complaints can be made orally at first, or in writing. Where a complaint is made orally you must confirm the complaint in writing as soon as possible. If you require assistance in lodging your complaint, please contact us.

## **Compliance with this Policy**

ACE implements this Policy through the use of proper procedures to ensure compliance with this Policy.

We generally require that this Policy be observed by external parties who provide services to us and who may come into contact with your information, but we cannot and do not assume any responsibility for any actions or omissions of third parties, including the manner in which they use information received either from ACE or otherwise.

**ACE's Contact Details:  
Customer Service Manager**

**ACE Insurance Limited**  
600 North Bridge Road  
#17-01 Parkview Square  
Singapore 188778

**Telephone:** 6299 0988

**Facsimile:** 6296 2400

