



PRIVACY POLICY














AXA Partners respects your privacy and ensures that all the personal data it handles is processed in accordance with best confidentiality practices and the applicable laws on data protection.

The objective of this policy is to provide you with information regarding how your personal data is handled when you are a current, former, or potential customer of AXA Partners.



The processing operations presented are those carried out while providing you with our products or services you have requested from us.

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UPDATE OF THE PRESENT POLICY

AXA Partners may update this privacy policy from time to time in response to changing legal, technical, or business developments. When updating this privacy notice, AXA Partners will take appropriate measures to inform you, consistent with the significance of the changes made. AXA Partners will obtain your consent to any material changes in this privacy policy if and where this is required by applicable data protection laws. This privacy policy was last updated on 9th May, 2023.



WHO COLLECTS YOUR PERSONAL DATA ON THIS WEBSITE?

AXA Assistance USA, Inc. a company incorporated under the laws of the state of Illinois, United States, having its registered office at 2 Prudential Plaza, 180 North Stetson Avenue, Suite 3650, Chicago, Illinois 60601, also referred to in this policy as “AXA Partners” or “we” or “us”, collects your personal data.



WHAT ARE YOUR RIGHTS TO YOUR DATA?

You have the right to:

- **Know** the personal data that AXA Partners has about you;
- **Rectify your personal data** that we process about you that are inaccurate, incomplete, or not up to date;
- **Know** the identity of any entity that AXA Partners has disclosed your personal data to within the previous 2 years.



HOW TO CONTACT AXA PARTNERS REGARDING THIS POLICY?

If you have any questions, complaints, or comments regarding this information notice or to exercise your rights listed above, please address them by sending an email to complianceamericas@axa-assistance.us. Your request will then be reviewed by the data protection department. AXA Partners may ask you for additional information to confirm your identity and/or to assist in locating the data you are seeking.



HOW TO MAKE A COMPLAINT TO A SUPERVISORY AUTHORITY?

You have the right to raise concerns about how your personal data is being processed by contacting the office of the State Attorney General of the state where you reside, or directly with the Federal Trade Commission (FTC) by visiting the following page: <https://reportfraud.ftc.gov/#/>.



You may also have the right to raise concerns about how your personal data is being processed with a competent supervisory authority in the country, place of work or place where you think an alleged infringement to your rights occurred. To do so, please refer to the website of your local data protection authority.



HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

AXA Partners uses appropriate technical and organizational measures designed to protect the personal information about you. The measures that AXA Partners use provide a level of security appropriate to the risk of the processing activity of your personal information, in line with AXA standards.



IS THE PROVISION OF YOUR PERSONAL DATA MANDATORY?

Whether or not the provision of your personal data to AXA Partners is mandatory will be indicated to you at the time of collection of such data (e.g., by an asterisk on the collection form). If you do not provide the personal data identified as mandatory, AXA Partners may be unable to properly interact with you or properly manage your request in the context of the provision of your eligible benefits or purchased benefits from us; settlement of your claims; offering you additional products and services that we think may be of interest to you, as permitted or as directed by you.



IN WHAT WAY IS YOUR PERSONAL DATA PROCESSED AND FOR WHAT PURPOSES?

Your personal data are processed for the following purposes:

- to provide you with our products or services for which you are eligible, or which you have requested or purchased from us;
- to provide you with assistance services or process your claims;
- to contact you or make you an offer regarding other products or services that may be of interest to you;
- to comply with law.



What personal data do we process about you? **How long will your personal data be kept?**
 (Retention periods determined in accordance with the legislative and regulatory, statutory, conventional or contractual provisions)

Your Personally Identifiable Data: first and last name; home address; home telephone number; mobile number; e-mail address; data of birth; gender; travel plans; bookings; current or former insurance information; information about your family members or individuals who may travel with you or who may be eligible for benefits; etc.

Your health or financial information: bank account information for processing of claim reimbursements; medical complaint; medical claim information; credit card details to process payment for a product or service you are purchasing from us such as credit card number; credit card security code/CCV; credit card expiration date; etc.

The personal data collected through this website is stored in a secure database for 5 years, as of the moment the data is collected, according to our internal policies procedures; personal data related to cases/claims submitted by you through this website, will be stored up to 10 years in an external CRM for processing purposes, in accordance with our contractual obligations.



WHERE DO YOUR PERSONAL DATA COME FROM?

The personal data we process is directly collected from you by/when:

- You request our services, either on the internet, by phone, or by other means;
- You visit our website, we may also use the information we collect to provide services to you and enhance your online experience. For example, if you start a claim on our Web site, but decide to finish it later, we will save your information so you can pick up where you left off. We also use Web Site Information to analyze use of our Web sites. Information that does not identify you, or that you give us for contests and surveys, may be used for marketing purposes.
- We advertise on other companies' Web sites. Some of these sites may use cookies and Web beacons to capture and transmit non-personally identifiable information about you to us or our service providers. We also may use advertising companies to display our ads on Web sites. These companies may use non-personally identifiable information about your visits to Web sites, together with non-personally identifiable information about your purchases and interests from other online and offline sources, to provide ads about goods and services that may be of interest to you. We may share Web site usage information with these companies to manage and target ads and for market research. We and our ad companies may note some of the pages you visit on our site through Web beacons. While serving ads to this site, our ad companies may place or recognize unique cookies on your computer. Information obtained through these processes may be combined with personally identifiable information in order to analyze our marketing efforts.
 - You can choose to have your computer warn you each time a cookie is being sent, or you can choose to reject all or certain kinds of cookies. In most cases, you can do this by changing the settings on your browser (e.g., Internet Explorer, Google Chrome, Safari, etc.). However, if you choose to reject cookies, some Web sites may not function properly. Flash cookies may be managed using the Adobe Flash Player™ Settings Manager available at www.adobe.com.

The personal data we process is indirectly collected through:

- Third parties that make this site and our products and services available to you, such as your employer, your association or organization where you are a member or another third party with whom you are affiliated. Information which may be collected from these third parties includes information such as your name and your eligibility to participate in offers we make to you. We do not collect other personal information about you from these third parties without your permission.
- Your transactions with us and others, including our partners. It includes information such as your American Express card benefits, account balances, claims history, and bank account information for processing of claim reimbursements



TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

AXA Partners may disclose your personal data to:

Internally

- **To other AXA Partners entities:** authorized persons who support us in providing you with the services you have requested or purchased from us which may include operations, claims, and finance departments;

Externally

- To unaffiliated insurance companies who underwrite the policies you purchase and with insurance agents who help provide our products and services to you;
- To unaffiliated third parties that perform services or functions on our behalf including travel assistance services or the marketing of our products or services; or to affect, administer, or enforce a transaction that you request or authorize;
- To affect, administer, or enforce a transaction that you request or authorize;



- To our agents, American Express, the bank which issued your card, your trade group or association and others who may be involved in the sale and marketing of our products and services, processing of applications, and servicing of policies or claims;
- To hospitals, medical providers, travel vendors, or other third parties related to a claim you may make under your policy;
- To others whom we determine need such information to perform insurance or other professional functions for us. These may include parties helping us with administrative services;
- As required by search warrant, subpoena, or legal process to state insurance departments or other law enforcement or government authorities when required by law, or to protect our own legal interests in the event of suspected illegal or fraudulent activities.



IS YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE UNITED STATES?

- As a general rule, the recipients are located in the United States, the European Union (EU) or in countries which provide an adequate level of protection (meaning that your personal data is afforded the same level of security).
 - (i) **Recipients outside of AXA Partners:** all of the unaffiliated entities with which we may share your personal data are required to keep it confidential and use it only for the purposes for which it was shared, and in accordance with data protection obligations included in our agreement with them, except as otherwise permitted by law.
 - (ii) **Recipients within AXA:** when your personal data is transferred to other entities of AXA, this is done in accordance with the Binding Corporate Rules (<https://www.axa.com/en/about-us/our-commitments> - "Find out more" section).



AXA PARTNERS COMMUNICATIONS

- As an AXA Assistance USA customer, you may be contacted by AXA Assistance USA regarding your benefits and our products and services, such as billing notices, confirmations of changes, changes to our products, and other AXA Assistance USA-specific communications. You may not unsubscribe from AXA Assistance USA-specific communications that relate to your primary usage of our service and products and you agree to receive these if you make a purchase.
- AXA Assistance USA may also contact you with offers regarding AXA Assistance products or services which may be of interest to you.
- If you no longer want to receive emails from AXA Assistance USA with offers regarding our products and services, you may opt out of receiving these emails by clicking on the link to "unsubscribe" provided at the bottom of each email. We will endeavor to comply with your opt-out request(s) within a reasonable time period. Please also note that if you do opt out of receiving marketing communications from us, we may still send you other important administrative communications about your benefits or requests you have made from which you cannot opt out.



LINKS TO OTHER COMPANIES ON THE AXA PARTNERS WEBSITE

- The AXA Assistance USA website may contain links to our business partners and links to other sites offering valuable information. If you choose to provide any personal information directly to any of these entities, the collection and disclosure of your personal information by that entity will be governed solely by that entity's privacy policy. AXA Assistance USA makes no representations or warranties regarding these sites.



NOTICE TO RESIDENTS OF ARGENTINA

If you are a resident of the Republic of Argentina, your Personal Data is processed fully in accordance with the provisions of Law 25.326 of the Republic of Argentina, amendments and related laws, and regulatory decrees. The personal data, privacy, purpose, international transfer, safety and use of cookies are treated as described above in this Privacy Policy. The company from AXA's Group in Argentina is AXA Assistance Argentina SA, which is domiciled at Maipú 255, 17th Floor, City of Buenos Aires, CUIT 33-65328406-9, email address datospersonales@axa-assistance.com.ar. The Agency for Control legally set is the Agencia de Acceso a la Información Pública, with authority to hear the reports and claims from users. Visit www.jus.gob.ar/datos-personales.aspx for additional information.



NOTICE TO RESIDENTS OF ECUADOR

In accordance with the Organic Law for the Protection of Personal Data ("LOPDP") of Ecuador, the personal data provided such as: name, age, identification document, postal and home address, email address and city of residence will be treated in order to provide you with the assistance services purchased. Providing this personal data is voluntary, however, it is necessary for the provision of the assistance services. The legal basis for the processing of such personal data is the purchased assistance service and your consent. Your personal data will be processed for the following purpose: (i) provide and attend to the assistance service, (ii) hire the assistance service, (iii) pay assistance reimbursements, (iv) Attention and response to any request, complaint or claims, (v) Notices, advertisements, sending information, bulletins, news related to the products, (vi) The creation of a database including databases of sensitive information as long as they have the respective authorizations and creation of data for statistical and investigative purposes for the adoption of new ones, (vii) Numerical calculations of the assistance product, (viii) Sending of communications notifying the change of address, modifications to the policies of treatment of personal information, (ix) Any transmission, sending and/or transferring information between the companies that are members of the AXA group or third parties related to the provision of the assistance service inside and outside of Ecuador such as the United States and (x) Sharing personal information with networks of providers in charge of attending the service of assistance.



When providing its services, AXA Assistance acts as the data controller and its affiliated companies or third-party providers act as processors. You will have at all times the right to be informed, request rectification and updating, request suspension, request deletion, request the portability of your data and may have the right to oppose the processing of your personal data, in the same way, we indicate that Your data may be kept for the time necessary to provide you with the required assistance services requested, when it is no longer required to use your personal data to comply with contractual or legal obligations, we will delete it from our systems and records or take the necessary measures for its correctness. anonymization, so that you can no longer be identified with them, unless we need to retain your information, including your personal data, to comply with legal or regulatory obligations.

We invite you to contact AXA Assistance through the channels indicated in this document and to consult the personal data policy at the following address <https://cardmember-benefits.axa-assistance.us/contact-us>



Privacy AIG

American International Group (“AIG”) and its subsidiaries and affiliates (each an “AIG Company”, “AIG Companies”, “we” or “us”) is committed to protecting the privacy of the individuals we encounter in conducting our business. “Personal Information” is information that identifies and relates to you or other individuals (such as your dependents). Our aim is responsible handling of Personal Information, balancing the benefits of activities like research and data analytics with our other commitments, including transparency and non-discrimination.

This Privacy Policy describes how we handle Personal Information that we collect through: this website (“the Site”), the software applications made available by us for use on or through computers, mobile devices or other Internet-connected devices (the “Apps”), our social media pages set forth in the links in the footer on AIG.com (our “Social Media Pages”) (collectively, including the Site, the Apps and our Social Media Pages, referred to as the “AIG On-line Services”); and other means (for example, from your application and claim forms, telephone calls, e-mails and other communications with us, as well as from claim investigators, medical professionals, witnesses or other third parties involved in our business dealings with you).

By using the AIG On-line Services, you signify your acceptance of this Privacy Policy.

Please note: This Privacy Policy is supplemented by Privacy Notices tailored to our specific relationships with you, including Privacy Notices that are sent to individuals as required under applicable laws and regulations.

Other websites and services of AIG Companies both within and outside of the United States of America contain different privacy statements to this Privacy Policy, and you are advised to review the privacy statement on each AIG Company website.

Who To Contact About Your Personal Information

If you have any questions about our use of your Personal Information you can e-mail ebusiness.legal@aig.com or write to:

American International Group
Attn: E-Commerce Legal
80 Pine Street, 13th Floor, New York, NY 10005

Personal Information That We Collect

Depending on your relationship with us (for example, as a consumer policyholder; insured person benefiting under another policyholder’s policy, or claimant; witness; commercial broker or appointed representative; or other person relating to our business), Personal Information collected about you and your dependents may include:

General identification and contact information

Your name; address; e-mail and telephone details; gender; marital status; family status; date of birth; passwords on our systems; educational background; physical attributes; activity records, such as driving records; photos; employment history, skills and experience; professional licenses and affiliations; relationship to the policyholder, insured or claimant; and date and cause of death, injury or disability.

Identification numbers issued by government bodies or agencies

Social Security or national insurance number; passport number; tax identification number; military identification number; or driver’s or other license number.

Financial information and account details

Payment card number; bank account or other financial account number and account details; credit history and credit score; assets; income; and other financial information.

Medical condition and health status

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.

Other sensitive information

In certain cases, we may receive sensitive information about you for example, if you apply for insurance through a third party marketing partner that is a professional, trade, political, religious or community organization. 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 example, if you express preferences regarding medical treatment based on your religious beliefs).

Telephone recordings

Recordings of telephone calls to our representatives and call centers.



Photographs and video recordings

Photographs or video recordings created in connection with our insurance or other business activities, including for claims assessment, processing, settlement, and disputes, or for other relevant purposes as permitted by law.

Information to investigate or prevent crime, including fraud and money laundering

For example, insurers commonly share information about their previous dealings with policyholders and claimants for this purpose.

Information enabling us to provide products and services

Location and identification of property insured (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; other insurance you hold; and details on products for which you have or seek a warranty.

Marketing preferences, customer feedback and survey responses

You may let us know your marketing preferences, enter a contest or prize draw or other sales promotion, or respond to a voluntary survey.

Social media account and information from Apps

We may receive certain Personal Information about you when you use our Apps or Social Media Pages, including your social media account ID and profile picture. If you elect to connect any of your other social media accounts to your account(s) on the AIG On-line Services, Personal Information from your other social media account(s) will be shared with us, which may include Personal Information that is part of your profile relating to those accounts or your friends' profiles.

Information from Other Sources

We and our service providers may supplement the Personal Information we collect with information from other sources, such as publicly available information from social media services, commercially available sources and information from our affiliates or business partners.

How We Use Personal Information

We use this Personal Information to:

- Communicate with you and others as part of our business.
- Respond to your requests.
- Send you important information regarding changes to our policies, other terms and conditions, our AIG On-line Services and other administrative information.
- Make decisions about whether to provide insurance and assistance services, and other products and services which we offer, and provide such products and services, including claim assessment, processing and settlement; and, where applicable, manage claim disputes.
- Assess your eligibility for payment plans, and process your premium and other payments.
- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).
- Prevent, detect and investigate crime, including fraud and money laundering, and analyze and manage other commercial risks.
- Carry out research and analysis, including analysis of our customer base and other individuals whose Personal Information we collect as explained in this Privacy Policy.
- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.
- Personalize your experience when using our AIG On-line Services or visiting third-party websites by presenting information and advertisements tailored to you.
- Identify you to anyone to whom you send messages through any of the AIG On-line Services.
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these carefully.
- Facilitate social sharing functionality.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; data analytics; business continuity; and records, document and print management.
- Resolve complaints, and handle requests for data access or correction.



- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering, sanctions and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence).
- Establish and defend legal rights; protect our operations or those of any of our group companies or business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.

International Transfer of Personal Information

Due to the global nature of our business, for the purposes set out above we may transfer Personal Information to parties located in other countries. For example, we may transfer Personal Information in order to process international travel insurance claims and provide emergency medical assistance services when you are abroad. We may transfer information internationally to our group companies, service providers, business partners and governmental or public authorities. By providing Personal Information and other information to AIG, including through the AIG On-line Services, and/or by sending a communication to an "aig.com" e-mail address, you understand and consent to the collection, use, processing disclosure and transfer of such information in the United States and other countries or territories, which may not offer the same level of data protection as the country where you reside, in accordance with the terms of this Privacy Policy. Further, please note that any communication you send to an "aig.com" e-mail address will be routed through the United States.

Sharing of Personal Information

AIG may make Personal Information available to:

Our group companies

Other AIG group companies may have access to and use of Personal Information in connection with the conduct of our business where appropriate.

Other insurance and distribution parties

In the course of marketing and providing insurance and processing claims, AIG may make Personal Information available to third parties such as other insurers; reinsurers; insurance and reinsurance brokers and other intermediaries and agents; appointed representatives; distributors; affinity marketing partners; and financial institutions, securities firms and other business partners.

Our service providers

External third-party service providers, such as medical professionals, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors; travel and medical assistance providers; call center service providers; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; third-party claim administrators; document and records management providers; claim investigators and adjusters; construction consultants; engineers; examiners; jury consultants; translators; and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

Recipients of your social sharing activity

Your friends associated with your social media account(s), other website users and your social media account provider(s), in connection with your social sharing activity, such as if you connect another social media account to your AIG On-line Services account or log into your AIG On-line Services account from another social media account. By connecting your AIG On-line Services account and your other social media account you authorize us to share information with your social media account provider and you understand that the use of the information we share will be governed by that other social media website's privacy policy. If you do not want your Personal Information shared with other users or with your other social media account provider(s), please do not connect other social media accounts with your AIG On-line Services account and do not participate in social sharing using our AIG On-line Services.

Providers of Internet-connected devices and associated software

AIG may make the Personal Information you provide to us via our Apps available to providers of Internet-connected devices and/or associated operating systems and/or software as set forth in the terms of use and/or privacy policies you agree to with those providers.

Governmental authorities and third parties involved in court action

AIG may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, and/or that of our group companies, you or others; and (g) to allow us to pursue available remedies or limit our damages.



Other Third Parties

We may share Personal Information with payees; emergency providers (fire, police and medical emergency services); retailers; medical networks, organizations and providers; travel carriers; credit bureaus; credit reporting agencies; and other people involved in an incident that is the subject of a claim; as well as purchasers and prospective purchasers or other parties in any actual or proposed reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock.

Should you prefer, we will not disclose confidential personal information about you to non-affiliated third parties. You may opt out of those disclosures; that is, you may direct us not to make those disclosures (other than disclosures required or permitted by law). Should you wish to opt out of disclosures to non-affiliated third parties you may contact us by e-mail at ebusiness.legal@aig.com or by writing to:

American International Group
ATTN: E-Commerce Legal
80 Pine Street, 13th Floor, New York, NY 10005.

Personal Information may also be shared by you, on message boards, chat, profile pages and blogs, and other services to which you are able to post information and materials (including, without limitation, our Social Media Pages and Apps). Please note that any information you post or disclose through these services will become public information, and may be available to visitors who access the AIG On-line Services and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the AIG On-line Services.

Security

AIG will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been compromised), or if you have other data security questions or concerns related to AIG, please immediately notify us. (See the "Who to Contact About Your Personal Information" section above.)

When AIG provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures reasonably designed to protect the confidentiality and security of the Personal Information.

If we believe the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail.

Personal Information of Other Individuals

If you provide Personal Information to AIG regarding other individuals, you agree: (a) to inform the individual about the content of this Privacy Policy, and any other applicable AIG Privacy Notice provided to you; and (b) to obtain any legally-required consent of Personal Information about the individual in accordance with this Privacy Policy and other Privacy Notice.

Marketing Preferences

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you. You can also contact us by e-mail at ebusiness.legal@aig.com or by writing to:

American International Group
ATTN: E-Commerce Legal
80 Pine Street, 13th Floor, New York, NY 10005

to tell us your marketing preferences and to opt out.

If you no longer want to receive marketing-related e-mails from AIG on a going-forward basis, you may opt out of receiving these marketing-related emails by clicking on the link to "unsubscribe" provided in each e-mail or by contacting us at the above addresses. We will endeavor to comply with your opt-out request(s) within a reasonable time period. Please note that if you opt out as described above, we will not be able to remove your Personal Information from the databases of third parties with whom we have already shared your Personal Information (i.e., to those to whom we have already provided your Personal Information as of the date on which we respond to your opt-out request). Please also note that if you do opt out of receiving marketing communications from us, we may still send you other important administrative communications from which you cannot opt out.

Social Security Numbers

It is AIG's policy to protect customer and employee Social Security Numbers that we collect in the course of our business as confidential. This includes maintaining physical and electronic security procedures to guard against unauthorized access to Social Security Numbers. In addition, we do not disclose Social Security Numbers to third parties, except where required or permitted by law.



Questions and Concerns

Please contact us as set out in the “Who to Contact About Your Personal Information” section above with any such requests or if you have any questions or concerns about how we process Personal Information.

Other Information We Collect Through our AIG On-line Services

“Other Information” is any information that does not reveal your specific identity, such as:

- Browser and device information;
- App usage data;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you; and
- Aggregated information

How We Collect Other Information

We and our third-party service providers may collect Other Information in a variety of ways, including:

Through your browser or device: Certain information is collected by most websites or automatically through your device, such as your IP address (i.e., your computer’s address on the internet), screen resolution, operating system type (Windows or Mac) and version, device manufacturer and model, language, internet browser type and version, time of the visit, page(s) visited and the name and version of the AIG On-line Services (such as the App) you are using. We use this information to ensure that the AIG On-line Services function properly.

Through your use of the App: When you download and use the App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

Using cookies; online tracking: Cookies are pieces of information stored directly on the device you are using. Cookies allow us to recognize your device and to collect information such as internet browser type, time spent on the AIG On-line Services, pages visited, language preferences, country website preference. We may use the information for security purposes, to facilitate navigation, to display information more effectively, or to personalize your experience while using the AIG On-line Services. In addition, we may use the information to gather statistical information about the usage of the AIG On-line Services in order to understand how they are used, continually improve their design and functionality, and assist us with resolving questions about them. Cookies further allow us to present to you the advertisements or offers that are most likely to appeal to you. We may also use cookies to track your responses to our advertisements and we may use cookies or other files to track your use of other websites. We do not respond to browser do-not-track signals at this time.

Third parties may collect information about your use of the AIG On-line Services and your use of other websites or online services.

Below is a description of some of the cookies we may use on the Site, what they do, what data about you they collect and what we may use them for:

Geo Location cookie – When a visitor visits the Site for the first time we read their location from their IP address and use this information to assume the country site that they want to visit. This method is not entirely accurate, however, so when they navigate to a particular country site we use a cookie to store this information and to store the language that they chose to view the site. The next time they visit the Site we read the cookie and present the same country and language version they used on their last visit. This has the intended benefit that they don’t need to reselect the country site they need each time they visit an AIG site. No Personal Information is collected or used by the cookie.

Site Catalyst cookie (by Adobe) – This cookie enables us to collect and analyze data about how visitors arrive at the Site and then how they interact with the Site, including products they may search, content they may view, and the steps leading up to a completed or abandoned sale. We use this aggregated information to adapt the Site to better serve their and other users’ needs and interests, and to provide more relevant and useful information. The cookie is placed on a visitor’s PC on a temporary basis only. The cookie does not collect or use their Personal Information. Instead, it logs an anonymous code which identifies users and this code “follows” the user in their journey through the Site. We use the aggregated and anonymous information for statistical analysis.

DoubleClick cookies – We place a tracking pixel cookie on to all Site visitors’ computers for the purpose of our banner advertising activity. We use these cookies to know that a visitor has been on the Site before which allows us to display an appropriate banner ad on to an affiliated network website. No Personal Information is collected. One of the advertisement companies that we use is Google, Inc, trading as DoubleClick. For more information on the DoubleClick cookie, or to opt out from the DoubleClick advertisement cookie please visit: <http://www.google.com/privacy/ads/>.



Affiliate cookie – We use a tracking pixel cookie, which is put on a visitor’s PC and collects only the transaction ID (which identifies the affiliated website the visitor has come from) and a time and date stamp. This enables our affiliate network partners to track affiliated sales and ensure an affiliate is credited for a sale referred to us. It does not involve any passing of Personal Information.

Optimost cookie – Optimost is a service provided by Hewlett-Packard to analyze customer behavior when visiting the Site. This service allows us to test variations of our website pages or elements within the pages. The tests will usually result in improvements to the website and the user experience. The cookie has an anonymous “visitor ID” which is a random number generated to identify a visitor, to distinguish between unique and/or repeat visitors. These cookies do not collect Personal Information. To view the Optimost privacy policy, please visit: <https://asp.optimost.com/avatar/privacy-policy>.

Oracle Cookie – We use the services of www.oracle.com to serve a persistent cookie on visitors’ browsers when they first visit our web pages, unless there is already an Oracle cookie on their browser because they have visited a non-AIG site which is also using Oracle’s services. However, visitors’ browsing activity on our web pages will not be combined with visitors’ browsing behavior on other websites using Oracle’s services. We use visitors’ browsing activity on our web pages to understand which pages and content our visitors use or do not use so that we can monitor Site content to best meet our visitors’ needs. For further information please read the Oracle privacy policy.

You can refuse to accept the cookies we use by adjusting your browser settings. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Site and some online products.

- Using pixel tags, web beacons, clear GIFs or other similar technologies: These may be used in connection with some AIG On-line Services and HTML-formatted e-mail messages to, among other things, track the actions of users of the AIG On-line Services and e-mail recipients across the devices they use, measure the success of our marketing campaigns and compile statistics about usage of the AIG On-line Services and response rates. In some instances, we may combine information collected through these technologies with your Personal Information.

We use Adobe’s Omniture 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. Adobe does not have the right to use the information we provide to them beyond what is necessary to assist us. For more information on Adobe’s Omniture service, including how to Opt out, go to <https://www.omniture.com/privacy/policy#optout>

We may use interest-based advertising service providers to customize, target, serve and report on AIG advertisements served across the web and mobile applications, based on information relating to our offline interactions with you, our online interactions with you (on any of your devices) and information received from third parties. To do this, these service providers may use cookies, pixel tags and other technologies to collect information about your and other users’ use of the AIG On-line Services and third-party sites and mobile applications. They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. Our service providers may also match personal information we provide to them with your IP address and serve AIG advertisements to you across the web, based on your IP address. If you would like to opt out of having your information used for these purposes, visit the self-regulatory program opt-out pages at www.aboutads.info/choices/ or www.networkadvertising.org/managing/opt_out.asp to opt out in desktop and mobile web browsers on the particular device from which you access the opt-out options. Download the AppChoices app at www.aboutads.info/appchoices to opt out in mobile applications.

- Using your Physical Location: We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device’s physical location to provide you with personalized location-based services and content. We may also share your device’s physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device’s location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content. In addition, we may obtain the precise geolocation of your device when you use our mobile applications for purposes of providing travel or other assistance services to our clients who are enrolled in such services. In connection with providing travel or other assistance services, and for purposes of developing and improving our actuarial and pricing tools and risk management programs for our commercial insurance clients, we may share your device’s precise geolocation information with our insurance clients and other entities with whom we work to provide our products and services. You may opt-out of our collection and sharing of precise geolocation information by deleting the mobile application from your device, by disallowing the mobile application to access location services through the permission system used by your device’s operating system, or by following any additional opt-out instructions provided in the privacy notice available within the mobile application.



- Using information provided by 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.
- 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 Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, or if we combine Other Information with Personal Information, then, in addition to the uses listed in the “ Other Information We Collect ” section above, we may use and disclose Other Information for all the purposes for which we use and disclose Personal Information.

Third Party Privacy Practices

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the AIG On-line Services link. The inclusion of a link on the AIG On-line Services does not imply endorsement of the linked site or service by us or by our group companies.

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

Use of Services by Minors

The AIG On-line Services are not directed to individuals under the age of eighteen (18), and we request that these individuals do not provide Personal Information through the AIG On-line Services.

Changes to This Privacy Policy

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website.

Please take a look at the “LAST UPDATED ” date at the top of this Privacy Policy to see when it was last revised.