

Last updated: 3 September 2019

## **We value your privacy**

At Asurion (as defined below), we take protecting your privacy seriously. In order for us to provide our services ("services") to you we need to collect and use some of your personal information. We want you to understand what personal information we collect and how it is used.

When you use our services, or by accessing the Asurion website (as set out in the **Country** section below), you acknowledge that you (i) have read and accepted this Policy without exception; (ii) consent to our privacy practices, including our collection, use and disclosure of your personal information as set out in this Policy; and (iii) agree to be bound by the Policy.

If you do not consent to this Policy, please do not use our services or provide any personal information.

In this Policy:

- (a) "we" and "us" means the Asurion entity offering or providing services to you (as identified in the **Country** section below); and
- (b) we set out in the **Country** section below variations to this Policy which apply if your personal information is provided from within one of the countries so listed.

## **What's covered by this Policy**

Any service which links or refers to this Policy and any collection, storage, transfer, sharing, disclosure and handling of your personal information when you use our services which we define below.

This Policy does not cover and we are not responsible for third-party sites or applications that may be linked from our sites; linking to them does not imply an endorsement. You should always review the privacy policy of any third-party site or application.

Please see the end of this Policy for any country specific variations which will apply to you if you receive the services in a country so listed.

## **Personal information we collect**

When you use our services, you consent to us collecting your personal information. Examples of your personal information we may collect include:

- Name;
- Mailing address;
- Email address;
- Cell/mobile/hand phone number;
- Information that identifies your mobile device, such as Electronic Serial Number ("ESN") or International Mobile Equipment Identity ("IMEI") data;
- Device serial number and media access control ("MAC") address;
- Information collected after obtaining your permission during your use of the

- services;
- Any information that you provide as part of requesting our services (a “service request”);
- Other information that personally identifies you or is linked or linkable to you received in the course of providing you with the services, such as the date that you purchase our services, and cookies when you access our website.

Asurion will endeavor to collect personal information directly from you whenever possible. Your personal information may be collected directly from you during your telephone discussions with us, when you submit forms to us, from Asurion affiliated companies, from our records of how you use our services or when you complete on-line interfaces including mobile applications, amongst other sources. By providing your personal information, you expressly consent to our collection of it.

As part of the service request, Asurion or its affiliates may require verification of your identity by requesting that you present your driver’s license, passport, military ID, or other personal identification card. Additionally, in order to process your service request, Asurion or its affiliates may request your shipping and billing information, credit card information or other preferred payment means.

Please note that if we do not have your personal information, we may not be in a position to:

- provide our services to you, (or to a company who we provide services to who you are contracted to), either to the same standard or at all;
- provide you with information about services that you may want, including information about special promotions; and/or
- tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

### **What are the purposes for which we collect, use and disclose your personal information**

Asurion currently, and/or may in the future, collect, use and disclose your personal information as authorised or required by written law and/or for any or all of the following purposes (“Purposes”):

- Fulfill a service or a service request to you;
- Complete your purchase;
- Establish and verify your identity;
- Activate and maintain and your account;
- Handle and resolve billing disputes;
- Monitor and maintain the performance and functionality of the device consistent with your choices;
- Provide technical support and click-to-chat functionality;
- Protect and improve our services;
- Offer updates, notices and other information about product or services available from Asurion or its affiliates as permitted by law. (Note: at any time you may choose to withdraw your consent to Asurion’s use or disclosure of your personal

information for marketing and promotional purposes by contacting Asurion as outlined in [Where to turn with questions](#) section of this Policy);

- Respond to your questions, inquiries, comments and instructions;
- Preventing, detecting or investigating crime and other unlawful activities, including fraud and money-laundering or terrorist financing, and analysing and managing commercial risks;
- Comply with applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- In connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- Update our records and keep your contact details up to date;
- Track and analyze de-identified data and provide such data to third parties that provide services to Asurion;
- Statistical purposes to help improve the service;
- Protect against fraud and potential fraud;
- Notify you of any known breach of your personal information;
- Maintain the security and integrity of Asurion's systems and services;
- Market services related to the services you have subscribed to;
- Transmit to any of our affiliated entities and relevant governmental and/or regulatory authorities, for the aforementioned purposes; and
- Any other related purposes that would reasonably be expected for which you provided the information,

in accordance with consent obtained from you in accordance with local laws applying in the country in which you receive the services.

These purposes may continue to apply even in situations where your relationship with us has been terminated or altered in any way. In such cases, we may still retain personal data relating to you and use or disclose such information for legal and/or business purposes, including for compliance with local laws in the country in which you receive the services.

## **How we share and transfer your personal information**

We may share and transfer personal information within the Asurion group and with Asurion's service providers that we collect about you in countries outside of the country in which you receive the services but only in accordance with the Purposes. We will not use or disclose your personal information to non-affiliated third parties except as disclosed in this Policy.

Asurion may transfer or license your personal information to:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this Policy and only use such personal information for the purposes for which it was provided to them;
- A third-party, in the event of a proposed or actual purchase, sale (including a

liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof in order for you to continue to receive the same or similar products and services from the third-party. In such an event, we will provide notice of any material change to this Policy, or our services, in the manner described in this Policy. In these circumstances, personal information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Asurion may also disclose your personal information to:

- Comply with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- Defend our rights and/or property or the rights and property of others;
- Enforce this Policy;
- Respond to claims that the content(s) of a communication violates the rights of another;
- Detect, prevent or otherwise address fraud, security, or technical issues.

## **How we protect your personal information**

We use commercially reasonable technical, administrative, and physical controls best practices to protect your personal information including data encryption where appropriate; however, since the internet is not a 100% secure environment, we cannot ensure the security of personal information during its transmission between you and us. Accordingly, you acknowledge that when you transmit such personal information, you do so at your own risk. Nevertheless, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. We will notify you of any confirmed security breach of your personal information to the extent required by and in accordance with local laws applying in the country in which you receive the services

## **How long we retain your personal information**

Asurion will retain your personal information as long as necessary to fulfill the purposes outlined in this Policy and in accordance with local laws applying in the country in which you receive the services.

## **How you are notified if this Policy changes**

We may change this Policy from time to time. If we do, we will post the updated Policy with the last revised date. Your continued use of the product or service means that you consent to the updates. You should periodically read the Policy to understand our privacy practices.

If we make material changes to this Policy, then we will publish on Asurion website or email you to seek your affirmative consent if required by local laws applying in the country in which you receive the services.

## **Communicating with you electronically**

By using our services, you agree that we can communicate with you electronically. This includes any required notifications (i.e. legal, technical, regulatory, security, privacy) relating to your use of the services.

## **Commercial messages**

Where required, we will seek your express consent to send such messages. You may withdraw your consent by using the "unsubscribe" link located at the bottom of our messages, contacting us at the address listed above, or by emailing [privacy@asurion.com](mailto:privacy@asurion.com).

## **Your rights related to correction and access**

While we take various steps to ensure the accuracy and completeness of your personal information, we rely upon you to provide accurate and complete personal information when interacting with us.

Upon your request and as allowed or required by local laws applying in the country in which you receive the services and consistent with our applicable partner agreements, you may request Asurion to take the following actions with your personal information: (i) provide you with a copy, (ii) correct, (iii) update, (iv) delete. To make such a request, or if you have a privacy-related complaint, please contact Asurion via postal mail or email as provided in the [Where to turn with questions](#) section of this Policy. We will respond to your request within a reasonable timeframe.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider at <https://feedback-form.truste.com/watchdog/request>.

## **Cookies and Web Beacons**

When you use our website, we may collect certain information by automated or passive means using a variety of technologies such as cookies (small text files created on a computer or device when its web browser loads a website or web application) or web beacons (a transparent image file used to keep track of one's navigation and behaviour through the website).

We use these technologies across our website to enhance your user experience. These technologies that we place on your device may be used to allow us to personalise your online experience, recognise you as a previous visitor, save your user preferences and maintain your login and password information on secure portions of our website. We also use these technologies to analyse how users use our website and to monitor the

performance of our website. For the avoidance of doubt, we do not combine the general information collected through these technologies with other personal data such as to render you identifiable. By using the website, you agree that we can place these technologies on your device.

You have the option of adjusting your browser or device settings to restrict or limit the use of these technologies. However, if you choose to do so, the functionality of the website and your user experience may be affected.

## **Children under 18**

The services are not directed to children under 18. Unless allowed under local laws applying in the country in which you receive the services, we do not knowingly collect personal information from children under 18. If you become aware that your child is accessing the service and providing personal information without your consent in a country where local laws do not permit, please contact us by using the information provided below. We will take steps to remove personal information from our storage systems and terminate the account if a child under 18 has accessed the services in a country where not permitted by local laws.

## **APEC participation**

The Asurion privacy practices, described in this Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).

To learn more about our APEC CBPR Certification click [here](#).

## **Accountability and governance**

Asurion has implemented various measures to monitor compliance with and enforce this Policy.

## **Where to turn with questions**

If you have any questions about this Policy, about our product or service, or want to request access to, correction, or deletion of your personal information, or have a privacy-related complaint or query, please contact:

- (a) the Privacy Officer or privacy contact for the country in which you are based as detailed in the **Country** section below; or
- (b) (if the country in which you are based is not listed in **Country** section below) us by email at [privacy@asurion.com](mailto:privacy@asurion.com).

## **Asurion**

For the purposes of this Policy, Asurion group means the Asurion entity offering or providing services to you and its affiliates including any entity listed in the **Country** section below.

## Country

This section sets out any country specific variations to this Policy, and any further details, as required by the laws of that country.

### (a) SINGAPORE

Privacy contact:	Asurion Global Privacy Officer at <a href="mailto:privacy@asurion.com">privacy@asurion.com</a>
Website:	<a href="http://www.asurion.com.sg">www.asurion.com.sg</a>
Asurion entity:	NEW Asurion Singapore Pte Ltd

### (b) MALAYSIA

Privacy contact:	Asurion Global Privacy Officer at <a href="mailto:privacy@asurion.com">privacy@asurion.com</a>
Website:	<a href="http://www.asurion.com.my">www.asurion.com.my</a>
Asurion entity:	Asurion Technology Malaysia Sdn Bhd

### (c) THAILAND

Privacy contact:	Asurion Global Privacy Officer at <a href="mailto:privacy@asurion.com">privacy@asurion.com</a>
Website:	<a href="http://www.asurion.co.th">www.asurion.co.th</a>
Asurion entity:	Asurion (Thailand) Limited

For the purposes of the **What are the purposes for which we collect, use and disclose your personal information** section:

- Your consent given under this Policy shall be assumed to include the consent for Asurion to provide such data to third parties that provide services to Asurion. Asurion may need to share your personal data with a third party who will be acting as the data processor under Asurion's supervision;
- Asurion will only store your personal information if your consent remains valid after termination or alternation of the service unless you revoke the consent;
- unless Asurion receives specific instruction otherwise from you, Asurion will retain personal data personal data relating to you and use or disclose such information for legal and/or business purposes, including for compliance with local laws in the country in which you receive the services;

For the purposes of the **How we share and transfer your personal information** section, Asurion will only transfer personal information outside of Thailand to recipient countries which have data protection standards commensurate or better than the Thai Personal Data Protection Act;

For the purposes of the **How we protect your personal information** section, Asurion will notify any data breach to the Data Protection Authority within 72 hours of such breach.

For the purposes of the **How long we retain your personal information** section, Asurion will retain your personal information as long as necessary to fulfill the purposes outlined in this Policy while your consents still remain effective and in accordance with local laws applying in Thailand.

The **Children under 18** section will not apply and be replaced by the following:

**Children under 20**

The services are not directed to minors under the age of 20. Unless allowed under local laws applying in the country in which you receive the services, we do not knowingly collect personal information from minors under the age of 20 without the consent of their parents or guardians. If you become aware that your child is accessing the service and providing personal information without your consent in a country where local laws do not permit, please contact us by using the information provided below. We will take steps to remove personal information from our storage systems and terminate the account if a minor under the age of 20 has accessed the services in a country where not permitted by local laws.

**(d) AUSTRALIA**

Privacy contact:	Asurion Global Privacy Officer at <a href="mailto:privacy@asurion.com">privacy@asurion.com</a>
Website:	<a href="http://www.asurion.com.au">http://www.asurion.com.au</a>
Asurion entity:	Asurion (Australia) Limited

In the "**How we share and transfer your personal information**" section above, the first sentence should be read: "We may share and transfer personal information we collect about you in countries outside of Australia, including within Asurion group (including those members located in the USA, the European Union, Philippines, Malaysia, Thailand and Singapore) and with Asurion's service providers (including those located in the USA, Philippines and Malaysia), but only in accordance with the Purposes."

In the section headed "**Where to turn with questions**" the following paragraph should be added "If you are not satisfied with our response you have the right to complain about

our collection and use of your personal information to the Office of the Australian Information Commissioner:"

GPO Box 5218  
Sydney NSW 2001  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Tel: 1300 363 992

[www.oaic.gov.au](http://www.oaic.gov.au)

**(e) NEW ZEALAND**

For the purposes of the **Your rights related to correction and access** section we will provide our response to requests for access to or correction of personal information as soon as reasonably practicable, and in any case no later than 20 working days, from the date of the request.

Privacy contact:	Asurion Global Privacy Officer at <a href="mailto:privacy@asurion.com">privacy@asurion.com</a>
Website:	<a href="http://www.asurion.co.nz">www.asurion.co.nz</a>
Asurion entity:	Asurion New Zealand Limited

In the section headed "**Where to turn with questions**" the following paragraph should be added "If you are not satisfied with our response you have the right to lodge a complaint with the Office of the Privacy Commissioner:"

PO Box 10 094  
The Terrace  
Wellington 6143  
New Zealand

<https://www.privacy.org.nz/about-us/contact/>