



SmartClub

Personal Information Collection Statement (the “Statement”)

In compliance with the Personal Data (Privacy) Ordinance (the “Ordinance”), Blue Cross (Asia-Pacific) Insurance Limited (the “Company”) would like to inform you of the following:

1. PURPOSES FOR COLLECTING PERSONAL DATA

The personal information collected by the Company via the SmartClub membership registration process may be used by the Company for the purposes of:

- (i) membership registration, provision of club benefits and other information about the SmartClub;
- (ii) processing applications for insurance and financial related products and services;
- (iii) marketing services and products (please see further details in paragraph (3) of this Statement);
- (iv) complying with any applicable laws and regulations binding on or applying to the Company or with which it is expected to comply, all of which may be within or outside Hong Kong and may be existing currently and in the future; and
- (v) any other purposes relating to the purposes listed above.

Provision of the requested personal information to the Company is on a voluntary basis. However, failure to supply the required data marked with an asterisk (*) may result in the Company being unable to provide you with services or promotional offers relating to the SmartClub

2. TRANSFER OF PERSONAL DATA

Personal data held by the Company relating to you will be kept confidential but the Company may provide such data to the following parties for the purposes set out in paragraph (1) of this Statement:-

- (i) any agent, contractor or third party service provider who provide services to the Company in connection with the operation of its business;
- (ii) any person or entity to whom the Company is under an obligation or otherwise required to make disclosure according to relevant laws and regulations, all of which may be within or outside Hong Kong and may be existing currently and in the future;
- (iii) third party reward, loyalty, co-branding and privileges program providers;
- (iv) external service providers that the Company engages for the purposes set out in paragraph (1)(iii) of this Statement.

Such information may be transferred to a place outside Hong Kong.

3. USE OF PERSONAL DATA IN DIRECT MARKETING

The Company may use your personal data in direct marketing. Save in the circumstances exempted in the Ordinance, the Company cannot so use your personal data without your consent (which includes an indication of no objection). In this connection, please note that:

- (i) the name, contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data of you held by the Company from time to time may be used by the Company in direct marketing;
- (ii) the following services, products and subjects may be marketed:
 - (a) insurance, financial, banking and related services and products;
 - (b) reward, loyalty or privileges programs and related services and products; and
 - (c) services and products offered by the co-branding partners of the Company and/or any member of the BEA Group (the names of such co-branding partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be);
- (iii) the above services, products and subjects may be provided by the Company and/or:
 - (a) any member of the BEA Group;
 - (b) third party reward, loyalty, co-branding or privileges program providers; and/or
 - (c) co-branding partners of the Company and/or any member of the BEA Group (the names of such co-branding partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be).

If you do not wish the Company to use your personal data in direct marketing as described above, you may exercise your opt-out right by notifying the Company. You may write to the Corporate Data Protection Officer of the Company at the address or fax number provided in paragraph (4) of this Statement, or provide the Company with your opt-out choice in the relevant application form (if applicable).

4. DATA ACCESS AND CORRECTION RIGHT

In accordance with the Ordinance, you have the right to check whether the Company holds personal data about you and to require the Company to provide a copy of such data (data access right) and to correct the data which is inaccurate. Such requests can be made in writing to:

The Corporate Data Protection Officer
Blue Cross (Asia-Pacific) Insurance Limited
29th Floor, BEA Tower, Millennium City 5,
418 Kwun Tong Road,
Kwun Tong, Kowloon,
Hong Kong
Fax: 3608 2938

According to the Ordinance, the Company has the right to charge a reasonable fee for the processing of any data access request.

5. You also have the right, by writing to the Company's Corporate Data Protection Officer at the address or fax number provided in paragraph (4) of this Statement, to request for the Company's policies and practices in relation to personal data and to be informed of the kinds of personal data held by the Company.
6. The Company keeps your personal data only for a period reasonably necessary for any of the above purposes or as prescribed by the applicable laws or regulations.
7. Should you have any query with this Statement, please do not hesitate to contact our Customer Service Hotline at 3608 2988.
8. Nothing in this Personal Information Collection Statement shall limit the rights of individuals under the Ordinance.
9. The Company retains the right to change this Statement.

April 2013

Issued by Blue Cross (Asia-Pacific) Insurance Limited, a member of the BEA Group

「至醒會」

個人資料收集聲明 (「本聲明」)

為依從個人資料 (私隱) 條例 (「條例」) · 藍十字 (亞太) 保險有限公司 (「本公司」) 特此通知閣下以下事項：

1. 個人資料收集目的

本公司透過「至醒會」會員登記程序收集的個人資料可能會用作下列用途：

- (i) 辦理會員登記手續，提供會員優惠和有關「至醒會」的資訊；
- (ii) 處理保險及財務有關的產品及服務申請；
- (iii) 營銷服務及產品 (詳情請參閱本聲明第(3)段)；
- (iv) 遵守任何適用法例，或對本公司具有約束力或適用或要求其遵守的規例 (不論於香港境內或境外及不論目前或將來存在的)；及
- (v) 與上述有關的其他用途。

閣下向本公司提供個人資料乃屬自願性質。然而，若閣下未能向本公司提供標示著星號 (*) 的必須資料，則可能會導致本公司無法為閣下提供「至醒會」之服務或推廣優惠。

2. 個人資料的轉移

存於本公司的個人資料將會保密，但本公司可能會向以下各方透露該等資料作本聲明第(1)段所列出的用途：

- (i) 任何代理人、承包商或就本公司之業務運作向本公司提供服務的第三方服務供應商；
- (ii) 本公司為遵守任何適用法律或規例 (以上不論於香港境內或境外及不論目前或將來存在的) 而有義務或以其他方式被要求向其作出披露的任何人士或機構；
- (iii) 第三方獎賞、客戶或會員、品牌合作及優惠計劃供應商；
- (iv) 本公司為就本聲明第(1)(iii)段所列明的用途而聘用的外判服務供應商。

該等資料可能被轉移至香港境外。

3. 在直接促銷中使用個人資料

本公司可能把閣下的個人資料用於直接促銷，除非本公司已取得閣下的同意 (包括表示不反對)，否則本公司並不可以如此使用閣下的個人資料，但條例所指明的豁免情況除外。就此，請注意：

- (i) 本公司可能把本公司不時持有閣下的姓名、聯絡資料、產品及服務組合資料、交易模式及行爲、財務背景及人口統計數據用於直接促銷；
- (ii) 本公司可能就下列服務、產品及促銷標的進行促銷：
 - (a) 保險、財務、銀行及相關服務及產品；
 - (b) 獎賞、客戶或會員或優惠計劃及相關服務及產品；及
 - (c) 本公司及/或東亞銀行集團任何成員公司的品牌合作夥伴提供之服務及產品 (該等品牌合作夥伴的名稱會在有關服務和產品的申請表格及/或宣傳

資料上列明)；

(iii) 上述服務、產品及促銷標的可能由本公司及/或下列各方提供：

- (a) 東亞銀行集團任何成員公司；
- (b) 第三方獎賞、客戶或會員、品牌合作或優惠計劃供應商；及/或
- (c) 本公司及/或東亞銀行集團任何成員公司之品牌合作夥伴（該等品牌合作夥伴的名稱會在有關服務和產品的申請表格及/或宣傳資料上列明）。

如閣下不希望本公司使用閣下的資料作上述直接促銷用途，閣下可通知本公司行使閣下的選擇權拒絕促銷。閣下可根據本聲明第(4)段所提供的聯絡方法以書面向本公司的個人資料保障主任提出有關要求，或於有關的申請表格內向本公司表達閣下拒絕促銷的意願（如適用）。

4. 查閱及改正資料權利

根據條例規定，閣下有權查詢本公司是否持有閣下的個人資料及要求索取該等資料的複本（查閱資料要求），並要求本公司就不準確的資料作出改正。閣下如欲行使有關權利，請以書面經以下聯絡方法向本公司的個人資料保障主任提出：

香港九龍觀塘道418號創紀之城5期東亞銀行中心29樓

藍十字（亞太）保險有限公司

個人資料保障主任

傳真：(852) 3608 2938

根據條例，本公司有權就辦理任何查閱資料要求收取合理費用。

- 5. 閣下亦有權根據第(4)段所提供的聯絡方法向本公司的個人資料保障主任索取本公司有關個人資料私隱的政策及實務，並獲告知本公司持有的個人資料的種類。
- 6. 本公司只會根據上述任何用途上的合理需要或適用法例或規例規定的期間保存閣下的個人資料。
- 7. 如閣下對本聲明有任何疑問，請致電本公司的客戶服務熱線 3608 2988。
- 8. 本聲明不會限制個人在條例下所享有的權利。
- 9. 本公司保留修改本聲明的權利

2013年4月

由東亞銀行集團成員藍十字（亞太）保險有限公司發出