



**Blue Cross 藍十字**

An AIA Company 友邦保險成員公司

## SmartClub

### Personal Information Collection Statement (the "Statement")

Blue Cross (Asia-Pacific) Insurance Limited (the "Company") is a wholly owned subsidiary of AIA Group Limited. AIA Group Limited, together with its subsidiaries and affiliates are collectively referred to in this Statement as the "AIA Group".

In compliance with the Personal Data (Privacy) Ordinance (the "Ordinance"), the Company would like to inform you of the following:

#### 1. PURPOSES FOR COLLECTING PERSONAL DATA

The personal data relating to you held or collected by the Company (at the stage of, for example, membership registration, provision of club benefits and launch of campaigns) may be used for the following purposes:

- (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, products, advice and other subjects (please see further details in paragraph (3) of this Statement);
- (iv) preparing statistics and conducting research;
- (v) complying with the obligations, requirements and/or arrangements for disclosing and using data that bind on or apply to the Company and/or the AIA Group or that it is expected to comply according to:
  - (a) any law binding on or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
  - (b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of insurance or financial services providers within or outside Hong Kong existing currently and in the future (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information); or
  - (c) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of insurance or financial services providers that is assumed by or imposed on the Company or the AIA Group by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations;
- (vi) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the AIA Group and/or any other use of data and information in accordance with any group-wide programs for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- (vii) enabling an actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation; and
- (viii) 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 including administrative, telecommunications, computer, payment, data processing, storage, investigation and debt collection services as well as other services incidental to the provision of insurance products and services by the Company (such as insurance adjusters, claim investigators, debt collection agencies, data processing companies and professional advisors);
- (ii) any other person or entity under a duty of confidentiality to the Company or the AIA Group including a member of the AIA Group which has undertaken to keep such data confidential;
- (iii) any person or entity to whom the Company or the AIA Group is under an obligation or otherwise required to make disclosure under the requirements of any law or rules, regulations, codes of practice, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of insurance or financial services providers binding on or applying to the Company or the AIA Group or with which the Company or the AIA Group is expected to comply, or any disclosure pursuant to any contractual or other commitment of the Company or the AIA Group with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of insurance or financial services providers, all of which may be within or outside Hong Kong and may be existing currently and in the future;
- (iv) any actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business;
- (v) third party reward, loyalty, co-branding and privileges program providers;
- (vi) co-branding partners and/or marketing partners of the Company and/or any member of the AIA Group (the names of such co-branding partners and/or marketing partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be); and
- (vii) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) 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 AND PROVISION OF PERSONAL DATA IN DIRECT MARKETING

The Company may use your personal data in direct marketing and provide your personal data to the Company's alliance program partners (as defined in paragraph 3(iii) below) for their use in direct marketing. Save in the circumstances exempted in the Ordinance, the Company cannot so use your personal data or provide your personal data to its alliance program partners for their use in direct marketing 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, advice and subjects may be marketed:
  - (a) insurance, annuities, MPF/ORSO, wealth management, credit cards, financial, banking and related services and products;
  - (b) reward, loyalty, lucky draw programs or privileges programs and related services and products;
  - (c) services and products offered by the co-branding partners and/or marketing partners of the Company and/or any member of the AIA Group (the names of such co-branding partners and/or marketing partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be);
  - (d) medical/healthcare and wellness services and products; and
  - (e) charitable/non-profitable, educational, recruitment and training causes.
- (iii) the above services, products, advice and subjects may be provided by the Company and/or the persons/providers below:
  - (a) any member of the AIA Group;
  - (b) third party reward, loyalty, co-branding or privileges program providers;
  - (c) co-branding partners and/or marketing partners of the Company and/or any member of the AIA Group (the names of such co-branding partners and/or marketing partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be); and/or
  - (d) medical/healthcare and wellness service providers (collectively, "alliance program partners");
- (iv) in addition to marketing the above services, products, advice and subjects itself, the Company also intends to provide the data described in paragraph 3(i) above to all or any of its alliance program partners as described in paragraph 3(iii) above for use by them in marketing those services, products, advice and subjects described in paragraph 3(ii) above by contacting you, and the Company requires your written consent (which includes an indication of no objection) for that purpose;
- (v) the Company may receive money or other property in return for providing the data to its alliance program partners in paragraph 3(iv) above.

**If you do not wish the Company to use or provide to its alliance program partners your personal data for use 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 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 of the Company at the following address:

The Corporate Data Protection Officer  
Blue Cross (Asia-Pacific) Insurance Limited  
54/F, Hopewell Centre  
183 Queen's Road East  
Wanchai, Hong Kong

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 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 2839 6333.
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.

Issued by Blue Cross (Asia-Pacific) Insurance Limited  
(202311)



## 「至醒會」 收集個人資料聲明（「本聲明」）

藍十字（亞太）保險有限公司（「本公司」）乃友邦保險控股有限公司的全資附屬公司。在本聲明內，友邦保險控股有限公司連同其附屬公司及聯營公司將統稱為「友邦保險集團」。

為依從個人資料（私隱）條例（「條例」），本公司特此通知閣下以下事項：

### 1. 個人資料收集目的

本公司所存下或（在例如辦理會員登記手續、提供會員優惠及舉辦活動時）收集的關於閣下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、產品、建議及其他標的（詳情請參閱本聲明第(3)段）；
- (iv) 製作數據及進行研究；
- (v) 履行根據下列對本公司及／或友邦保險集團具有約束力或適用或期望其遵守的就披露及使用資料的義務、規定及／或安排：
  - (a) 不論於香港特別行政區（「香港」）境內或境外及不論目前或將來存在的對其具法律約束力或適用的任何法律（例如稅務條例及當中的條款，包括與自動交換財務帳戶資料相關的條款）；
  - (b) 不論於香港境內或境外及不論目前或將來存在的任何法律、監管、政府、稅務、執法或其他機關，或保險或金融服務供應商的自律監管或行業組織或協會所作出或發出的任何指引或指導（例如稅務局作出或發出的指引或指導，包括與自動交換財務帳戶資料相關的指引或指導）；或
  - (c) 本公司或友邦保險集團因其位於或跟相關本地或外地的法律、監管、政府、稅務、執法或其他機關，或保險或金融服務供應商的自律監管或行業組織或協會的司法管轄區有關的金融、商業、業務或其他利益或活動，而向該等本地或外地的法律、監管、政府、稅務、執法或其他機關，或有關的自律監管或行業組織或協會承擔或被彼等施加的任何目前或將來的合約或其他承諾；
- (vi) 遵守友邦保險集團為符合制裁或預防或偵測清洗黑錢、恐怖分子融資活動或其他非法活動的任何方案就於友邦保險集團內共用資料及資訊及／或資料及資訊的任何其他使用而指定的任何義務、要求、政策、程序、措施或安排；
- (vii) 允許本公司的權益或業務的實際或建議承讓人、受讓人、參與人或附屬參與人，就擬涉及或轉讓、出讓、參與或附屬參與的交易進行評估；及
- (viii) 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、承辦人或就本公司之業務運作，包括行政、電腦、付款、資料處理、儲存、調查和收數服務，或就與保險產品及服務相關之其他服務，向本公司提供服務的第三方服務供應商（如保險理算人、理賠調查員、收數公司、資料處理公司及專業顧問）；
- (ii) 任何對本公司或友邦保險集團負有保密責任的其他人士，包括承諾保密該等資料的友邦保險集團任何成員公司；
- (iii) 本公司或友邦保險集團為遵守任何法律規定，或根據法律、監管、政府、稅務、執法或其他機關，或保險或金融服務供應商的自律監管或行業組織或協會所作出或發出對本公司或友邦保險集團具有約束力或適用或期望其遵守的規則、規例、實務守則、指引或指導，或根據本公司或友邦保險集團向本地或外地的法律、監管、政府、稅務、執法或其他機關，或保險或金融服務供應商的自律監管或行業組織或協會的任何合約或其他承諾（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；
- (iv) 本公司的權益或業務的任何實際或建議承讓人、受讓人、參與人或附屬參與人；
- (v) 第三方獎賞、客戶或會員、品牌合作及優惠計劃供應商；
- (vi) 本公司及／或友邦保險集團任何成員公司的品牌合作夥伴及／或營銷夥伴（該等品牌合作夥伴及／或營銷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）；及
- (vii) 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（包括但不限於郵寄公司、電訊公司、電話銷售和直接促銷代理、電話服務中心、數據處理公司和資訊科技公司）。

該等資料可能被移至香港境外。

### 3. 直接促銷中個人資料的使用及提供

本公司可能把閣下的個人資料用於直接促銷，及把閣下的個人資料提供予本公

司的聯盟計劃合作夥伴（如下文第3(iii)段定義）作直接促銷之用。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，或把閣下的個人資料提供予我們的聯盟計劃合作夥伴作直接促銷之用，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、交易模式及行為、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、建議及促銷標的進行促銷：
  - (a) 保險、年金、強積金／職業退休計劃、財富管理、信用卡、財務、銀行及相關服務及產品；
  - (b) 獎賞、客戶或會員、抽獎或優惠計劃及相關服務及產品；
  - (c) 本公司及／或友邦保險集團任何成員公司的品牌合作夥伴及／或營銷夥伴提供之服務及產品（該等品牌合作夥伴及／或營銷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）；
  - (d) 醫療／醫護及保健服務及產品；及
  - (e) 慈善／非牟利、教育、招聘及訓練事務。
- (iii) 上述服務、產品、建議及促銷標的可能由本公司及／或下列各人士／供應商提供：
  - (a) 友邦保險集團任何成員公司；
  - (b) 第三方獎賞、客戶或會員、品牌合作或優惠計劃供應商；
  - (c) 本公司及／或友邦保險集團任何成員公司之品牌合作夥伴及／或營銷夥伴（該等品牌合作夥伴及／或營銷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）；及／或
  - (d) 醫療／醫護及保健服務供應商（統稱為「聯盟計劃合作夥伴」）；
- (iv) 除本公司促銷上述服務、產品、建議及促銷標的以外，本公司同時擬將以上第3(i)段所述的資料提供予以上第3(iii)段所列的聯盟計劃合作夥伴，以供該等人士通過聯絡閣下以在促銷以上第3(ii)段所述的該等服務、產品、建議及促銷標的中使用，而本公司為此用途須獲得閣下的書面同意（包括表示不反對）；
- (v) 本公司可能會因如第3(iv)段所述將資料提供予我們的聯盟計劃合作夥伴而獲得金錢或其他財產的回報。

如閣下不希望本公司使用閣下的個人資料作上述直接促銷用途，或提供閣下的個人資料予我們的聯盟計劃合作夥伴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：

香港灣仔皇后大道東 183 號合和中心 54 樓  
藍十字（亞太）保險有限公司  
個人資料保障主任

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 2839 6333。
- 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。

由藍十字（亞太）保險有限公司發出  
(202311)