Blue Cross 藍十字
An AIA Company 友邦保險成員公司

「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**」或「**我們**」）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「**友邦集團**」，並單獨稱為「**友邦機構**」。

「至醒會」為一項忠誠計劃，鼓勵閣下通過申請保險產品賺取豐富獎賞。「至醒會」由本公司在香港營運、管理、管控及分銷。

為向閣下提供「至醒會」相關服務，我們必須收集、使用及分享有關閣下的一些個人資料。會員與潛在會員期望我們能準確保存他們的資料、保障資料免被操縱及免受錯誤影響、防止被盜用及在未經授權下被公開。我們遵守《個人資料（私隱）條例》（「**條例**」）及所有相關本地法律，以為會員及潛在會員的資料提供安全保障，並確保我們的員工遵守嚴格保安及保密守則。

本聲明旨在通知閣下並闡明我們將向閣下收集哪些個人資料、收集個人資料的原因、個人資料的擬定用途、可能獲轉移個人資料的有關方、可能會向誰收集閣下的個人數據以及有關查閱、檢視及修訂閣下的個人資料的方法。

作為「至醒會」會籍的申請人或「至醒會」會員（統稱「**閣下**」），閣下必須不時向我們提供若干關於閣下的會籍申請，以及與「至醒會」服務有關的個人資料。閣下提供個人資料，純屬自願性質：閣下可選擇不向我們提供所需資料，但這樣可能會限制我們向閣下提供「至醒會」相關服務的能力。在閣下的「至醒會」會籍生效期間，我們亦可能在我們業務的日常業務過程中收集與閣下相關的其他個人資料。

(1) 個人資料收集目的

本公司持有或收集的有關閣下的個人資料，可能會被我們用作下列用途（「**訂明用途**」）：

(i) 處理、管理、執行和實施「至醒會」所提供的要求、交易或會員服務，就有關「至醒會」的更新及未來改動、閣下的「至醒會」會籍與賬戶，或與本聲明所列明的任何相關用途，與閣下保持溝通；
(ii) 個人化、提升及／或發展我們的福利、服務和建議，以滿足閣下在「至醒會」下的需求、執行與「至醒會」相關的功能及活動，包括但不限於維持網上及其他服務、核實身份、資料分析、研究和統計分析；
(iii) 向閣下提供其他與「至醒會」及／或會員計劃的相關服務；
(iv) 處理保險及財務有關的產品及服務申請；
(v) 促進「至醒會」經營公司或友邦機構提供的產品和／或服務的付款，包括但不限於與信用卡發卡機構或其他第三方服務供應商核實信用卡詳細資料，從信貸資料服務機構取得消費者信用報告，以及與「至醒會」、任何友邦機構或任何第三方管理的已知欺詐交易資料庫進行核對程序；
(vi) 營銷服務、產品、建議及其他標的（受本聲明第 (3) 段所規限）；
(vii) 供我們、於「至醒會」提供產品及服務的合作夥伴進行的統計或精算研究；
(viii) 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本公司及／或友邦保險集團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；
  (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規管機構或行業組織或協會所作出或發出的任何指引或指導；或
  (c) 本公司或友邦保險集團因其位於或跟相關本地、國家或外地的法律、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規管機構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、國家或外地的法律、監管、政府、稅務、執法或其他機關，或有關的自律規管機構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；
(ix) 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；
(x) 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，就擬涉及的轉讓、出讓、參與或附屬參與的交易（或其部分）進行評估；及
(xi) 與上述有關的其他用途。

(2) 個人資料的轉移

本公司所持有關於閣下的個人資料將會保密，但本公司可能會向以下各方，不論於香港境內或境外，提供該等資料以符合本聲明第 (1) 段所列出一項或多項的訂明用途：

(i) 獲授權作為本公司代理人以分銷本公司所提供的產品及服務的任何人士；
(ii) 就業務運作（包括行政、電訊、電腦、付款、資料處理、儲存、調查、收債服務、或與「至醒會」相關服務之其他服務）向本公司提供服務的任何代理人、承包人或第三方服務供應者（如保險理算人、理賠調查員、收債公司、資料處理公司及專業顧問）；
(iii) 任何對本公司或友邦保險集團負有保密責任的其他人士或機構，包括承諾保密該等資料的任何友邦機構；
(iv) 將接受本公司及其業務投保的保險公司、為本公司提供保險的保險公司及／或與本公司有或將有商業往來的再保險公司；
(v) 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規管機構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，或為建立、行使或捍衛或保護法律索償、保護本公司或友邦集團的權利、財產或安全，或根據本公司或友邦保險集團向本地、國家或外地的法律、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規管機構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；
(vi) 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；
(vii) 第三方獎賞、客戶或會員、品牌合作及優惠計劃供應商；
(viii) 本公司的品牌合作夥伴及／或營銷夥伴及／或友邦機構（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，視乎情況而定）；
(ix) 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）；
(x) 任何閣下已發出指示、授權及同意本公司向其溝通和提供資料的人士；及
(xi) 任何友邦機構，及其高級人員、僱員、代理、任何內部或外部顧問、專業人士及／或其他顧問。

友邦集團或本公司可能不時收購業務或出售一項或多項本公司業務（或其部分）。 如友邦集團或本公司收購業務，若情況可行及允許，該業務下接收的個人資料將會根據本聲明處理。 如友邦集團或本公司出售業務，銷售合約中將包含要求買方按本聲明所要求的方式處理閣下的個人資料之條款。

(3) 直接促銷中個人資料的使用及提供

如本公司已取得閣下的同意，本公司可以把我們收集的閣下之個人資料用於直接促銷，並將閣下的個人資料向本公司的聯盟計劃合作夥伴（如下文定義）提供作直接促銷如下所述：

(i) 本公司可以把本公司不時收集的閣下之姓名、閣下之聯絡資料、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、退休金計劃、財富管理、信用卡、金融、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／或任何友邦機構的品牌合作夥伴及／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，視乎情況而定）所提供的服務及產品；
  (d) 醫療／醫護及保健服務及產品；及
  (e) 慈善／非牟利、教育、招聘及培訓事務。
(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) 任何友邦機構；
  (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／或任何友邦機構之品牌合作夥伴及／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，視乎情況而定）；及／或
  (d) 醫療、醫護保健及健康服務供應商，

  （統稱為「**聯盟計劃合作夥伴**」）；及
(iv) 除本公司促銷上述服務、產品、建議及促銷標的外，本公司同時擬將向以上第 3 (iii) 段所述的所有或任何人士／供應商提供以上第 3(i) 段所述的個人資料，以供該等人士通過聯絡閣下以在促銷以上第 3(ii) 段所述的服務、產品、建議及促銷標的中使用。本公司在向聯盟計劃合作夥伴轉交閣下的個人資料以作任何直接促銷用途前，將會獲得閣下的書面同意（包括表示不反對）。

如閣下曾向本公司表示同意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或將閣下的個人資料提供予第三方以進行直接促銷，但其後不再希望本公司繼續使用閣下的個人資料作該等用途，閣下可通知本公司行使閣下拒絕促銷的選擇權。閣下可根據本聲明第 (4) 段所提供的聯絡方法以書面方式向本公司的個人資料保障主任提出有關要求。

(4) 查閱及改正資料權利

根據條例規定，閣下有權要求查閱及更正任何本公司所持有閣下的個人資料，請以書面經以下地址向本公司的資料保障主任提出：

藍十字（亞太）保險有限公司
香港郵政信箱 68291 號
東九龍郵政局
個人資料保障主任

根據條例，本公司有權就處理任何查閱資料要求收取合理費用。

(5) 閣下亦有權透過本聲明第 (4) 段中所提供的地址，以書面形式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運作資料，並被獲告知本公司持有的閣下之個人資料。
(6) 本聲明不會限制閣下在條例下所享有的權利。
(7) 本公司保留修改本聲明的權利。
(8) 根據中華人民共和國《個人信息保護法》而訂立的私隱附錄就本聲明進行補充，並可在以下網址下載：https://ap.bluecross.com.hk/shared/general/PIPLAddendum.pdf。如閣下正身處中國大陸，該私隱附錄將適用於閣下。

由藍十字（亞太）保險有限公司發出
(202609)

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**", "**we**", "**us**" or "**our**") 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**" and individually referred to as an "**AIA Entity**".

SmartClub is a loyalty program, encouraging you to earn great rewards through applying for insurance products. SmartClub is operated, administered, managed and distributed in Hong Kong by the Company.

In order for us to provide the SmartClub-related services to you, it will be necessary for us to collect, use and share certain personal data about you. Members and potential members expect us to maintain their information accurately, protected against manipulation and errors, secure from theft and free from unwarranted disclosure. We protect the data security of our members and potential members by complying with the Personal Data (Privacy) Ordinance (the "**Ordinance**"), and all relevant local laws, and ensure compliance by our staff with strict standards of security and confidentiality.

This Statement provides you with notice as to what personal data we will collect from you, why your personal data is collected, how it is intended to be used, to whom your personal data may be provided, from whom your personal data may be collected and how to access, review and amend your personal data.

From time to time, it is necessary for you, as an applicant for a membership under SmartClub, or as a member of SmartClub (collectively referred to as "**you**" or "**your**") to provide us with certain personal data relating to you in connection with your application for a membership and our provision of the SmartClub-related services. The provision of your personal data is voluntary: you may choose not to provide us with the requested data, but failure to do so may inhibit our ability to provide you with SmartClub-related services. During the course of your SmartClub membership, further personal data relating to you may also be collected in the ordinary course of our business.

(1) PURPOSES FOR COLLECTING PERSONAL DATA

Personal data relating to you held or collected by the Company may be used by the Company for the following purposes ("**Purposes**"):

(i) processing, administering, implementing and effecting the requests, transactions or membership services under SmartClub, and communicating with you regarding updates and future changes to SmartClub, your SmartClub membership and account, or in relation to any purposes as set out in this Statement;

(ii) personalizing, enhancing and/or developing our benefits, services and recommendations to meet your needs under SmartClub, performing functions and activities incidental to SmartClub, including, without limitation, maintenance of online and other services, identity verification, data analysis, research and statistical analysis;

(iii) providing other SmartClub and/or loyalty program-related services to you;

(iv) processing applications for insurance and financial related products and services;

(v) facilitating payment for products and/or services provided by SmartClub, or any AIA Entity, including but not limited to the verification of credit card details with credit card issuers or other third party service providers, obtaining consumer credit reports from a credit reference agency and conducting match making procedures against databases of known fraudulent transactions maintained by SmartClub, any AIA Entity or third party;

(vi) marketing services, products, advice and other subjects (subject to paragraph (3) of this Statement);

(vii) for statistical or actuarial research undertaken by us, our partners who provide goods and services under SmartClub;

(viii) 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 the Company and/or the AIA Group is expected to comply with 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;
  (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; or
  (c) any present or future contractual or other commitment with local, national 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, national or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations;

(ix) 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;

(x) enabling an actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business (or portions thereof) to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation; and

(xi) any other purposes relating to the purposes listed above.

(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, whether inside or outside of Hong Kong, to fulfil one or more of the Purposes set out in paragraph (1) of this Statement:

(i) any person authorized to act as an agent of the Company for the distribution of products and services offered by the Company;

(ii) 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 services by SmartClub;

(iii) any other person or entity under a duty of confidentiality to the Company or the AIA Group including any AIA Entity which has undertaken to keep such data confidential;

(iv) insurance companies which propose to insure the Company and its businesses, insurance companies which provide insurance cover to the Company and/or reinsurance companies with whom the Company has or proposes to have dealings;

(v) 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 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 to establish, exercise or defend or to protect legal claims, to protect the rights, property or safety of the Company or the AIA Group, or any disclosure pursuant to any contractual or other commitment of the Company or the AIA Group with local, national or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations, all of which may be within or outside Hong Kong and may be existing currently and in the future;

(vi) any actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business;

(vii) third party reward, loyalty, co-branding and privileges program providers;

(viii) co-branding partners and/or marketing partners of the Company and/or any AIA Entity (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);

(ix) 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;

(x) any persons who/which you have given instructions, authorization and consent to the Company in order to communicate with and provide information to them; and

(xi) any AIA Entity, and its officers, employees, agents, internal or external consultants, professionals and/or other advisers.

From time to time, AIA Group or the Company may purchase a business or sell one or more of the Company's business(es) (or portions thereof). In the event that AIA Group or the Company purchase(s) a business, the personal data received with that business would be treated in accordance with this Statement, if it is practicable and permissible to do so. In the event that AIA Group or the Company sell(s) a business, provisions will be included in the selling contract requiring the purchaser to treat your personal data in the same manner required by this Statement.

(3) USE AND PROVISION OF PERSONAL DATA IN DIRECT MARKETING

Subject to your consent, the Company may use your personal data we collected for direct marketing and provide your personal data to the Company's Alliance Program Partners (as defined below) for their direct marketing as described below:

(i) your name, your contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data of you collected 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, pension schemes, 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 AIA Entity (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 AIA Entity;
  (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 AIA Entity (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**"); and

(iv) in addition to marketing the above services, products, advice and subjects itself, the Company also intends to provide your personal data described in paragraph 3(i) above to all or any of the persons/ providers 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. The Company requires your written consent (which includes an indication of no objection) before we pass your personal data to Alliance Program Partners for any direct marketing purpose.

If you do not wish the Company to use or transfer your personal data we collected to our Alliance Program Partners for direct marketing, you may exercise your opt-out right by notifying the Company. To exercise your opt-out right, you may write to the 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 request access to and the correction of any of your personal data held by the Company, by writing to the Data Protection Officer of the Company at the following address:

The Data Protection Officer
Blue Cross (Asia-Pacific) Insurance Limited
P.O. Box 68291,
Kowloon East Post Office

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 to request for the Company's policies and practices in relation to personal data and to be informed of your personal data that is held by the Company by writing to the Company's Data Protection Officer at the address provided in paragraph (4) of this Statement.

(6) Nothing in this Statement shall limit your rights under the Ordinance.

(7) The Company retains the right to change this Statement.

(8) A Privacy Addendum under Personal Information Protection Law of the People's Republic of China supplements this Statement and is available at https://ap.bluecross.com.hk/shared/general/PIPLAddendum.pdf. The Privacy Addendum applies to you if you are within Mainland China.

Issued by Blue Cross (Asia-Pacific) Insurance Limited
(202609)