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

PRIVACY POLICY STATEMENT
(this "Statement")

Blue Cross (Asia-Pacific) Insurance Limited ("**Blue Cross**", "**we**", "**us**" or "**our**") is a wholly-owned subsidiary of AIA Group Limited. AIA Group Limited and/or its subsidiaries ("**AIA Group**" and individually referred to as an "**AIA Entity**") recognise our responsibilities in relation to the collection, use, disclosure and other processing and storage of personal data.

Among the most important assets of AIA Group is the trust and confidence placed to properly handle information. Customers and potential customers expect us to maintain their information accurately, protected against manipulation and errors, secure from theft and free from unwarranted disclosure. We protect data security of our customers and potential customers by complying with all relevant data protection laws and regulations, and ensure compliance by our staff with strict standards of security and confidentiality.

This Statement provides you with notice as to how and why your personal data is collected, how it is intended to be used, to whom your personal data may be transferred to, how to access, review and amend your personal data, and our policies on direct marketing and the use of cookies. By using this website, you are accepting the practices and policies in this Statement. If you object to any practices and policies in this Statement, please do not provide your personal information to Blue Cross.

This website is for general information purpose only. While we use reasonable efforts to ensure the accuracy of the information on this website, Blue Cross does not warrant its absolute accuracy or accept any liability for any loss or damage resulting from any inaccuracy or omission. Without prior permission from Blue Cross, no information contained on this website may be copied, except for personal use, or redistributed.

Blue Cross recognises its responsibilities in relation to the collection, holding, processing or use of personal data. 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 information and services to you or to respond to your enquiries. Blue Cross will not collect any information that identifies you personally through this website unless and until you use and browse the website, buy our products or services, register as a member, interact with us, sign-up to receive news about our products and services, or otherwise communicate with us (including where requesting technical support).

This website, our apps, and our social media platforms are not intended for persons in jurisdictions that restrict the distribution of information by us or use of such website or social media platforms. If this is applicable to you, we would advise you to make yourself familiar with and observe the relevant restrictions, and Blue Cross does not accept liability in this respect.

How do we collect personal data?

We will collect and store your personal data in the following circumstances:

- directly when you provide such information to us (for example, when you send us enquiries or communications);
- when you access, interact and use our services, website, apps or social media platforms;
- to the extent permitted by law, when we obtain information about you from our affiliated entities, business partners and other independent third parties' sources; and
- where you have provided it to us through any other means.

The personal data we collect (which includes sensitive personal data as defined under relevant applicable laws and regulations), includes the following:

(i) **Profile information** - including name, address, occupation, contact details, date of birth, nationality, health-related information, identity card number, passport numbers and place and date of issue thereof;

(ii) **Employment related information** - including current employer, nature of position, medical benefits and benefit usage information;
(iii) **Medical Data** – including medical history, investigation findings, treatments and prescriptions;
(iv) **Reference on health condition** - including information obtained from a medical professional for a reference on the health condition of customers;
(v) **Technical information** - including IP address, browser type and version, time zone settings, browser plugin types, operating systems and platform, device information (including where mobile device the IMEI number, wireless networks and general network information); and
(vi) **Information which is in the public domain**.

If you make use of any social media features or platforms, either on our website, an application we provide, or otherwise through a social media provider, we may access and collect information about you via that social media provider in accordance with their policies. When using a social media feature, we may access and collect information you have chosen to make available and to include in your social media profile or account, including but not limited to your name, gender, birthday, email address, address, location etc. Our access to this information may be limited or blocked based on your privacy settings with the relevant social media provider.

We will usually identify any information which is mandatory when we collect the information from you. You may choose not to provide us with the requested data, but failure to do so may inhibit our ability to do business with you or to respond to your enquiries.

Why do we collect your personal data and how may it be used by us?

Personal data is collected by us for the following purposes or any of them ("**Purposes**"):

- to provide you with access to the content on the website, apps or social media platforms;
- to process and administer your account, to implement and effect the requests or transactions contemplated by the forms available on our website, apps or any other documents you may submit to us from time to time;
- to design new or enhance existing products, information and services provided by us;
- to communicate with you including to send you administrative and technical communications about any account you may have with us, to provide technical support or notify about future changes to this Statement;
- for statistical or actuarial research undertaken by Blue Cross, the financial services industry or our respective regulators;
- for data analysis, business and administrative purposes;
- to monitor your use of the website, apps and social media platforms and conduct analysis of the use of the website and/or apps in order to operate, evaluate and improve the website, apps, and our services, understand your preferences and troubleshoot any problems;
- to assist in law enforcement purposes, investigations by police or other government or regulatory authorities and to meet requirements imposed by applicable laws and regulations or other obligations committed to government or regulatory authorities;
- to personalise the appearance of our websites, provide recommendations of relevant products, information and services and provide targeted advertising on our website or through other channels;
- other purposes as notified at the time of collection; and
- other purposes directly relating to any of the above.

Unless permitted by applicable laws and regulations, we will obtain consent from you if we wish to use your personal data for purposes other than those stated in this Statement.

Blue Cross may retain your information for as long as necessary to fulfil the purpose(s) for which it is collected or as otherwise required to ensure compliance with applicable laws and regulations. Blue Cross applies reasonable security measures to prevent unauthorised or accidental access, processing, erasure, loss or use including limiting physical access to data within Blue Cross' systems and encryption of sensitive data when transferring such data.

Reasonable steps will be taken to delete or destroy the information when it is no longer necessary for any of the purpose above.

For our policy on use of your personal data for promotional or marketing purposes, please see the section entitled "Use and Provision of Personal Data in Direct Marketing".

Who may be provided with your personal data?

Personal data held by us relating to you will be kept confidential but we may provide such data to the following parties, whether inside or outside of Hong Kong, to fulfil the purposes set out above in this paragraph of this Statement:

- any person authorized to act as our agent for the distribution of products and services offered by us;
- any agent, contractor or third party service provider who provides services to us in connection with the operation of our 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 us (such as insurance adjusters, claim investigators, debt collection agencies, data processing companies and professional advisors);
- any other person or entity under a duty of confidentiality to us or the AIA Group including any AIA Entity which has undertaken to keep such data confidential;
- insurance companies which propose to insure us and our businesses, insurance companies which provide insurance cover to us and/or reinsurance companies with whom we have or propose to have dealings;
- any person or entity to whom we 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 us or the AIA Group or with which we 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 us or the AIA Group, or any disclosure pursuant to any contractual or other commitment of us 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;
- any actual or proposed assignee, transferee, participant or sub-participant of our rights or business;
- third party reward, loyalty, co-branding and privileges program providers;
- co-branding partners and/or marketing partners of Blue Cross 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);
- 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 we engage for the purposes set out in this Statement;
- the following persons who carry out any of the purposes described in this Statement: insurance adjusters, agents and brokers, employers, health care professionals, hospitals, accountants, financial advisors, solicitors, organisations that consolidate claims and underwriting information for the insurance industry, fraud prevention organisations, other insurance companies (whether directly or through fraud prevention organisation or other persons named in this paragraph), the police and databases or registers (and their operators) used by the insurance industry to analyse and check information provided against existing information;
- any persons who/which you have given instructions, authorization and consent to us in order to communicate with and provide information to them; and
- any AIA Entity, and its officers, employees, agents, internal or external consultants, professionals and/or other advisers.

Unless permitted by applicable laws and regulations, we will obtain consent from you if we wish to transfer your personal data to other entity(ies) other than those stated in this Statement.

From time to time, AIA Group or we may purchase a business or sell one or more of our business(es) (or portions thereof). In the event that AIA Group or we 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 we 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.

Your personal data may be provided to any of the above persons who may be located in other jurisdictions or territories to that in which you are located. Your information may be transferred to, stored, and processed in other jurisdictions where we and/or any AIA Entity is located, or jurisdictions where a third-party contractor is located or from which the third-party contractor provides us services. Where required under relevant law, we may seek your consent to the transfer of such information outside your jurisdiction to our facilities or to those third parties with whom we share it as described above. Your personal data will only be transferred to other locations, where we are satisfied that adequate levels of protection exist to protect the integrity and security of your personal data, which as a minimum are comparable to the jurisdiction or territory in which you provided such personal data.

Access and Correction Rights to Personal Data

Under the applicable laws and regulations, you have the right to request access to and the correction of any of your personal data held by us, by writing to our Data Protection Officer at the following address:

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

Under applicable laws and regulations, we have the right to charge a reasonable fee for the processing of any data access request.

You also have the right to request for our policies and practices in relation to personal data and to be informed of your personal data that is held by us by writing to our Data Protection Officer at the address above.

Use and Provision of Personal Data in Direct Marketing

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

1. your name, your contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data of you collected by us from time to time may be used by us in direct marketing;

2. 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 co-branding partners and/or marketing partners of Blue Cross 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;

3. the above services, products, advice and subjects may be provided by us 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 us 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**").

4. in addition to marketing the above services, products, advice and subjects itself, we also intend to provide your personal data described above to all or any of the Alliance Program Partners for use by them in marketing those services, products, advice and subjects described above by contacting you, and we require 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 us to use or transfer your personal data we collected to the Alliance Program Partners for direct marketing, you may exercise your opt-out right by notifying us. To exercise your opt-out right, you may write to our Data Protection Officer at the address provided in this Statement, or provide us with your opt-out choice in the relevant application form (if applicable).

Use of Artificial Intelligence

Artificial Intelligence ("**AI**") is a technology to simulate the human thought process to perceive, understand, reason and solve problems to augment, improve, or replace human decisions.

While we carry out our business, we may use AI to process your personal data to fulfil the Purposes. Common examples for using AI include:-

(i) Customer interaction – natural language processing that converts voice to text and conducts appropriate interaction with customers;
(ii) Digital onboarding and servicing processes – application and servicing processes using optical character recognition tool that recognizes text within digital images and validates the accuracy of form contents filled out against the supporting documents; and
(iii) Product and portfolio recommendation – AI is used to conduct big data analysis based on our customer database and enables us to understand the needs of our customers.

Use of Cookies

Cookies are small text containing small amounts of information which are downloaded and may be stored on any of your web browsers or internet enabled devices (e.g. your computer, smartphone or tablet) that can later be read by the server - like a memory for a web page.

Blue Cross may use cookies and other tools on the website. By continuing to use the website, you are agreeing to us placing cookies on your computer. The information collected (including but not limited to: your IP addresses (and domain names), browser software, types and configurations of your browser, language settings, geo-locations, operating systems, referring website, pages and content viewed, and durations of visit) will be used to ensure operation of the website and enable you to log in securely, for compiling aggregate statistics on how our visitors reach and browse our websites for web enhancement and optimisation purposes, and to help us understand how we can improve your experience on it.

The cookies also enable our website to remember you and your preferences, and tailor the website for your needs. Advertising cookies will allow us to provide advertisements on our websites that are as relevant to you as possible, e.g. by selecting interest-based advertisements for you, or preventing the same advisement from constantly reappearing to you. You can find more information on the types of cookies we collect, what we use these for, and how to manage your cookie settings in our Cookie Policy.

External links

If any part of this website contains links to other websites, those sites may not operate under this Statement. You are advised to check the privacy statements on those websites to understand their policies on the collection, usage, transferal and disclosure of personal data.

Amendments to this Statement

Blue Cross reserves the right, at any time and without notice, to add to, change, update or modify this Statement, simply by notifying you of such change, update or modification. If we decide to change our personal data policy, those changes will be notified on our website so that you are always aware of what information we collect, how we use the information and under what circumstances the information is disclosed. Any such change, update or modification will be effective immediately upon posting. Where required by applicable law, we may also notify you in the event of material changes to this Statement and, where required, seek your consent to those changes.

Additional Information

Should you have any questions on any part of this Statement or would like additional information regarding Blue Cross' data privacy practices please do not hesitate to contact us by the contact details above.

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