

## **Privacy Policy Statement**

AIA Group Limited and/or its subsidiaries (“**AIA Group**”, “**AIA**”, “**we**”, “**us**”, “**our**”) 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 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 the 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 policy(ies) on direct marketing. You may be asked to consent to the practices and policies in this statement when you access, or interact with us via, this WorkWell App. Otherwise, by using this WorkWell App, you are accepting the practices and policies in this statement. If you object to any practices and policies in this statement, please do not use this WorkWell App to submit your personal information to AIA.

This WorkWell App is for general information purpose only. While we use reasonable efforts to ensure the accuracy of the information on this WorkWell App, AIA 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 AIA, no information contained on this WorkWell App may be copied, except for personal use, or redistributed.

AIA 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. AIA will not collect any information that identifies you personally through this WorkWell App unless and until you use and browse the WorkWell App, 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 WorkWell App, and our social media platforms are not intended for persons in jurisdictions that restrict the distribution of information by us or use of such WorkWell App 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 AIA does not accept liability in this respect.

### **How we collect data.**

We will collect and store your personal data either:

- directly when you provide such information to us (for example, when you send us enquiries or communications);
- indirectly through your use of our websites, apps or social media platforms; or
- where you have provided it to us through any other means.

We may obtain lawfully collected personal or non-personal data about you from affiliated entities, business partners and other independent third parties' sources. We may also collect some information about your computer or other devices used when you visit this WorkWell App, apps or social media platforms.

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

- identity information – name, address, personal contact details (including email address and telephone numbers); and
- technical information – such as 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).

If you make use of any social media features or platforms, either on our website, an application we provide including this WorkWell App, 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 (i.e. information required for creating an account, and to enable you to access the features of the WorkWell App and receive any services) 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 we collect your personal data and how it may be used?**

Personal data is collected for the following purposes:

- to provide you with access to the content on the WorkWell App 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 WorkWell App 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 AIA, the financial services industry or our respective regulators;
- for advances data analytics, data matching, internal business and administrative purposes;
- to monitor your use of the WorkWell App, apps and social media platforms and conduct analysis of the use of the WorkWell App in order to operate, evaluate and improve the WorkWell App 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 WorkWell App, provide recommendations of relevant products, information and services and provide targeted advertising on our WorkWell App 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.

AIA may retain your information for as long as necessary to fulfill the purpose(s) for which it is collected or as otherwise required to ensure compliance with applicable laws and regulations. AIA applies reasonable security measures to prevent unauthorised or accidental access, processing, erasure, loss or use including limiting physical access to data within AIA's 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 of Personal Data for Direct Marketing Purposes".

Who may be provided with your personal data?

Personal data will be kept confidential but may, where permitted by law or where such disclosure is necessary to satisfy the purpose or a directly related purpose for which the personal data was collected, provide such personal data to the following parties:

- any person authorised to act as an agent of AIA in relation to the distribution of products and services offered by AIA;
- any agent, contractor or third-party service provider (within or outside AIA) who provides administration, data processing, telecommunications, computer, payment, debt collection or securities clearing, technology outsourcing, call

centre services, mailing and printing services in connection with the operation of AIA's business and AIA's provision of services to you;

- any member company of AIA Group Limited in relation to the provision or marketing of insurance services;
- any agent, contractor or third-party service provider (within or outside AIA) including companies that help deliver our services, such as reinsurance companies, investment management companies, claims investigation companies, industry associations or federations;
- other companies that help gather your information or communicate with you, such as research companies and ratings agencies, in order to enhance the services we provide to you; and
- government or regulatory bodies in any jurisdiction or any person to whom an AIA company must disclose data: (a) under a legal and/or regulatory obligation in that or any other jurisdiction applicable to that particular AIA company; or (b) pursuant to an agreement between the AIA company and the relevant government, regulatory body or other person.

For our policy on sharing of your personal data for promotional and marketing purposes, please see the section entitled "**Use of Personal Data for Direct Marketing Purposes**".

From time to time, we may purchase a business or sell one or more of our businesses (or portions thereof) and your personal data may be transferred or disclosed as a part of the purchase or sale or a proposed purchase or sale. In the event that we purchase 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.

**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 any AIA Group 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 Rights to Personal Data

Under applicable laws and regulations, you may have the right to:

- verify whether AIA holds any personal data about you and to access any such data or information about how AIA used or disclosed your personal data;
- require AIA to correct any personal data relating to you which is inaccurate;

- request deletion of your personal data under certain circumstances;
- withdraw your consent or request a change to your scope of consent;
- request deregistration or deletion of your registered account;
- make a complaint about AIA's data handling; and
- enquire about AIA's policies and practices in relation to personal data.

Requests for access, correction, complaints, or other queries relating to your personal data should be addressed to:

The Data Protection Officer  
Group Compliance  
AIA Group  
27/F, Hopewell Centre  
183 Queen's Road East  
Wanchai, Hong Kong.

Or email to: [privacy.compliance@aia.com](mailto:privacy.compliance@aia.com)

Under applicable laws and regulations, AIA has the right to charge costs which are directly related to and necessary for the processing of any personal data request.

You also have the right to lodge a complaint with a supervisory authority in certain jurisdictions if you consider that the processing of your personal data infringes applicable law.

#### Use of Personal Data for Direct Marketing purposes

In addition to the purposes set out above, where permitted by law, AIA may use your name and contact details for promotional or marketing purposes including sending you promotional materials and conducting direct marketing in relation to the following products, services, advice and subjects: insurance; annuities; Mandatory Provident Fund/Occupational Retirement Schemes Ordinance Fund wealth management; investment; banking; financial services; credit cards; medical/health treatment; educational; recruitment; training; reward/loyalty/privilege programmes; charitable/non-profitable causes ("**Classes of Marketing Subjects**").

For the purposes of direct marketing, we may, where permitted by law, provide your personal information to providers (whether within or outside of AIA) of any of the Classes of Marketing Subjects described above and call centre, marketing or research services so that they can send you promotional materials and conduct direct marketing in relation to the products and services they offer (these materials may be sent to you by postal mail, email or other means). Where permitted by law, we may provide your personal data to providers (whether within or outside of AIA) of any of the Classes of Marketing Subjects for gain.

Before using or providing your personal data for the purposes and to the transferees set out in this section, we may be required by law to obtain your written consent, and in such cases, only after having obtained such written consent, may we use and provide your personal data for any promotional or marketing purpose.

The types of personal data that AIA would use and provide for direct marketing purposes as described above are your name and relevant contact details, although we may possess additional personal data.

If your consent is required, and you provide such consent, you may thereafter withdraw your consent to the use and provision to a third party by AIA of your personal data for direct marketing purposes and thereafter AIA shall cease to use or provide such data for direct marketing purposes.

If you have provided consent and wish to withdraw it or if you prefer not to receive marketing communications from us in any form, please inform us by writing to the address in the section on "Access Rights to Personal Data" or sending us an email to [privacy.compliance@aia.com](mailto:privacy.compliance@aia.com). Any such request should clearly state details of the personal data in respect of which the request is being made.

### External Links

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

### Amendments to this Statement

AIA 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 WorkWell App 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 AIA's data privacy practices please do not hesitate to contact us by the contact details above.

### **私隱政策聲明**

友邦保險控股有限公司及／或其附屬公司（「友邦集團」、「友邦保險」、「我們」、「我們的」）明瞭我們與個人資料的收集、使用、披露及其他處理與儲存相關的責任。

友邦保險其中一項最重要的資產，就是對我們能妥善處理資料而給予的信任及信賴。客戶與潛在客戶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。我們遵行所有相關資料保護法律及法規，以期為客戶及潛在客戶的資料提供安全保障，並確保員工遵守嚴格保安及保密標準。

本聲明旨在向閣下通知收集閣下個人資料的方式及原因、資料的擬定用途、可能獲轉移閣下個人資料的有關方、有關查閱、檢視及修訂閣下個人資料的方法，以及我們直接促銷的政策。閣下通過WorkWell App查閱本聲明或與我們互動時，可能會被請求對本聲明所述慣例及政策表示同意；否則，使用WorkWell App即表示閣下接受本聲明的慣例及政策。若閣下反對本聲明的任何慣例及政策，請不要使用WorkWell App提交個人資料予友邦保險。

WorkWell App只為提供一般資料而設。雖然我們已盡合理努力，確保WorkWell App的資料準確，友邦保險概不保證資料絕對準確，亦概不為資料不準確或由任何錯漏所產生的任何損失或損害而承擔任何責任。如未得友邦保險事前准許，不得複製（作為私人用途例外）或轉發WorkWell App所載的任何資料。

友邦保險確認其就收集、保存、處理或使用個人資料需負上的責任。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的個人資料，惟這樣可能導致我們不能為閣下提供資料及服務或回應閣下的查詢。友邦保險不會透過WorkWell App收集任何可識別閣下身份的資料，除非直至閣下使用並瀏覽WorkWell App、購買我們的產品或服務、登記成為會員、與我們互動、訂閱有關我們的產品及服務的資訊，或以其他方式與我們通訊（包括請求技術支援）起為止。

WorkWell App及我們的社交媒體平台不擬供身處限制我們分發資料或使用WorkWell App或社交媒體平台的司法管轄區內的人士使用。若此規定適用於閣下，我們建議閣下自行了解及遵從有關限制，友邦保險概不因此而承擔任何責任。

## 收集資料的方法

我們將如下收集及儲存閣下的個人資料：

- 在閣下向我們提供有關資料時（如閣下向我們提出查詢或與我們通訊時）直接收集；

- 通過閣下對本網站、應用程式或社交媒體平台的使用間接收集；或
- 在閣下通過任何其他方法向我們提供資料時收集。

我們會從聯屬實體、商業夥伴及其他獨立第三方資料來源，獲取與閣下有關並合法收集的個人或非個人資料。在閣下到訪WorkWell App、應用程式或社交媒體平台時，我們亦收集與閣下所用的電腦或其他裝置有關的某些資料。

我們收集的個人資料（包括在相關適用法律及法規下定義的敏感個人資料），包括以下各項：

- 身份資料——姓名、地址、個人聯絡資料（包括電郵地址及電話號碼）；及
- 技術資料——包括如IP地址、瀏覽器類型及版本、時區設定、瀏覽器外掛程式類型、操作系統及平台、裝置資料（包括流動裝置的IMEI碼、無線網絡及一般網絡資料）。

若閣下在WorkWell App、我們所提供的應用程式或通過社交媒體供應商使用任何社交媒體功能或平台，我們可能通過有關社交媒體供應商，按照其有關政策查閱及收集與閣下有關的資料。在使用社交媒體功能時，我們可能會查閱及收集閣下於閣下的社交媒體個人簡述或賬戶選擇提供並列入在內的資料，有關資料包括（但不限於）閣下的姓名、性別、出生日期、電郵地址、地址、位置等。根據閣下在有關社交媒體供應商所作的私隱設定，將可限制或封鎖我們對有關資料的查閱。

我們在從閣下收集資料時一般會標明屬必須提供的任何資料（即建立賬戶所需以及使您能夠使用WorkWell App功能及獲取任何服務的資料）。閣下可選擇不向我們提供所需的個人資料，惟這樣可能導致我們不能與閣下進行業務或回應閣下的查詢。

### **收集閣下個人資料的原因及擬定用途**

收集個人資料乃作以下用途：

- 以讓閣下查閱WorkWell App、應用程式或社交媒體平台上的內容；
- 處理和管理閣下的賬戶；執行和實行在WorkWell App上所提供的表格中或閣下可能不時呈交予我們的任何其他文件項下的要求或交易；
- 設計全新或加強現時我們所提供的產品、資料及服務；
- 與閣下保持聯繫，包括向閣下寄發有關閣下在我們公司的任何賬戶的管理及技術通訊、提供技術支援或有關本聲明日後變動的通知；
- 供友邦保險、金融服務業或我們的相關監管機構的統計或精算研究之用；



- 供我們作進階數據分析、資料配對，內部業務及行政之用；
- 監察閣下使用WorkWell App、應用程式及社交媒體平台的情況，以及對WorkWell App的使用情況進行分析，以運作、評估及改進WorkWell App及我們的服務、了解閣下的偏好及解決任何問題；
- 協助執行法例、警方或其他政府或監管機構調查，以及遵守適用法律及法規所施行的規定，或其他向政府或監管機構承諾之義務；
- 將WorkWell App的外觀個人化，提供相關產品、資料及服務的建議，以及在WorkWell App或通過其他渠道進行目標廣告活動；
- 在收集之時所通知的其他用途；及
- 與上述任何項目直接有關的其他用途。

除非適用法律及法規准許，否則如我們有意將閣下的個人資料用於本聲明所述用途以外的其他用途，我們將取得閣下的同意。

友邦保險將可因應履行收集資料的用途所需或按確保遵守適用法律及法規所規定的其他期限留存資料。友邦保險採用合理保安措施，包括限制親身查閱友邦保險系統內的數據及在轉移敏感數據時進行加密處理，以防止未經授權或意外的查閱、處理、刪除、丟失或使用的情况。若不再需要用作上述任何用途，將會採取合理步驟刪除或銷毀有關資料。

有關我們使用閣下的個人資料作宣傳或市場推廣用途的政策，請參閱 **使用個人資料作直接促銷用途**」一節。

### 誰會取得閣下的個人資料？

個人資料將保密處理，惟倘法律許可或就符合履行收集個人資料用途或直接相關用途而披露屬必須時，則可向以下各方提供相關個人資料：

- 獲授權擔任友邦保險代理且與分銷友邦保險所提供之產品及服務有關的任何人士；
- 就友邦保險營運以及友邦保險向閣下提供服務相關而提供管理、數據處理、電訊、電腦、付款、收債或證券結算、技術外判、電話中心服務、郵寄及印刷服務的任何代理、承包商或第三方服務供應商；
- 與提供或促銷保險服務有關的友邦保險控股有限公司任何成員公司；
- 任何代理、承包商或第三方服務供應商（無論在友邦保險內或外），包括協助提供服務的公司，例如再保險公司、投資管理公司、索賠調查公司、業界協會或聯盟；

- 協助收集閣下資料或與閣下聯繫的其他公司，例如研究調查公司及信貸評級機構，藉以加強我們向閣下所提供的服務；及
- 在任何司法管轄區的政府或監管機構或友邦保險公司：(a)根據在該或任何其他司法管轄區適用於該友邦保險公司的法律及／或監管義務而必須對其披露的任何人士；或(b)依據該友邦保險公司與相關政府、監管機構或其他人士協議必須對其披露的任何人士。

有關我們共享閣下的個人資料作宣傳及市場推廣用途的政策，請參閱 **使用個人資料作直接促銷用途**」一節。

我們可不時購買業務或出售我們一項或多項業務（或其部分），而閣下的個人資料可作為該買賣或建議買賣的一部分予以轉讓或披露。倘我們購買一項業務，就該業務所獲得的個人資料將在其可行及允許的情況下根據本聲明處理。

**閣下的個人資料可被提供予上述任何人士，有關人士可位於閣下所在以外的其他司法管轄區或地區。**閣下的資料，將可轉移往任何友邦保險公司所在的司法管轄區，或第三方承包商所在的司法管轄區或第三方承包商為我們提供服務的地方的司法管轄區，並在有關司法管轄區儲存及處理。若相關法律有所要求，我們將尋求閣下同意以將有關資料從閣下的司法管轄區轉移至我們在其之外的設施，或如上文所載轉移至我們與其分享有關資料的第三方。閣下的個人資料將僅會被轉移到我們確信保護水平足以保護閣下的個人資料完整及安全的其他地區，有關地區的保護水平至少須與閣下提供此等個人資料的司法管轄區或地區的水平相約。

### 查閱個人資料的權利

根據適用法律及法規，閣下或可有權：

- 核實友邦保險是否持有閣下的個人資料，並查閱任何該等資料或友邦保險如何使用或披露該等資料的資訊；
- 要求友邦保險更正任何有關閣下的錯誤個人資料；
- 在若干情況下，要求刪除閣下的個人資料；
- 撤銷閣下的同意或要求變更同意的範圍；
- 要求註銷或刪除閣下已註冊的賬戶；
- 對友邦保險的資料處理提出投訴；及
- 就友邦保險有關個人資料的政策及慣例作出查詢。

如欲查閱或更正閣下的個人資料，或提出相關的投訴或其他查詢，可致函至以下地址

香港灣仔皇后大道東183號  
合和中心27樓  
友邦保險控股有限公司  
集團合規部  
資料保護主任

或發送電郵至: [privacy.compliance@aia.com](mailto:privacy.compliance@aia.com)

根據適用法律及規例，友邦保險有權就因處理任何有關個人資料的要求收取直接相關及必要的費用。

在若干司法管轄區，如閣下認為處理閣下的個人資料的方式違反適用法律，閣下亦有權向監管機關投訴。

### **使用個人資料作直接促銷用途**

除上述用途外，在法律許可的情況下，友邦保險可使用閣下的姓名和聯絡資料作宣傳或市場推廣用途，包括向閣下寄發宣傳資料及就以下產品、服務、建議及目的作直接促銷：保險；年金；強制性公積金／職業退休計劃；財富管理；投資；銀行；金融服務；信用卡；醫療／健康治療；教育；招聘；訓練；獎賞／年資獎勵／優惠計劃；慈善／非牟利用途（「**促銷標的類別**」）。

鑒於直接促銷的用途，在法律許可的情況下，我們或會將閣下的個人資料提供予以上描述的任何促銷標的類別、電話中心、市場推廣或研究服務的提供商（無論在友邦保險內或外），從而使他們可就其所提供產品及服務向閣下寄發宣傳資料及進行直接促銷（有關資料可透過郵寄、電郵或其他方式送達予閣下）。在法律許可的情況下，我們或會將閣下的個人資料提供予任何以上描述的促銷標的類別的提供商（無論在友邦保險內或外）而得益。

就本節用途使用或向本節受讓方提供閣下的個人資料前，我們可能受法律所規定要取得閣下的書面同意，且在該等情況下，僅會在取得有關書面同意後方就任何宣傳或市場推廣用途使用或提供閣下的個人資料。

儘管我們可能管有其他個人資料，但友邦保險會使用及提供作以上描述的直接促銷用途的個人資料為閣下的姓名和相關聯絡資料。

如要求閣下同意，而閣下有給予該等同意，閣下可於其後撤回對友邦保險使用並向第三者提供閣下的個人資料作直接促銷用途的同意；此後，友邦保險須停止使用或提供該等資料作直接促銷之用。

如閣下已給予同意但又欲將其撤回，或如閣下不希望收到我們發出的任何形式的市場推廣通訊，請以書面或電郵方式通知我們，書面通知可郵寄至「查閱個人資料的權利」

一節所載地址，而電郵可發送至 [privacy.compliance@aia.com](mailto:privacy.compliance@aia.com)。任何有關請求應清楚列明該要求相關的個人資料詳情。

## **外部連結**

若WorkWell App任何部分載有連接其他網站的連結，有關網站可能並非根據本聲明運作。現建議閣下查閱有關WorkWell App的私隱政策，藉以瞭解其收集、使用、轉移及披露個人資料的政策。

## **本私隱政策聲明的修訂**

友邦保險保留權利可隨時且在無須通知的情況下僅憑知會閣下有關修改、更新或修訂，而增添、修改、更新或修訂本聲明。倘我們決定修改我們的私隱政策聲明，我們將於我們的WorkWell App知會閣下有關修改，從而讓閣下能得悉我們所收集的資料、我們如何使用該資料及在何種情況下會披露該資料。任何有關修改、更新或修訂將在刊登後即時生效。若適用法律有所要求，我們亦會在本聲明發生重大修改時通知閣下，並（如有需要）尋求閣下同意有關修改。

## **其他資料**

如閣下對本聲明的任何部分有任何疑問，或如欲知悉有關友邦保險的資料保密慣例的更多資料，請隨時循上述聯絡途徑與我們聯絡。