

Privacy Policy

General

1. Pacific Prime Insurance Brokers Singapore Pte Ltd (Singapore registration no.: 200601398C) (**Pacific Prime CXA**) and its affiliates and group companies are committed to personal data protection and will continually strive to protect personal data in accordance with applicable laws, including the Singapore Personal Data Protection Act (**PDPA**), the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486), the Malaysia Personal Data Protection Act 2010, and best industry standards. By dealing with Pacific Prime CXA in any way, whether as a supplier, user, distributor or in any other capacity, you agree to this Privacy Policy.
2. A reference to **Pacific Prime CXA** in this Privacy Policy and consent given by you in the Pacific Prime CXA Portal includes a reference to Pacific Prime Insurance Brokers Singapore Pte Ltd (Singapore registration no.:200601398C) and its other affiliates and group companies from time to time. The use of including in all its grammatical forms is construed without limitation. **Personal data** includes any information that identifies or locates an individual or is capable of doing so.

Collection and Use of Personal Data

3. If you provide personal data of a third party (including information of your family members) to us, you represent and warrant that the consent of such third party has been obtained for the purposes stated in this Privacy Policy.
4. The main types of personal data that Pacific Prime CXA collects and deals with are names, email addresses, contact numbers, national ID numbers, lab results and health risk assessment information, claims and benefits information, credit card information and delivery addresses. Pacific Prime CXA does not collect or store medical records other than as specified herein.

5. Pacific Prime CXA obtains and uses personal data for (a) designing, developing and offering employee benefits, employee benefits and wellness products, services and solutions (Key Businesses), (b) owning, operating and providing online services, eCommerce market places, support and other services related to the **Key Businesses**, (c) obtaining, analysing and dealing with data and other information (including those relating to Key Businesses), (d) distribution of its Key Businesses, insurances and related services, and (e) providing consultancy or advisory services on Key Businesses.
6. Pacific Prime CXA may use personal data for correspondence related to claims, underwriting, benefits administration and related transactions (**Permitted Communications**).
7. Pacific Prime CXA may use personal data to supervise, administer, assist with or otherwise manage the transactions on Pacific Prime CXA's online or eCommerce services. In exceptional cases, including to prevent fraud, mitigate losses and respond to requests or complaints, Pacific Prime CXA may use personal data to intervene in transactions on Pacific Prime CXA's online or eCommerce services. For example, Pacific Prime CXA may use personal data to enforce refunds.
8. Pacific Prime CXA may, either by itself or by working with or through collaborative partners, use personal data for research and data analytics to provide targeted services and/or for research purposes.
9. Pacific Prime CXA stores personal data, regardless of its form, with security appropriate to the sensitivity of the personal data. Pacific Prime CXA retains personal data for the duration that is set out in its prevailing record retention policy (presently up to 7 years), which complies with and is consistent with applicable laws and Pacific Prime CXA's reasonable business requirements. Where Pacific Prime CXA obtains employee personal data from an employer, Pacific Prime CXA may continue to retain that employee's data for the retention period described under this clause, even if the applicable employment is terminated.

Disclosures

10. Pacific Prime CXA does not sell, rent, license or otherwise deal with personal data for cash consideration or as inventory or stock-in-trade.

11. Pacific Prime CXA discloses personal data to third parties where the disclosure is required for Pacific Prime CXA's ordinary course of business or in connection with the uses set out in this Privacy Policy, mainly:
 - a. Pacific Prime CXA discloses personal data to its agents, subcontractors, service providers, suppliers, insurers, collaborative partners and professional advisors;
 - b. where Pacific Prime CXA's online services and electronic marketplaces are used, Pacific Prime CXA discloses personal data to credit card processors, payment gateways (presently Stripe), delivery services and other service providers that perform, facilitate or support the applicable payment, delivery or other services; and
 - c. Where Pacific Prime CXA's online services and electronic marketplaces are used, Pacific Prime CXA discloses to the supplier or service provider the personal data of users or purchasers for purposes that are related to the relevant transactions, including delivery, consumer inquiries, payments and refunds; and such recipients are contractually restricted from using or disclosing personal data except as agreed with Pacific Prime CXA or to comply with legal requirements. Such recipients are contractually bound to maintain the confidentiality of personal data and may not use the personal data for any unauthorized purposes.

12. Pacific Prime CXA discloses anonymized and aggregated personal data to clients, and strategic, specialist and other partners, for analysis, processing, computation and other similar activities, for Pacific Prime CXA's Key Businesses, product development and research.

13. When Pacific Prime CXA discloses personal data to third parties, the third-party recipients (other than natural person consumers) are required to protect personal data with

substantially the same or higher standards as those stated in this policy.

14. Pacific Prime CXA may provide personal data with or without consent in emergencies or legal processes, including:

- a. where requested by governmental agencies, subpoenas or court orders;
- b. for inquiries related to insurance or employment; and
- c. where necessary to ensure health and safety.

15. The log-in activity data retained by Pacific Prime CXA may include information such as the operating system, device, and type of browser used by you. This information may be used for system troubleshooting and statistical analytics about our users' browsing actions and patterns.

Cookies

16. Pacific Prime CXA may store cookies in your browser to identify and associate activity with it. The activity data may be combined with other information, including your IP address, operating system and type of browser, for system administration and to create statistical reports. This is statistical data about our users' browsing actions and patterns.

Third Party Sites

17. When using Pacific Prime CXA services you may be provided with links to third-party sites and services. Using the links will lead you to those other sites and services with their own privacy policies or data protection practices that are different from this Privacy Policy. Pacific Prime CXA is not responsible for the privacy or data protection practices of websites operated by third parties that are linked to our website and how it affects you.

Transfer outside Singapore

18. Before Pacific Prime CXA transfers personal data to a territory outside of your country of residence including for business continuity planning and/or disaster recovery planning, Pacific Prime CXA shall take appropriate steps to ensure that any transfers of personal data to the territory will be in accordance with the applicable data protection law so as to ensure a standard of protection to personal data transferred that is comparable to the protection under that data protection law.

Changes

19. Pacific Prime CXA may amend this Privacy Policy at any time, by publishing and posting the revised privacy policy on the Pacific Prime CXA platform. Your continued access or use of the Pacific Prime CXA platform and services constitutes your acceptance of the Privacy Policy posted. Pacific Prime CXA encourages you to periodically review this Privacy Policy so that you will be aware of Pacific Prime CXA's privacy practices.

Do-Not-Call Registries

20. The consents for Pacific Prime CXA to collect, keep and use personal data (including for the Permitted Communications) given under this Privacy Policy apply even if the relevant mobile numbers, contact or other personal data are listed with the Singapore Do-Not-Call registry (or any other similar registries or services), and override the DNC or similar listings. These consents apply to all dealings with Pacific Prime CXA, including those through mobile apps, Internet portals and any other electronic systems or properties.

Contacting Us

21. For (a) questions or feedback about how we are handling your personal data, or any complaint about such matters, (b) withdrawal of consents, or (c) accessing or correction of personal data, please contact:

With respect to Pacific Prime CXA Singapore

Cross Street Exchange, #09-02
18 Cross Street
Singapore 048423

With respect to Pacific Prime CXA Hong Kong

Units 7-11, 35th Floor
1 Hung To Road, Kwun Tong
Hong Kong

22. As Pacific Prime CXA relies on your personal data to provide products and services to you, you shall ensure that at all times the personal data provided by you to us is correct, true, accurate and complete. You shall update us promptly on all changes to the information given to us.

23. For personal data from a third party (including your employer or doctor) received by Pacific Prime CXA, please contact that third party to access or correct personal data.

24. If you withdraw your consent related to the use of your personal data, Pacific Prime CXA may not be able to provide you with its products or services or otherwise serve you on the administration of your benefits. It may also result in the termination of your agreements with Pacific Prime CXA.

Responsibilities

25. Pacific Prime CXA management is responsible for ensuring compliance with all applicable data protection laws. This responsibility is shared with Pacific Prime CXA's Data Protection Officer (as may be applicable), and its Information Technology and Human Resources departments.

26. All Pacific Prime CXA employees are responsible for following data protection laws and complying with this Privacy Policy. Pacific Prime CXA employees are required to report breaches of applicable data protection laws to its management, which they are aware of.