

個人資料收集聲明

生效日期：2024 年 9 月 3 日

收集目的

由 OneDegree Hong Kong Limited (「本公司」、「我們」) 不時收集或持有的客戶 (包括保單持有人、受保人、受益人、保費付款人及索償人) 個人資料，其中亦包括在本公司日常業務過程中以及就持續與客戶的關係而收集或產生的資料 (例如從第三方收到的索償資料和病歷)，均可供本公司使用作以下為向客戶提供服務而必須的用途 (「必須用途」)：

- 處理及評估就本公司的產品或服務的申請/資料遞交
- 管理客戶所持有本公司的產品，並提供相關服務
- 辦理付款要求及直接付款授權
- 處理及調查客戶所持有本公司的產品的索償個案
- 進行客戶意見調查
- 進行市場研究，設計及/或改善本公司的產品與服務
- 直接推廣本公司的產品或服務 (請參閱使用個人資料作直接推廣部份)
- 為遵守所有本公司所受限制的 (香港或其他國家) 法例、法規、法規指引、法庭命令或本公司與任何管轄區域的監管機構或政府之間的協議項目下的義務或其他承諾
- 追討債務
- 以便本公司的認可服務供應商，就上述目的為本公司及 / 或客戶提供服務
- 履行與上述任何用途直接相關的其他用途

我們在客戶自願的原則下收集個人資料，包括姓名、地址、電話號碼、傳真號碼、電郵地址等。若客戶拒絕提供個人資料，我們有可能無法跟進客戶的要求。在未經客戶同意之情況下，除非法律容許或要求，客戶提供的個人資料不會被用於列明用途以外的用途。

我們會向誰披露客戶的個人資料？

我們會就**必須用途**向下列承讓人披露客戶的個人資料：

- 任何向本公司提供行政、電訊、技術、電腦、付款、保單管理、儲存、雲端、記錄管理、熱線中心、郵寄、印刷、資料處理、客戶滿意度分析、市場推廣、外判或其他與本公司業務運作有關服務的代理人或承包商，無論是第三方或本公司之關聯公司

- 第三方服務供應商，包括保險公司、再保公司、再保經紀、銀行、法律顧問、會計師、金融機構、調查員、公證行、醫護及復康顧問、醫院、獸醫診所及寵物醫院、測量師、維修人員、緊急服務提供者、研究與分析公司及資料處理者；
- 信貸諮詢機構；在客戶欠賬時，任何債務追收代理或進行索償或調查服務的公司
- 根據對本公司具約束力的任何法例，及就任何由本地或外地政府、監管、稅務或執法機構、公認行業組織、或其他機關所頒佈且本公司預期須遵守的任何規例、守則或指引而言，本公司有責任或必須向其作出披露的任何人士
- 根據本公司與本地或外地政府、監管、稅務或執法機構、公認行業組織、或其他機關具約束力的合約承諾、其他承諾或安排而言，本公司有責任或必須向其作出披露的任何人士
- 根據主管司法權區的法院的任何頒令的任何人士
- 整合保險業申索和承保資料的組織、防欺詐組織、僱主、警察、數據庫或登記冊（及其運營者）

我們從何收集客戶的個人資料？

我們會從多個途徑收集客戶的個人資料，包括：

- 網上的登記、報價、保險申請或理賠申請
- 客戶就查詢、投訴、意見回饋或參與（線上及線下）推廣活動填寫的表格
- 任何客戶在我們的網頁上參與的意見調查或投票
- cookies或其他相似的技术
- 客戶透過電郵、線上對話、電話或其他通訊系統與我們聯絡

我們會保留客戶的個人資料多長時間？

我們將在履行服務必需及法律要求的期間內保留客戶之個人資料。一般而言，自我們與客戶結束商業關係起，最多會保留客戶的個人資料7年。

使用個人資料作直接推廣

我們會使用客戶的個人資料，以不同的渠道包括電郵、平台訊息或任何電子信息等方法，聯絡客戶以作直接推廣。

在我們使用客戶的資料作為直接推廣用途前，我們必須得到客戶的同意（包括表示不反對該用途）。如客戶不希望我們使用客戶的個人資料作直接推廣之用途，請於我們收集個人資料時，不選取接收推廣信息方格以表示意願。如日後客戶希望更改對我們使用其個人資料以作直接推廣用途的意願，請聯絡我們的私隱保障聯絡主任（請參考下述聯絡方法）。

查閱及更正個人資料

如客戶希望查閱或更正我們持有其個人資料，或更改客戶對我們使用其個人資料以作直接推廣用途的意願，或查詢我們有關個人資料的政策及慣例，可電郵我們的私隱保障聯絡主任 (dpo@onedegree.hk)。我們的私隱保障聯絡主任會在合理可行的時間內回覆客戶。

更改或更新本聲明的權利

我們保留隨時更改或更新本聲明的權利而無須事先通知。所有更改或更新將透過我們的網站或以書面形式（其中包括電子形式）通知客戶，並將於刊登後即時生效。若客戶與我們持續保險或其他業務關係，將表示客戶同意就使用該客戶個人資料的必須用途作出的更改和更新，否則我們無法與客戶持續保險或其他業務的關係。

如中、英文兩個版本有任何抵觸或不相符之處，應以英文版本為準。

Personal Information Collection Statement (“PICS”)

Effective Date: 3 September 2024

Purpose of Collection

The personal information of customers (including policyholders, insured persons, beneficiaries, premium payors, and claimants) collected or held by OneDegree Hong Kong Limited (“ODHK”, “we”, “our”, “us”) from time to time, which also includes data collected or generated in the ordinary course of ODHK’s business and the continuation of relationship with the customer (such as claim information and medical history received from third parties), may be used by the ODHK for the following purposes necessary (“**necessary purposes**”) in providing services to the customers :

- processing and evaluating any applications or requests made by you for products/services offered by us;
- administering and providing services in relation to the ODHK policies you hold;
- processing requests for payment, and for direct debit authorization;
- processing, investigating and adjudicating claims in relation to the ODHK policies you hold;
- conducting customer surveys;
- market researching, designing and/or enhancing ODHK’s products and services;
- promoting ODHK’s products or services via direct marketing (please refer to **Use of Personal Data for Direct Marketing**);
- complying with the laws and regulations in applicable jurisdictions, or obligations under an agreement or commitment between ODHK or its associated companies and the regulator or government in applicable jurisdictions to which ODHK is subject to;
- collecting debts;
- facilitating ODHK’s authorized service providers to provide services to ODHK and/or the customers for the above purposes;
- fulfilling other purposes which are directly related to any of the above purposes.

Personal data is collected from you on a voluntary basis. Personal data may include name, address, telephone number, fax number, e-mail address etc. Refusal to supply personal data may result in us being unable to process the request. Personal data will not be used for any other purposes without your consent unless such use is permitted or required by law.

Who are we going to share personal data with?

We may share any personal data with the following parties for the **necessary purposes**:

- any agent, contractor or third party, or ODHK’s associated companies who provides administrative, telecommunications, technology, computer, payment, policy administration, storage, cloud, record management, call centre, mailing and printing, customer satisfaction analysis marketing, outsourcing or other services to ODHK in connection with the operation of its business;
- third party service providers including insurers, reinsurers, reinsurance brokers, bankers, legal advisors, accountants, financial institutions, investigators, loss adjusters, medical and rehabilitation consultants, hospitals, veterinarian clinic and pet hospital, surveyors, repairers, emergency service providers, research and analysis companies and data processors;

- credit reference agencies, and, in the event of default, any debt collection agencies or companies carrying on claim or investigation services;
- any person to whom ODHK is under an obligation or otherwise required to make disclosure under the requirements of any law binding on ODHK or any of its associated companies and for the purposes of any regulations, codes or guidelines issued by local or foreign governmental, regulatory, tax or law enforcement authority, industry recognized bodies or other authorities with which ODHK or any of its associated companies are expected to comply;
- any person to whom ODHK is under an obligation or otherwise required to make disclosure pursuant to any contractual or other commitment or arrangement with local or foreign governmental, regulatory, tax or law enforcement authority, industry recognized bodies or other authorities that is assumed by or imposed on ODHK or any of its associated companies;
- any person pursuant to any order of a court of competent jurisdiction;
- organizations that consolidate claims and underwriting information for the insurance industry, fraud prevention organizations, employers, the police and databases or registers (and their operators)

How do we collect personal data?

There are a number of ways we can collect personal data, including:

- online registration, quotation, insurance application or claims filing
- form you filled in for filing an inquiry, complaint, feedback or participation of online or offline promotional campaigns
- any online survey or poll you complete on our website
- cookies or similar technology
- your email, live chat, call record or communication via any other system with us

How long will we keep personal data?

We will keep any personal data as long as it is necessary to fulfil necessary purposes and to comply with various legal requirements. In general, we will keep your personal data for a maximum of 7 years counting from the date of termination of our business relationship.

Use of Personal Data for Direct Marketing

We would like to keep customers informed of products and services that ourselves or our business partners may offer in the future. We may inform customers by email, platform notification or other electronic channels.

Before using your personal data for direct marketing, we must obtain your consent. If you object to ODHK's use of your personal data for direct marketing purposes, please indicate your preference by deselecting the opt-in box. If you wish to change your preference in the future in respect of ODHK's use of your personal data for direct marketing purposes, please contact ODHK's Data Protection Liaison Officer with the contact information shown below.

Data Access, Correction, Opt-out and Enquiries

If you wish to request access to or correction of your personal data held by us, opt-out of our use or transfer of your personal data for direct marketing purposes to which you have consented before, and/or make any enquiries about our privacy policy and practices, you may do so by sending an email to our Data Protection Liaison Officer: dpo@onedegree.hk

With purposes or questions clearly stated in the message, the Data Protection Liaison Officer will reply you as soon as practicable.

Amendment of PICS

We reserve the right to change or update this PICS at any time without prior notice. The changes or updates will be notified to customers on ODHK's website or in writing (which may include electronic format) and any such change or update will be effective immediately upon posting. The continuation of insurance or other business relationship with ODHK signifies a customer's agreement to the changes and updates in relation to the uses of such customer's personal information for the necessary purposes, otherwise we are unable to continue the insurance or other business relationship with the customer.

In the event of any discrepancy or inconsistencies between the English and Chinese versions of this notice, the English version shall prevail.