

Data Privacy Policy

1. About the Data Privacy Policy

Acclaim Insurance Brokers is committed to protect your Personal Data that identifies and relates to you or other individuals (such as your dependents). In this Data Privacy Policy, it is created to help you understand why and how Acclaim collects and uses your Personal Data, whom the Personal Data is disclosed and to whom data access requests can be addressed.

2. Who to contact about your Personal Data

For enquiries on the use of your Personal Data, please contact:

The Personal Data Officer
19 Keppel Road #05-00
Jit Poh Building
Singapore 089058
Office Number: 6225 5880
Email: dataprotection@acclaim.com.sg

3. Ways that we Collect Personal Data

We collect Personal Data via

- a) Insurance Company Application Form,
- b) by phone via servicing call,
- c) by phone via claims report call,
- d) Insurance Company Claims form,
- e) emails and other communications as well as from other insurers, claims investigation, medical professionals, witnesses and other third parties involved in our business dealings with you.

4. Types of Personal Data that we Collect

Personal Data collected may include:

- a) Your name, identification number, passport number, employment pass number/ FIN number, address, e-mail, telephone details, gender, marital status, status; date of birth; educational background; driving records; employment history, skills and experience; professional licenses and affiliations; relationship to the policyholder, insured or claimant; and date and cause of death, injury or disability.
- b) Credit card account details, bank account details and other financial information,
- c) Medical and Health Information

- Existing or past medical, physical or mental condition, health status, disability or injury, medical procedures performed and personal habits.
- d) **Other Personal information**
Information relating to your memberships with trade bodies and/or social clubs and/or religious groups including beliefs, family medical history, criminal or civil litigation records that we may obtain from you or provided by you voluntarily.
 - e) **Information required by governmental authorities or agencies**
Acclaim has a duty at law to disclose information requested by any governmental authorities or agencies including but not limited to the Monetary Authority of Singapore (“MAS”), Criminal Investigation Department (“CID”) or Commercial Affairs Department (“CAD”) about our current or previous dealings with policyholders and claimants for investigations into money laundering, drug trafficking or other serious crimes under the “Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act or the Terrorism (Suppression of Financing) Acts, and Acclaim may also share information about our dealings with policyholders and claimants for this purpose.
 - f) **Information required by us to offer you our services**
Location address and identification (vehicle license plate) of property insured; travel plans; particulars of individuals you wish to insure; policy and claim numbers; coverage/loss details; prior accident or loss history; your status as director or partner, or other ownership or management interest in an organization; and other insurance you hold.
 - g) **Marketing and feedback**
Information on your marketing/sales promotion preferences, or feedback to a voluntary customer satisfaction survey.

5. How We Use Personal Data

We only collect any of the above Personal Data which we believe to be relevant to understand your insurance needs, to conduct our business and to provide on-going customer service. In this regard, the particular purposes for which Personal Data may be collected and used by Acclaim are as follows:

- a) Communicate with you and others in relation to our business.
- b) Provide risk and insurance consultancy services to you including administering, maintaining and managing such services including renewals.
- c) Send important information to you regarding your policies and other administrative information.
- d) Forwarding the information you provided to the Insurance Companies for them to process, assess and determine any applications or requests made by you for insurance products or services.
- e) Handle claims made under any insurance policies or in respect of any services provided by Acclaim including but not limited to analysing, investigating, processing, assessing, determining or responding to such claims.
- f) Deliver services and activities related to the insurance policies and/or consultancy services provided by Acclaim or Insurance Companies including, but not limited to

obtaining reinsurance, insurance review, and maintenance of online and other service.

- g) Assess your eligibility for payment plans, and processing your premium and other payments.
- h) Improve quality, providing training and security through, monitoring and recording phone calls).
- i) Preventing, detecting and investigating crime, including fraud and money laundering, and analysing and managing other commercial risks.
- j) Market research and analysis, including satisfaction surveys.
- k) Providing marketing information to you including information about other products and services offered by selected third-party partners.
- l) Comply with our internal policies and procedures, including but not limited to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management.
- m) Handle complains and feedback
- n) Allow you to request for access for your data and for correction.
- o) Comply with applicable laws and regulatory obligations (including laws outside of Singapore), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; respond to requests from public and governmental authorities (including those outside of Singapore); and for audit, compliance, investigation and inspection purposes.
- p) Match any Personal Data held by Acclaim relating to you from time to time for any of the purposes listed in this Privacy Policy.
- q) Comply with disclosure requirements pursuant to any law binding on Acclaim for the purposes of complying with any regulations or guidelines issued by any regulatory or other authorities which have jurisdiction over Acclaim.
- r) Undertake background and identity checks for the purposes of verifying your identity so as to respond to your request for duplicate policy or other documents, to change your address in our records, or to change your bank account or payment or other details in our records.
- s) Conduct due diligence, screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or by Acclaim.
- t) Determine any amount owing to or from you and collect or recover any amount owing from you or any person who has rendered security or an undertaking for such liabilities of yours.
- u) Enable an actual or proposed purchaser, assignee, transferee, participant or sub-participant of Acclaim rights or business to evaluate the transaction intended to be the subject of the reorganisation, merger, sale, joint venture, assignment, transfer, participation or sub-participation.
- v) Establish and defend any legal rights and to protect our interest or those of any of our group companies or Insurance Company, our rights, privacy, safety or property, you or others; and pursue available remedies or limit our damages.

6. Transfer of Personal Data

Acclaim is member of several global networks, for the purposes set out above, we may transfer your Personal data to our network partners located in other countries that may have a different data protection regime. Personal Data collected in Singapore by Acclaim may be transferred to places outside of Singapore (such as our network partners, service providers and governmental or regulatory authorities) in order to carry out the purposes, or directly related purposes, for which the Personal Data was collected. Where such a transfer is performed, it will be done in compliance with the applicable law.

7. Sharing of Personal Data

Acclaim may make Personal Data available to:-

a) Other Insurance and distribution parties

In the course of marketing and placing insurance and processing claims on your behalf, Acclaim may make Personal Data available to third parties such as our network partners, insurers; reinsurers; insurance and reinsurance brokers and other intermediaries and agents; appointed representatives; distributors; affinity marketing partners; and financial institutions, securities firms and other business partners.

b) Our Service Providers

External third-party service providers, such as medical professionals, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors; travel and medical assistance providers; call center service providers; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; third-party claim administrators; document and records management providers; claim investigators and adjusters; construction consultants; engineers; examiners; jury consultants; translators; and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

c) Governmental authorities and third parties involved in court action

Acclaim may also share Personal Data with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside of Singapore; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside of Singapore; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, and/or that of our

group companies, you or others; (g) to allow us to pursue available remedies or limit our damages; and (h) for audit, compliance, investigation and inspection purposes

d) Other Third Parties

We may share Personal Data with payees; emergency providers (fire, police and medical emergency services); retailers; medical networks, organizations and providers; travel carriers; credit bureaus; credit reporting agencies; and other people involved in an incident that is the subject of a claim; as well as purchasers and prospective purchasers or other parties in any actual or proposed reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock. To check information provided, and to detect and prevent fraudulent claims, Personal Data (including details of injuries) may be shared with other insurers when dealing with claims to detect, prevent and investigate fraud.

8. Security

Acclaim will take reasonable measures inline with applicable privacy and data security laws. However, we cannot guarantee that data transmission over the Internet or data storage system is 100% secure. If you have any concern with the communication/ correspondence with Acclaim, please contact us. (See the “Who to Contact About Your Personal Data” section above.).

9. Retention of Personal Data

Acclaim takes reasonable steps to ensure that the Personal Data

- a) We retain is for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this Privacy Policy. Acclaim will destroy any Personal Data it may hold in accordance with its internal policy:
- b) Personal Data will only be retained for as long as is necessary to fulfill the original or directly related purpose for which such data was collected, unless the Personal Data is also retained to satisfy any legal obligations;

10. Personal Data of other Individuals

Concerning Personal Data of others provided by you to Acclaim, it will be deemed that you will

- a) Inform the individual about the content of this Privacy Policy; and
- b) Obtain any legally- required consent for the collection, use, disclosure, and transfer (including cross- border transfer) of Personal Data about the individual in accordance with this Privacy Policy.

11. Marketing Preferences

Acclaim may send you marketing- related emails from time to time. If you no longer want to receive marketing- related emails from Acclaim, you may opt- out by contacting the Personal Data Officer at the above address. Your request will be attended to within 60 days of receiving your request. However, please note that we will not be able to remove your Personal Data from the databases of third parties with whom we have already shared your Personal Data prior to receiving your opt- out request. Further, we may still send you other important administrative communications.

12. Access and Correction Request

Under the Personal Data Protection Act, an individual have the right to access and/ or correct the Personal Data held in the possession or under the control of Acclaim in certain circumstance.

13. Changes to this Privacy Policy

We review this Privacy Policy periodically and reserve the right to make changes at its discretion.