

NOW HEALTH INTERNATIONAL DATA PRIVACY NOTICE

Now Health International takes data privacy very seriously and this notice is designed to help you understand how we use your personal information.

We encourage you to read the whole notice. Alternatively, if you wish to read about specific privacy practices that interest you, please refer to the specific sections below.

THE PURPOSE OF THIS PRIVACY NOTICE

1. Identity

Now Health International (Investments) Limited. Our address is 15/F, AIA Tower, 183 Electric Road, North Point, Hong Kong. You can contact us by post at the above address, by email at hello@now-health.com or by telephone on + 852 2279 7310.

2. Our use of personal information

We are a provider of international private medical insurance and we provide innovative international private medical insurance products to our customers.

3. This privacy notice

This is our main general privacy notice that applies across our business, although we may publish additional privacy statements that apply to our operations in specific countries to comply with local data protection requirements.

4. Updating this privacy notice

This notice may be updated from time to time to reflect changes in the law, the technology we use, our data practices and how we choose to use your data. This version is dated 6 October 2020.

5. What is personal information?

Personal information is information that relates to you or allows us to identify you. This includes obvious things like your name, address and telephone number but can also include less obvious things like your attendance at a clinic or an analysis of your use of our websites.

There are different types of personal information. The most important types for you to know about are:

- Personal information such as your name, title, home address, gender, date of birth, email addresses and telephone numbers;
- Identity documents including passport, visa, driving licence and identification numbers issued by government bodies;
- Employment status;
- Family history including details of your spouse and dependants; and
- Special categories of “sensitive personal information” refers to personal information which is subject to additional protection under data protection legislation. This can include information about one’s health, racial or ethnic origin, criminal convictions, political opinions, religious or philosophical opinions and sexual orientation.

6. Our responsibility to you

We process your personal information in our capacity as a controller. This means that we are responsible for ensuring that we comply with relevant data protection laws when processing your personal information.

7. Data protection officer

We have a data protection officer in each region whose job is to oversee our data protection compliance. You can contact our data protection officer by sending:

- an email to: compliance@now-health.com

YOUR PERSONAL INFORMATION

1. Why are we collecting personal information about you?

We only collect personal information about you in connection with providing our services and running our business. We will hold information about you if:

- you are a customer, a representative of a customer, or an employer of a customer
- your information is provided to us by a customer or others, or we may obtain your information in connection with our activities as an insurance provider
- you provide services to Now Health
- you act on behalf of a regulator, certification body or other government body with whom we have dealings
- you are a job applicant

2. What personal information do we collect about you?

The types of information we process about you may include:

Types of Personal Information	Details
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details	Identification numbers issued by government bodies or agencies, such as your national insurance number, passport number, tax identification number and driving licence number.
Financial information	Bank account or payment card details, income, or other financial information.
Credit, anti-fraud, and sanctions data	Credit history, credit score and information received from various anti-fraud and sanctions databases relating to you.
Special categories of personal information	Information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; your genetic and biometric data; and information about your sex life or sexual orientation.
Identifiers	Information which can be traced back to you, such as an IP address, a website tracking code, or electronic images of you

3. Where do we collect your personal information from?

We collect your personal information from various sources, including:

- you on behalf of yourself and/or your spouse and dependants
- your employer
- other third parties including insurance brokers, hospitals, medical practitioners, and emergency service evacuation providers
- other health insurance providers where policies are transferred to Now Health
- credit reference agencies
- anti-fraud databases, sanctions lists, court judgements and other databases
- government agencies and publicly available registers
- by our use of website tracking devices or cookies and customer surveys

Which of the sources apply to you will depend on why we are collecting your personal information. Where we obtain your information from a third party, in particular your employer or a medical provider we may ask them to provide you with a copy of this privacy notice to ensure you know we are processing your information and the reasons why.

OUR USE OF YOUR PERSONAL INFORMATION

1. How do we use your personal information?

In this section we set out in more detail:

- the main purposes for which we use your personal information
- the legal bases upon which we use your personal information

Purpose	Legal Basis
<p>Know Your Customer and other legal obligations</p> <p>We obtain information about our customers and their representatives and employers and others to help us comply with legislation on money laundering, terrorist financing, and sanctions.</p> <p>We also collect and disclose personal information under applicable legislation and under orders from courts and regulators. Our disclosures will be to those bodies and persons who are entitled to receive the required information.</p> <p>In some cases, this information will include special categories of personal data.</p>	<p>For all information - compliance with a legal obligation.</p> <p>For special category and criminal data - preventing or detecting unlawful acts, and suspicion of terrorist financing or money laundering.</p>
<p>Customer Service</p> <p>We collect information about you in connection with your application for health insurance and the provision of services to you and/or your spouse/dependents once you are covered. We also collect information to enable us to communicate with you and deal with any queries about your application for coverage.</p>	<p>Legitimate interests</p> <p>We have a legitimate interest in being able to assess your application for insurance and for the performance of an insurance contract.</p>
<p>Marketing</p> <p>We use relationship management software to understand the strength of our relationship with our customers and potential customers, which includes individual representatives of those customers - for example records of frequency of contact with those individuals.</p>	<p>Legitimate interests</p> <p>We have a legitimate interest in understanding our relationship with our customers and potential customers. Using the frequency of your contact with our firm and analysing how you interact with our marketing activities is a reasonable means of doing so.</p>
<p>Visitors to our websites</p> <p>Several facilities on our websites invite you to provide us with your personal information. Where you provide us with information, we will only use it for the purpose for which it has been provided by you.</p> <p>Most of our websites use a small number of non-intrusive cookies to help them work more efficiently and to provide us with information on how the website is being used. In particular, the sites use Google Analytics, a web-based analytics tool that tracks and reports on the way the website is used to</p>	<p>Legitimate interests</p> <p>We have a legitimate interest in providing to you the facilities on our websites that you have requested and in understanding how our websites are used and the relatively popularity of the content on our websites.</p>

Purpose	Legal Basis
<p>help us to improve it. Google Analytics does this by placing 'cookies' on your device. Note that Google will also have its own control of this information and will hold it on its servers in the United States in accordance with its own privacy policies.</p>	
<p>Visitors to our offices</p> <p>We have security measures in place at our offices, which include building access controls and may include CCTV. Images captured by CCTV are securely stored and only accessed on a need to know basis (e.g. to investigate an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft or other</p>	<p>Legitimate interests</p> <p>We have a legitimate interest in making sure our offices, and the people that visit and work at our offices, are safe and secure.</p>
<p>Business purposes</p> <p>We use information for business purposes including systems development, testing, diagnostics, collecting management information, internal audits, statistical analysis and to improve the quality of our customer service. We may also need to use your sensitive personal information to establish, exercise or defend our legal rights where we are involved in legal proceedings.</p>	<p>Legitimate interests</p> <p>As a regulated health insurance intermediary, we have a legitimate interest in being able to manage our business effectively and to develop and improve the services we offer.</p>
<p>Staff Recruitment</p> <p>We ask you to provide personal information to us as part of your job application. We will also conduct checks to verify your identity and the information in your application and obtain further information about your suitability for a role within our organisation. This may include obtaining information from regulators, the electoral role and the Disclosure and Barring Service. In some cases, this information will include special categories of personal data and criminal convictions data.</p>	<p>For all information - legitimate interests</p> <p>As a regulated health insurance intermediary, we have a legitimate interest in knowing the identity and background of the individuals we employ to ensure we have the appropriate staff to comply with our various legal and regulatory obligations and ethical duties.</p> <p>For special category data and criminal data - employment protection.</p>

2. Consent

We do process your personal information based on your consent (as we can usually rely on another legal basis). Where we do process your personal information based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent please email us at compliance@now-health.com or, to stop receiving our marketing emails or firm news, please click on the unsubscribe link in the relevant email you receive from us.

3. Do we share your information with anyone else?

We do not sell your information nor make it generally available to others. But we do share your information in the following circumstances:

- Our insurance business is made up of several different legal entities around the world. Where it is necessary and appropriate to administer your health insurance policy, we may share relevant information across our office network. All our offices and legal entities are required to manage your personal information in accordance with this notice, but, subject to any local data protection requirements in a particular jurisdiction.
- If you are a customer, we may provide relevant information to search companies for the purpose of verifying your identity.

- We may utilise external companies to help us run our business more efficiently particularly in relation to IT support services.
- Where we to sell our business, then your information will be transferred to the new owner to enable them to continue the business
- We share your business with other third parties to administer insurance contracts including, brokers, insurers, reinsurers, underwriters, sanctions checking services, fraud investigators, lawyers, claims handlers, third party administrators, medical experts, loss adjustors, law enforcement organisations, other health insurance organisations when policies are transferred to and from Now Health, hospitals and medical evacuation services and where we are required to do so to comply with legal or regulatory requirements

In each case where we share your information with one of our service providers, the service provider is required to keep it safe and secure. They are also not permitted to use your information for their own purposes.

OTHER IMPORTANT THINGS YOU SHOULD KNOW

1. Keeping your personal information safe

We take security issues seriously. We implement appropriate steps to help maintain the security of our information systems and processes and prevent the accidental destruction, loss, or unauthorised disclosure of the personal information we process.

2. Profiling and automated decision making

We do use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention). This is designed to improve our business processing to e.g. speed up the payment of claims. We use personal data to determine your eligibility for cover under your policy. You have a right to opt out of automated decision-making and you can contact us at compliance@now-health.com to request this. However, in certain circumstances this could affect our ability to offer you a policy as automated decisions are necessary to provide benefits and/or pay claims under your policy.

3. How long do we keep your personal information?

We do not keep your personal information forever.

We keep your personal information in accordance with our global data retention policy which categorises all the information held by us and specifies the appropriate retention period for each category of information. Those periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

4. Cross border transfers of your personal information

We are a provider of international private medical insurance products and we operate on a global basis to provide medical insurance services to our customers.

The global nature of our business means that your personal information may well be transferred across national boundaries, including, potentially, to countries that do not require organisations by law to look after your personal information in the way in which you have come to expect in your own country.

Where we transfer your personal information across national boundaries, we will protect your personal information by ensuring that those transfers are made in compliance with all relevant data protection laws. Generally, this means where we transfer your personal information to a third party that is located in a country which does not have adequate privacy protection, we will put in place a contract with the third party that includes the standard international data transfer contractual terms approved by the European Commission.

We also have in place a global data protection policy which we follow worldwide and which is based on EU data protection principles.

If you would like further details of how your personal information is protected when transferred from one country to another then please email us at compliance@now-health.com.

5. Local differences

Whilst this notice describes the data protection practices adopted by us generally across the world, local data protection laws vary, and some countries may place restrictions on our processing activities. This means our actual data protection practices in certain countries may vary from those described here to help us ensure we comply with local requirements.

YOUR RIGHTS

1. Contacting us and your rights

If you have any questions in relation to our use of your personal information, please email us at compliance@now-health.com. Under certain conditions, you may have the right to require us to:

- Provide you with further details on the use we make of your personal information
- Provide you with a copy of the personal information we hold about you
- Update any inaccuracies in the personal information we hold about you
- Delete any of your personal information that we no longer have a lawful ground to use. If for any reason we are unable to delete your data e.g. to comply with other legal or regulatory requirements we will provide you with reasons why.
- Where processing is based on consent, stop that processing by withdrawing your consent. Please note that by withdrawing your consent that it may affect our ability to manage your contract and deal with claims which could result in your policy being cancelled. We will advise you of the consequences of your request.
- Object to any processing based on our legitimate interests unless our reasons for carrying out that processing outweigh any prejudice to your data protection rights.
- Restrict how we use your personal information whilst a complaint is being investigated
- Transfer your personal information to a third party in a standardised machine-readable form

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). We are obliged to keep your personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

2. Your right to complain

If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal information or, where you are based, the data protection authority in your country.

We view the UK data protection regulator, the Information Commissioner's Office (ICO), as our lead data protection supervisory authority. Details of the ICO can be found at: <https://ico.org.uk> and their address is:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow
Cheshire SK9 5AF, United Kingdom

You can also make a complaint with to another supervisory authority which is based in the country or territory where you reside / work.

If you are unsure of the authority that supervises our processing of your personal information, then please email us at compliance@now-health.com and we will provide you details about your local supervisory authority.