

# Privacy Policy Statement

Lockton Companies (Hong Kong) Limited and Lockton Companies (Hong Kong) Insurance Agency Limited (collectively referred to as “Lockton”) will treat any personal information we receive in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”).

## 1. KINDS OF PERSONAL INFORMATION HELD

Lockton holds records containing personal information supplied by data subjects in the following manners:

- 1.1 We may collect personal information in the course of provision of our services to customers and beneficiaries.
- 1.2 We may collect personal information in the course of administration of insurance policies (eg group policies) and investigation and management of insurance claims.
- 1.3 We may collect personal information in all our business dealings with our potential customers, business partners and vendors.
- 1.4 The kind of personal information we collect include personal details; marital and family details; contact details; employment, income, personal and business financial information; medical and health details; details of other insurance, financial and investment products held and claims history.

## 2. MAIN PURPOSES OF KEEPING PERSONAL INFORMATION

Personal information are held by Lockton for:

- 2.1 Offering, providing and marketing our services to customers;
- 2.2 To manage claims or potential claims notified by or made against or otherwise involving our customer relating to insurance policies of our customers and to compile claims statistics/history;
- 2.3 To conduct market analysis and research;
- 2.4 To comply with our obligations under the applicable laws, regulations, codes of conduct or guidelines etc. issued by regulatory authorities/bodies in any jurisdiction; and
- 2.5 Enforcement or protection of our rights and defence of claims against us.

### 3. TRANSFER OF PERSONAL INFORMATION

Personal information will be kept confidential but may be provided to:

- 3.1 Our affiliates, (re)insurance companies/intermediaries and other service providers for purposes of offering, providing and marketing our services to customers;
- 3.2 Agents, contractors or professional advisors of the parties referred to in 3.1;
- 3.3 Our affiliates, professional advisors or other service providers for purposes of investigation and management of claims or potential claims or claims made against or otherwise involving our customers relating to insurance policies of our customers;
- 3.4 Any parties under a duty of confidentiality to us or our affiliates which has undertaken to keep such information confidential;
- 3.5 Personal information collected in the course of investigation and management of claims or potential claims may be provided to our customers, (re)insurance companies, loss adjustors and other professional advisors for purposes of investigation and management of claims, negotiation or arrangement of insurance policies;
- 3.6 Our agents, employees, contractors, professional advisors or any third parties providing services to us in connection with the operation of our business;
- 3.7 To regulatory authorities/bodies in any jurisdiction pursuant to any laws, regulations, codes of conducts or guidelines etc applicable to Lockton;
- 3.8 Credit reference agencies, providers of risk intelligence for the purpose of customer due diligence or anti-money laundering screening; and
- 3.9 Professional advisors, agents, contractors or other service providers for purposes of protection and enforcement of our rights and defence of any claims against us.

### 4. USE OF PERSONAL INFORMATION IN DIRECT MARKETING

Lockton intends to use personal information collected in direct marketing and Lockton may not so use the information unless there is consent (which includes an indication of no objection) to the intended use.

Lockton may use name, contact details, date of birth, transaction pattern and behaviour of our customers to send marketing materials and to conduct direct marketing activities in relation to (re)insurance and/or risk consulting/management services, wealth management services, employees' benefits services, (re)insurance products, health, medical, fitness, wellness, travel, entertainment, food & beverage services offered by us.

## 5. TRANSFER OF PERSONAL INFORMATION IN DIRECT MARKETING

In addition to use of the personal information by itself, Lockton also intends to transfer the personal information referred to in Paragraph 5 to companies within the Lockton Group, (re)insurance companies, providers of health, medical, employees' benefits, fitness, wellness, travel, entertainment, food & beverage services in and outside Hong Kong to send marketing materials and to conduct direct marketing activities of the services offered by them. However, Lockton may not transfer the information described above unless there is consent (which includes an indication of no objection) to the intended transfer.

If you prefer not to receive marketing materials from us, please write to us at 9/F, PCCW Tower, TaiKoo Place, 979 King's Road, Island East, Hong Kong. We shall without charge to you, ensure that you are not included in future direct marketing activities.

## 6. DATA ACCESS AND CORRECTION REQUEST

You have a right under the PDPO to make a data access or correction request concerning your personal information held by us. We may charge a fee for processing a data access request. You may make such a request by writing to our Data Access Officer at 9/F, PCCW Tower, TaiKoo Place, 979 King's Road, Island East, Hong Kong and completing a Data Access Request Form specified by the Privacy Commissioner for Personal Data ("the Commissioner") which can be downloaded from the website of the Office of the Commissioner at [www.pcpd.org.hk](http://www.pcpd.org.hk).

## 7. COOKIES

Cookies are programmes which track the movements of individual visitors to the website and gather information. We may use cookies to enable our website to remember you and your preferences when you visit our website and enable us to tailor the website to your needs. You may refuse the cookie, if you wish to do so, you will need to adjust your browser settings.

## 8. CHANGES TO PRIVACY POLICY STATEMENT

We may revise this Privacy Policy Statement at any time by updating this posting.