



# LOCKTON SINGAPORE'S DATA PRIVACY POLICY

August 2014



# Lockton Singapore's Data Privacy Policy

Lockton Companies (Singapore) Pte Ltd (hereinafter referred to as "Lockton Singapore", "we", "us" or "our") are committed to protecting the privacy of individuals. This Data Privacy Policy sets out how we collect, use and protect the personal data we collect in the course of our business. It applies to personal data an individual provides to us, and subject to local law, any personal data we collect from other sources.

## 1. What is Individual personal data?

Individual personal data as provided in the Personal Data Protection Act (No. 26 of 2012) means natural person's data, whether living or deceased, whether true or not, about an individual who can be identified from that data; or from that data and other information to which the organisation has or is likely to have access.

Examples of individual personal data include but not limited to:

- 1) Unique identifiers
  - a) NRIC number;
  - b) Passport number; or
  - c) Fin number.
- 2) Any set of data
  - a) Name;
  - b) Age;
  - c) Address;
  - d) Telephone number;
  - e) Occupation.

## 2. What type of information does Lockton Singapore collect?

We collect personal information to provide our services and products. These include insurance broking, claims management, risk management consulting, and all related and incidental services.

We may collect information such as an individual's name, contact details, date of birth, gender, marital status, financial details, employment details and benefit coverage. In addition, we may collect sensitive information about an individual such as health information or criminal convictions in relation to certain insurance products namely, life, health, professional liability, workers compensation or employee benefit programmes.

When anyone requests our services, we ask that we be provided with accurate and necessary information so that we can respond to the request. It is deemed that the person providing the information requested has consented to our collection, use, storage and disclosure of the same to appropriate third parties for the purposes described in this Statement.

Besides receiving personal information directly as stated in the above paragraph, we may also receive such information from our affiliates or other third parties (e.g. employers, insurance companies, insurance brokers or agents, credit organisations, motor vehicle and driver licensing authorities, financial institutions, medical professionals etc.).

Anyone providing personal information about other individuals such as employees, dependants etc., must obtain those individuals' consent prior to disclosing the same to us.

## 3. How does Lockton Singapore use individual personal data

We may use the personal information collected to:

- ❖ Provide products and services requested of us;
- ❖ Administer, maintain, manage and operate such products and services which may include human resource consulting, insurance/reinsurance broking, claims management, risk management consulting and all related and incidental services;

- ❖ Determine eligibility and process applications for products and services;
- ❖ Communicate, service, raise invoices and administer;
- ❖ Process, manage and administer claims;
- ❖ Assess on-going needs and offer products and services to cater to those needs;
- ❖ Produce reports, conduct market research, and data analysis;
- ❖ Obtain and update credit information with relevant third parties such as credit agencies, where transactions are made on credit;
- ❖ Develop, design and promote new products and services;
- ❖ Market products, services, offers or events, and conduct checks with "Do Not Call Registry(ies)";
- ❖ Comply with any law, rules, regulations, codes of practice, orders or requests by any court, regulator, law enforcement authority or other government/official bodies/agencies (local or foreign) and internal policies and procedures;
- ❖ Comply with any requirements or arrangements with local or foreign regulatory or tax authorities imposed by law or assumed by us for the protection of our financial, commercial or other legitimate interests;
- ❖ Prevent, investigate, detect offences, crimes and breaches including identity fraud, credit, money laundering and conflict checks, handle and investigate complaints or security threats;
- ❖ To enforce, defend and protect the property or rights of Lockton Singapore and its affiliates;
- ❖ Facilitate any proposed or actual assignment, transfer, participation or sub-participation in any of our rights or businesses;
- ❖ Conduct processing necessary to fulfil other contractual obligations for the individual or which are reasonably related to the aforementioned purposes.

We may also use the personal information for any additional purpose subject to the consent of the individual(s) concerned.

#### **4. Third parties to whom Lockton Singapore may disclose personal information**

We disclose personal information to business partners, who are necessary to provide our products and services. They include:

**Insurance broking and insurance products** – insurers, reinsurers, other insurance intermediaries, insurance reference bureaux, medical service providers, lawyers, surveyors, loss adjustors, claims adjustors and others involved in the claims handling process.

**Lockton Singapore's related companies and affiliates** in the provision of our products and services. In addition, they may inform the persons concerned of the products and services they offer, which may be of advantage to them, unless they tell us not to do so.

**Authorised Service Providers** – We may disclose personal information to service providers we have retained to perform services on our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirement.

**Legal Requirements and business transfers** – We may disclose personal information:

- ❖ If we are required to do so by law or legal process, or to comply with requests by law enforcement authority or other governmental authority(ies);
- ❖ When we believe it is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity;
- ❖ To the new owner in the event Lockton Singapore is subject to a merger or acquisition;
- ❖ To comply with audits or to investigate a complaint or security threat.

## 5. Access to individual personal data

An individual can request by completing [Form A](#) to access his/her personal data in Lockton Singapore's possession.

Lockton Singapore relies on the person providing or updating the personal data to ensure that it is accurate, complete and correct.

Lockton Singapore is prohibited from providing access to individual personal data if the provision of the data could reasonably be expected to:

- 1) cause immediate or grave harm to the individual's safety or physical or mental health;
- 2) threaten the safety or physical or mental health of another individual;
- 3) reveal personal data about another individual;
- 4) reveal the identity of another individual who has provided the personal data, and the individual has not consented to the disclosure of his or her identity; or
- 5) be contrary to national interest.

The reason(s) for rejection will be mailed to the individual.

## 6. Correction to Individual protection data

An individual can request by completing [Form B](#) to update his/her personal data in Lockton Singapore's possession.

Lockton Singapore is to send the corrected data to other organizations to which the data has been disclosed within a year the correction is made (or, with the individual's consent, only to selected organizations).

Unless Lockton Singapore is satisfied on reasonable grounds that the correction should not be made, it should correct the personal data as soon as practicable.

An acknowledgement letter will be send via post to the individual.

## **7. Security of Personal Data**

Lockton Singapore has implemented reasonable physical, technical and administrative security measures to protect personal information from loss, misuse, alteration or destruction.

Our services providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorised purpose.

## **8. 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.

## **9. Changes to Lockton Singapore's Data Privacy Policy**

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

## 10. Contact Lockton Singapore

If you have any question relating to the privacy policy, you may:

❖ **Write to us at**

Personal Data Protection Officer

Lockton Singapore Pte Ltd

1 Raffles Place, #12-62

One Raffles Place, Tower 2

Singapore 048616

❖ **Email us at**

[data.privacy.sg@asia.lockton.com](mailto:data.privacy.sg@asia.lockton.com)

❖ **Contact us at**

+65 6326 9274



## **Our Mission**

To be the worldwide value and service leader in insurance brokerage, employee benefits, and risk management

## **Our Goal**

To be the best place to do business and to work



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