

Privacy Policy

Introduction

Avo Insurance Company Limited ("the Company") is committed to implementation and compliance with the Personal Data (Privacy) Ordinance ("the Ordinance"). The Corporate Data Protection Officer is responsible for coordinating and overseeing compliance with the Ordinance and the upholding of the Data Protection Principles set out in the Ordinance.

This Policy applies to all products and services provided by the Company and sets out how the Company may collect, process, use and disclose your personal data.

In case of any discrepancies between the English and Chinese versions, the English version shall apply and prevail.

Types of Personal Data Possessed by the Company

Personal data regarding customers:

- (i) name, address, and contact details of customers or potential customers;
- (ii) occupation, date of birth and nationality of customers, their identity card and/or passport numbers and place and date of issue thereof;
- (iii) current employer, nature of position, annual salary and other benefits of customers;
- (iv) details of properties, assets or investments held by customers;
- (v) details of all other assets or liabilities (actual or contingent) of customers;
- (vi) information obtained by the Company in the ordinary course of the continuation of the business relationship (for example, when customers lodge insurance claims with the Company or generally communicate verbally or in writing with the Company, by means of documentation or telephone recording system, as the case may be); and
- (vii) information which is in the public domain.

Personal data regarding employment:

- (i) name and address, contact details, date of birth and nationality of employees and potential employees and their spouses and their identity card and/or passport numbers and place and date of issue thereof;
- (ii) additional information compiled about potential employees to assess their suitability for a job in the course of the recruitment selection process which may include references obtained from their current or former employers or other sources;
- (iii) additional information compiled about employees in the ordinary course of the continuation of the employment relationship which may include records of remuneration and benefits paid to the employees, records of job postings, transfer and training, records of medical checks, sick leave and other medical claims and performance appraisal reports of the employees;
- (iv) relevant personal data pertaining to former employees may be required by the Company to fulfil its obligations to the former employees and its legal obligations under certain ordinances; and
- (v) information which is in the public domain.

The Company may hold other types of personal data which it needs in the light of experience and the specific nature of its business.

Accuracy of Personal Data

The Company will ensure the accuracy of all personal data collected and used by the Company. Appropriate procedures are implemented so that all personal data is regularly checked and updated to ensure that it is reasonably accurate having regard to the purposes for which that data is used. If the personal data held by the Company consists of statements of opinion, all reasonably practicable steps are taken to ensure that any facts cited in support of such statements of opinion are correct.

The Company will at all times endeavour to ensure the accuracy of personal data held by the Company, and if such personal data is transferred to third parties, it will notify that third party of any correction to be made.

Retention of Personal Data

The Company will take reasonable and practicable steps to ensure that personal data will not be kept longer than necessary. In general, the Company shall usually hold the related personal data for a period of 7 years after termination of the business relationship or such other periods as prescribed by applicable laws and regulation.

Security of Personal Data

It is the policy of the Company to ensure an appropriate level of protection for personal data in order to avoid unauthorised or accidental access, processing, erasure, loss or other use of that data, commensurate with the sensitivity of the data and the harm that would be caused by occurrence of any of the aforesaid events. It is the practice of the Company to achieve appropriate levels of security by restricting physical access to data, providing secure storage facilities and incorporating security measures into equipment in which data is held. Measures are taken to ensure the integrity, prudence, and competence of persons having access to personal data and personal data is only transmitted by secure means.

Use of Cookies and Third Party Links

The Company may use cookies to improve our internet service to you. Cookies are small data files that are automatically stored on your web browser in your computer that can be retrieved by the Company's website. Cookies enable the Company's website to remember you and your preferences when you visit the website and enable us to tailor the website to your needs. The information collected by cookies is anonymous visitor's personalised settings information and contains no name or address information or any information that will enable anyone to contact you via telephone, e-mail or any other means. No customer personal data is stored in cookies. However, you can disable cookies by changing the settings of your web browser.

The Company's website may include hyperlinks to third party websites. The Company has no control over the content, accuracy, opinion expressed, and other links provided at these third party websites or how these third party websites deal with your personal

data. You should visit these third party websites for details of their privacy policies in relation to their handling of your personal data.

Further enquiries regarding the Company's Privacy Policy may be directed to:

Corporate Data Protection Officer

Avo Insurance Company Limited,

5/F, 160 Des Voeux Road West,

Sai Ying Pun, Hong Kong

私隱政策

引言

安我保險有限公司（「本公司」）致力執行及遵守個人資料（私隱）條例（以下簡稱「條例」）。資料保護主任乃負責協調及監察條例之遵守，並維持條例所述之保障資料原則。

本政策適用於本公司提供的所有產品及服務，並列明本公司如何收集、處理、使用及披露閣下的個人資料。

中英文版本如有差異，將以英文版本為準。

本公司持有的個人資料的種類

客戶的個人資料：

- (i) 準客戶及客戶的姓名、地址和聯絡詳情；
- (ii) 客戶的職業、出生日期和國籍、其身份證及／或護照號碼及證件發出日期和地點；
- (iii) 客戶現時的僱主、職位性質、年薪及其他福利；
- (iv) 客戶持有的物業、資產或投資的詳情；
- (v) 客戶所有的其他資產或負債（實有或或然）的詳情；
- (vi) 本公司在延續與客戶正常業務關係中獲得的資料（例如，當客戶向本公司申請保險賠償或在一般情況下以口頭或書面形式與本公司溝通時，本公司亦會收集客戶的資料，當中可能以文書形式或電話錄音系統收集）；及
- (vii) 可透過公共領域取得的資料。

僱傭有關的個人資料：

- (i) 僱員或準僱員及其配偶的姓名和地址、聯絡詳情、出生日期和國籍、其身份證及／或護照號碼及證件發出日期和地點；
- (ii) 在遴選過程中進一步匯集的求職者資料，可能包括從其現任僱主或前僱主或其他來源取得的評介，藉以評估求職者是否勝任有關職位；
- (iii) 本公司在延續僱傭關係過程中收集更多關於僱員的資料，可能包括向僱員發放的工資及提供福利的記錄，僱員所擔任的職位、調職及培訓記錄，體格檢驗、病假及其他醫療補償申索記錄及僱員的工作表現評核報告；
- (iv) 本公司為履行對前僱員的責任或履行某些條例所規定的法律責任而可能保留前僱員的相關個人資料；及
- (v) 可透過公共領域取得的資料。

本公司或會持有鑑於經驗及個別特殊業務性質所需的其他種類的個人資料。

個人資料之準確性

本公司會確保其所收集及使用之個人資料的準確性。本公司已執行適當程序以定期核對及更新所有個人資料，以確保有關的資料就被使用的目的而言是為合理準確。若本公司所持有之個人資料載有意見陳述，則本公司將採取所有合理可行之步驟，確保任何引用支持該等意見陳述之事實正確無誤。

本公司會時刻致力確保其所持有之個人資料的準確性。若此等個人資料被轉交予第三方，本公司將會知會該第三方作出之有關修正。

個人資料的保留

本公司將採取一切合理及實際可行步驟，確保不會保留個人資料超過必需的時間。一般而言，本公司會在業務關係終止後保存相關的個人資料 7 年或按照有關法律或法規所規定的期限保留個人資料。

個人資料安全

本公司的政策是為確保個人資料的安全及會因應資料的敏感程度及考慮如此等事情發生便能造成的損害程度提供適度的保障，以防止資料未獲准許或意外地被查閱、處理、刪除、遺失或作其他用途。為達到適當程度的保安，本公司的一貫做法為透過提供安全的儲存設施及在資料存置設備實施保安措施，以嚴格限制資料被查閱。本公司亦會採取措施以確保處理該等資料的人士具備良好操守、審慎態度及辦事能力，以及資料只會以妥善保安的方式傳送。

使用 Cookies 及第三方連結

本公司可能使用 Cookies，以改善我們向閣下提供的互聯網服務。Cookies 是載有小量資料的檔案，自動儲存於閣下電腦的網頁瀏覽器中，並可供本網站日後檢索。當閣下瀏覽本網站時，Cookies 能讓本公司網站記下閣下及閣下的偏好設定，進而讓本公司能根據閣下的需求訂定網站內容。Cookies 收集的資料是不記名的個人化設置資料，當中並不載有姓名、地址或其他可使他人透過電話、電子郵件或其他方式聯絡閣下的資料。Cookies 並不保存客戶的個人資料。然而，閣下可以自行更改網頁瀏覽器設置以停用 Cookies。

本公司網站可能載有第三方網站的超連結。本公司對該等第三方網站提供之內容、準確性、發表之意見、其提供之連結或對該等第三方網站處理閣下個人資料之方式均無控制權。閣下應瀏覽該等第三方網站，以查閱其處理與閣下個人資料有關的詳細私隱政策。

有關本公司私隱政策之進一步諮詢，請聯絡以下人士：

香港西營盤德輔道西一百六十號五樓

安我保險有限公司

資料保護主任