



Personal Information Collection Statement

Notice to Customers and Other Individuals relating to the Personal Data (Privacy) Ordinance (the "Ordinance")

1. From time to time, it is necessary for individuals to supply Hang Seng Insurance Company Limited ("the Company") with data in connection with the provision, maintenance and administration of insurance or other financial products and services by the Company or compliance with any laws, guidelines or request issued by regulatory or other authorities. Failure to supply such data promptly may result in the Company being unable to provide or continue to provide products and services. It is also the case that data are collected from (i) data subjects in the ordinary course of the continuation of the relationship, (ii) a person acting on behalf of the data subjects whose data are provided, and (iii) other sources available to the Company. Data may also be generated or combined with other information available to the Company or any member of the HSBC Group ("HSBC Group" means HSBC Holdings plc, its affiliates, subsidiaries, associated entities and any of their branches and offices (together or individually) and "member of the HSBC Group" has the same meaning).
The purposes for which data may be used are as follows:
 - 1.1. processing, assessing and/or approving applications for and any alterations, variations, cancellation, renewals and reinstatements of any insurance, or other financial products and services, provident fund scheme or related products or services;
 - 1.2. verifying and conducting any eligibility, identity, medical and/or underwriting in connection with provision of products and/or services;
 - 1.3. offering, providing, maintaining, reviewing, administering and evaluating products and/or services including processing any claims or investigation or analysis of such claims;
 - 1.4. sales or marketing of products, services and other subjects (subject to further details in paragraph 4 below);
 - 1.5. exercising any right of subrogation, if applicable;
 - 1.6. enabling an actual or proposed assignee or transferee of the Company, or participant or sub-participant of the Company's rights to evaluate and/or undertake due diligence in relation to the transaction intended to be the subject of the assignment, transfer, participation or sub-participation;
 - 1.7. meeting the obligations, requirements and arrangements, whether compulsory or voluntary, of the Company or any member of the HSBC Group to comply with or in connection with:
 - (a) any law, regulation, judgment, court order, voluntary code, sanctions regime, within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently or in the future ("Laws") (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information); or
 - (b) any guidelines, guidance or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies* or associations of financial services providers within or outside Hong Kong existing currently or in the future and any international guidance, internal policies or procedures (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information); or
 - (c) any present or future contractual or other commitment with local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, tax, revenue, monetary, securities or futures exchange, court, central bank or other authorities, or self-regulatory or industry bodies* or associations of financial service providers or any of their agents with jurisdiction over all or any part of the HSBC Group (together the "Authorities" and each an "Authority") that is assumed by, imposed on, or applicable to the Company or any member of the HSBC Group; or
 - (d) any agreement or treaty between Authorities;
* including any association, federation or similar organisation of insurance companies ("Federation")
 - 1.8. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the HSBC Group and/or any other use of data and information in accordance with any programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
 - 1.9. conducting any action to meet obligations of the Company or any member of the HSBC Group to comply with Laws or international guidance or regulatory requests relating to or in connection with the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters;
 - 1.10. meeting obligations of the Company or any member of the HSBC Group to comply with any demand or request from Authorities;
 - 1.11. exercising any rights the Company or a member of the HSBC Group may have in connection with the products or services provided to a customer; and
 - 1.12. matching any data held by the Company or a member of the HSBC Group relating to a data subject from time to time for any of the purposes listed in this paragraph 1.
2. Data held by the Company relating to an individual will be kept confidential but may be provided to the following parties (whether within or outside Hong Kong) for the purposes set out in the paragraph 1 above except that any transfer of data to another party for sales and marketing purpose will be subject to paragraph 4 below:
 - 2.1. any member of the HSBC Group;
 - 2.2. any agents, contractors, sub-contractors, service providers, reinsurers or associates of the HSBC Group (including their employees, directors, officers, agents, contractors, service providers and professional advisers);
 - 2.3. any third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to the Company in connection with the operation of its businesses (including their employees, directors and officers);
 - 2.4. hospitals, clinics, medical practitioners, laboratories, technicians, loss adjustors, legal advisers or private investigators that may be engaged by the Company or on behalf of the Company;
 - 2.5. any actual or proposed assignee or transferee of the Company, or participant or sub-participant of the Company's rights;
 - 2.6. any Authorities;

- 2.7. any person under a duty of confidentiality to the Company including a member of the HSBC Group which has undertaken to keep such information confidential;
- 2.8. any other person in the context of the sale or transfer by the Company or any member of the HSBC Group of all or part of its business or portfolio of products, policies or other assets or any proposed or confirmed transaction relating to such a sale or transfer;
- 2.9. third party financial institutions, insurers, banks, credit card companies, securities and investment services providers;
- 2.10. third party reward, loyalty, privileges programme providers or merchants;
- 2.11. charitable or non-profit making organisations;
- 2.12. any external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that the Company engages for the purposes set out in paragraph 1.4;
- 2.13. any Federation that exists or is formed from time to time or any of its members for any of the above or related purposes set out in paragraph 1.4;
- 2.14. any person to or with whom the Company or any member of the HSBC Group is under an obligation or required or expected to make disclosure or use data for the purposes set out in paragraph 1.7, 1.8, 1.9 or 1.10 above;
- 2.15. any persons acting on behalf of an individual whose data are provided, payment recipients, beneficiaries, account nominees, intermediary, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges, companies in which the customer has an interest in securities (where such securities are held by the Company or any member of the HSBC Group) or persons acting on behalf of the customer or the individual whose data is provided for the purposes of receiving benefits under an insurance policy; and
- 2.16. any party to a transaction or potential transaction acquiring interest in, or assuming or bearing risk in, or in connection with an insurance policy including, without limitation, reinsurers.

Such information or data may be transferred to a place outside Hong Kong.

3. The Company may obtain access to and/or verify the data with the information collected by the Federation from the insurance industry.
4. The Company intends to use personal data in relation to a data subject in direct marketing and the Company requires the data subject's consent (which includes an indication of no objection) for that purpose. In this connection, please note that:
 - 4.1. the name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background and demographic data held by the Company from time to time may be used by the Company in direct marketing;
 - 4.2. the following classes of products, services and subjects may be marketed:
 - (a) insurance, banking, credit card, financial, provident fund scheme and related products and services;
 - (b) reward, loyalty or privileges programmes and related products and services; and
 - (c) donations and contributions for charitable and/or non-profit making purposes;
 - 4.3. the above products, services and subjects may be provided or (in the case of donations and contributions) solicited by the Company and/or:
 - (a) members of the HSBC Group;
 - (b) third party financial institutions, insurers, banks, credit card companies, securities and investment services providers;
 - (c) third party reward, loyalty, privileges programme providers or merchants;
 - (d) charitable or non-profit making organisations;
 - 4.4. in addition to marketing the above products, services and subjects itself, the Company also intends to provide the data described in paragraph 4.1 above to other Hang Seng Bank Group companies for use by them in marketing those products, services and subjects, and the Company requires the data subject's written consent (which includes an indication of no objection) for that purpose.

If a data subject does not wish the Company to use or provide his data to other Hang Seng Bank Group companies for use in direct marketing as described above, the data subject may exercise his opt-out right by notifying the Company.
5. A data subject has the right to request access to and correction of any of his data held by the Company. The Company has the right to charge a reasonable fee for the processing of any data access request in accordance with the terms of the Ordinance. Requests for access to data or correction of data or for information regarding policies and practices or kinds of data held can be made in writing to the Data Protection Officer, Hang Seng Insurance Company Limited, 83 Des Voeux Road Central, Hong Kong. Fax: (852) 2868 4042.

June 2014 (Updated in December 2016)

Note: In case of discrepancies between the English and Chinese version, the English version shall apply and prevail.

Hang Seng Insurance Company Limited



收集個人資料聲明

致各客戶及其他個別人士關於個人資料(私隱)條例(「條例」)的通知

1. 就恒生保險有限公司(「本公司」)提供、維持及管理保險或其他金融產品及服務或遵守任何法律或監管或其他機關發出的指引或要求，個別人士需要不時向本公司提供資料。若未能從速向本公司提供有關資料，可能會導致本公司無法提供或繼續提供產品及服務。本公司亦會從以下各方收集資料：(i)資料當事人與本公司日常業務往來中、(ii)代表資料當事人行事的人士提供資料當事人的資料，及(iii)其他可供本公司獲取資料的來源。資料亦可能與本公司或任何滙豐集團成員(「滙豐集團」)一併或分別地指滙豐控股有限公司，其附屬公司、子公司、聯營單位及彼等的任何分行及辦事處。而「滙豐集團成員」具有相同涵義)可獲取的其他資料組合或產生。資料可被用作下列用途：
 - 1.1 處理、評估及／或審批任何與保險或其他金融產品及服務、公積金計劃或相關的產品或服務的申請，及任何與保險或其他金融產品及服務、公積金計劃或相關的產品或服務的修改、更改、取消、續期或復效申請；
 - 1.2 為提供產品及／或服務進行有關查核及資格審查、身分識認、健康評估及／或評保；
 - 1.3 提議、提供、維持、檢討、管理及評估產品及／或服務，包括處理任何索償，或該等索償的調查或分析；
 - 1.4 銷售或推廣產品、服務及其他標的(詳情須依據以下第4段所述)；
 - 1.5 行使任何代位權，如適用；
 - 1.6 允許本公司的實際或建議承讓人或受讓人，或本公司的權益的參與人或附屬參與人，就涉及的轉讓、出讓、參與或附屬參與的交易進行評估及／或盡職審查；
 - 1.7 遵守本公司或任何滙豐集團成員就以下各項負上或與之有關的責任、要求及安排(不論強制或自願性質)：
 - (a) 現在或將來於香港特別行政區(「香港」)境內或境外存在的任何法律、法規、判決、法院命令、自願守則、制裁制度(「法律」)(例如稅務條例及其條文，包括有關自動交換財務帳戶資料)；或
 - (b) 現在或將來於香港境內或境外存在的任何法律、監管、政府、稅務、執法或其他機關，或金融服務供應商的自律監管或行業組織*或協會所提供或發出的任何指引、指導或要求，及任何國際指引、內部政策或程序(例如稅務局所提供或發出的指引或指導，包括有關自動交換財務帳戶資料)；或
 - (c) 對滙豐集團整體或任何部分具有司法權限的本地或外地法律、監管、司法、行政、公營或執法機關，或政府、稅務、稅收、財政、證券或期貨交易所、法院、中央銀行或其他機關，或金融服務供應商的自律監管或行業組織*或協會或彼等的任何代理(統稱及各稱「權力機關」)向本公司或任何滙豐集團成員施加的、與彼等訂立的或適用於彼等的任何現在或將來的合約或其他承諾；或
 - (d) 權力機關之間的任何協議或條約；

*包括保險公司的任何協會、聯會或類同組織(「聯會」)

 - 1.8 遵守滙豐集團為符合制裁、預防或偵測清洗黑錢、恐怖分子融資活動或其他非法活動的任何方案就於滙豐集團內共用資料及資訊及／或資料及資訊的任何其他使用而指定的任何責任、要求、政策、程序、措施或安排；
 - 1.9 採取任何行動以遵守本公司或任何滙豐集團成員的責任以符合與下述事宜有關的法律或國際指引或監管要求：偵測、調查及預防清洗黑錢、恐怖分子融資活動、賄賂、貪污、逃稅、欺詐、逃避經濟或貿易制裁及／或規避或違反有關此等事宜的任何法律的任何行為或意圖；
 - 1.10 遵守本公司或任何滙豐集團成員的責任，以符合權力機關的任何指令或要求；
 - 1.11 行使本公司或滙豐集團成員就向客戶提供的產品或服務享有的任何權利；及
 - 1.12 把本公司或滙豐集團成員持有有關資料當事人的任何資料為任何本第1段所述的用途不時進行核對。
2. 本公司會把持有有關個別人士的資料保密，但本公司可能會提供有關資料予下列各方(不論於香港境內或境外)作上述第1段所述的用途，但任何有關提供資料予他方作銷售或推廣用途則受限於以下第4段：
 - 2.1 任何滙豐集團成員；
 - 2.2 滙豐集團的任何代理、承包商、次承包商、服務供應商、再保人或聯營人士(包括彼等的僱員、董事、職員、代理人、承包商、服務供應商及專業顧問)；
 - 2.3 任何就本公司業務運作向本公司提供行政、電訊、電腦、付帳或證券結算或其他服務的第三者服務供應商(包括彼等的僱員、董事及職員)；
 - 2.4 本公司或代本公司可能委任的醫院、診所、醫療從業員、化驗所、技術人員、理賠師、法律顧問或私家調查員；
 - 2.5 本公司的任何實際或建議承讓人或受讓人，或本公司的權益的參與人或附屬參與人；
 - 2.6 任何權力機關；

- 2.7 任何對本公司有保密責任的人士，包括就有關資料對本公司承諾保密的滙豐集團成員；
- 2.8 有關售賣或轉讓本公司或任何滙豐集團成員的全部或部分業務或產品、保單或其他資產組合，或任何有關該項售賣或轉讓的建議或已確定交易的任何其他人士；
- 2.9 第三者金融機構、承保人、銀行、信用卡公司、證券及投資服務供應商；
- 2.10 第三者獎賞、長期客戶或優惠計劃供應商或商號；
- 2.11 慈善或非牟利機構；
- 2.12 本公司就以上第1.4段所述的用途而委任的任何服務供應商(包括但不限於寄件中心、電訊公司、電話促銷及直銷代理、電話中心、資料處理公司及資訊科技公司)；
- 2.13 現存或不時成立的任何聯會或任何聯會的會員，以達到任何第1.4段所述或有關的用途；
- 2.14 本公司或任何滙豐集團成員就上述第1.7、1.8、1.9或1.10段所載目的而有責任或必須或被預期向其作出披露或與其使用資料的任何人士；
- 2.15 代表個別人士行事提供該個別人士資料的任何人士、收款人、受益人、戶口代名人、中介人、往來及代理銀行、結算公司、結算或交收系統、市場交易對手、上游預扣稅代理、掉期或交易儲存庫、證券交易所、客戶擁有證券權益的公司(如該等證券由本公司或任何滙豐集團成員持有)，或代表客戶的人士，或為獲取保單利益而其資料被提供的個別人士；及
- 2.16 就或有關收購保單權益或接受或承擔保單風險的交易或潛在交易的任何交易方，包括但不限於再保險公司。有關資料可能轉移至香港境外。
3. 本公司亦可能由聯會從保險業內收集的資料中查閱及／或核對資料。
4. 本公司擬把資料當事人的個人資料用於直接促銷，而本公司為該用途須獲得資料當事人同意(包括表示不反對)。就此，請注意：
- 4.1 本公司可能把本公司不時持有的姓名、聯絡資料、產品及服務組合資料、交易模式及行為、財務背景及人口統計數據用於直接促銷；
- 4.2 促銷可包括下列類別的產品、服務及標的：
- (a) 保險、銀行、信用卡、金融、公積金計劃及相關的產品及服務；
- (b) 獎賞、長期客戶或優惠計劃及相關的產品及服務；及
- (c) 為慈善及／或非牟利用途的捐款及捐贈；
- 4.3 上述產品、服務及標的可能由本公司及／或下列各方提供或(就捐款及捐贈而言)徵求：
- (a) 滙豐集團成員；
- (b) 第三者金融機構、承保人、銀行、信用卡公司、證券及投資服務供應商；
- (c) 第三者獎賞、長期客戶或優惠計劃供應商或商號；
- (d) 慈善或非牟利機構；
- 4.4 除由本公司促銷上述產品、服務及標的以外，本公司亦擬將以上第4.1段所述的資料提供予恒生銀行集團的其他成員公司，以供該等人士在促銷該等產品、服務及標的中使用，而本公司為此用途須獲得資料當事人書面同意(包括表示不反對)。
- 如資料當事人不希望本公司如上述使用其資料或將其資料提供予恒生銀行集團的其他成員公司作直接促銷用途，資料當事人可通知本公司行使其選擇權拒絕促銷。
5. 資料當事人有權要求查閱及更正任何由本公司持有其資料。根據條例規定，本公司有權就處理任何資料查閱的要求收取合理費用。有關資料查閱或資料更正的要求，或獲取資料政策及實務或資料種類資訊的要求，可致函香港德輔道中83號，傳真：(852) 2868 4042，向恒生保險有限公司資料保護主任提出。

2014年6月(於2016年12月更新)

註：中文本與英文本如有歧義，概以英文本為準。