

## **PRIVACY POLICY**

In the following Privacy Policy, “Us”, “We”, “Our”, “AVA” refers to “AVA Insurance Brokers Pte Ltd” and/or any affiliates, related corporations and branches. “You”, “Your”, “Yours” refers to the person to whom this policy applies to.

Your privacy is important to us. We recognize our responsibilities in relation to the collection, usage, disclosure, storage and transfer of personal data under the Personal Data Protection Act (“PDPA”). We recognize the importance of the personal data that you have entrusted to us and will properly manage, protect and process your personal data. When you register with us, we ask for some of your personal data as we need it to better service you. As such your personal data is important to us and keeping it safe and secure is a top priority.

This policy is designed to help you better understand how we may collect, use, disclose, store and transfer your personal data. This policy applies to any individual’s personal data which is in our possession or under our control and all our employees are required to comply with our Privacy Policy when they carry out their daily activities. Please take a moment to familiarize yourself with our privacy practices and contact us via the contact information below if you have any questions.

Should the personal data that you have entrusted to us not be your own, you confirm that you have obtained the consent of the individual/entity to whom the personal data belongs to, for the collection, use, disclosure, storage and transfer of such personal data by AVA and AVA Authorised Parties.

You agree that you will not use any personal data made available on the platform for:

- Any purpose, activity, and/or manner that is criminal, illegal and/or actionable.
- Marketing purposes unless given expressed written consent.
- Any purpose that the individual/entity has not been notified of and consented to.
- The preparation and compilation of personal data for, your own use, distribution in any manner or form to any unauthorised third party.
- The enhancement, verification, supplementation, modification, amendment and/or confirmation of any compilation of personal data that is meant to be distributed to any third party.

## PERSONAL DATA WE COLLECT

“Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access.

Personal data that is collected about you and your dependents may include:

- **General information and Contact information:**

Examples include, name, address, telephone number, age, date of birth, gender, family and marital status and occupation.

- **Government issued Identification Numbers:**

Examples include, NRIC, Passport, FIN number and vehicle registration number

- **Financial information and account details:**

Examples include, salary, assets, liabilities, properties, credit card number, bank account number and account details.

- **Medical and Health information:**

Examples include, health status, injury or disability information, medical procedures performed, personal habits (smoking, drinking, etc) and medical history.

- **Other information enabling us to provide our products and services:**

Examples include, previous insurance and claims experience, employment information, driving record and travel arrangements.

## PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

**Your personal data may be used for our core business purposes such as:**

- Considering whether to provide you with the insurance you applied for.
- Processing your application for underwriting and insurance.
- Identifying you.
- Administering and managing your relationship, account and policy with AVA.
- Processing and/or dealing with any claims including the settlement of claims and any necessary investigations relating to the claims under your policy/policies.
- Carrying out due diligence or other screening activities (including background, anti-money laundering (AML), “know-your-client” checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by AVA.
- Carrying out any instructions or responding to any enquires made by you.

- Conducting research, analysis and development activities (including but not limited to data analytics, surveys (such as insurance survey, customer service survey), product and service development and/or profiling) to improve our services or products and/or to enhance the product or service for your benefit.
- Dealing in any matters relating to the services and/or products which you are entitled to under any policy with us and/or dealing in any matters relating to any policy with us, which you are applying for or have applied. This includes but is not limited to contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your contractual relationship with us such as but not limited to communicating with you on matters related to your policy with us. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages.
- Investigating fraud, misconduct, any unlawful action or omission, whether relating to your application, your claims or any other matter relating to your policy or policies.
- Coach employees and monitor for quality assurance.
- Storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore.
- Complying with applicable law in administering and managing your relationship with AVA.
- If you have so consented, sending you marketing, advertising and promotional information about other insurance, investment and/or financial products and/or services that AVA may be selling or marketing, whether now or in the future, and which we believe may be of interest or benefit to you (the “Marketing Purpose”), by way of the modes of communication as consented by you.
- Any other purposes which we notify you of at the time of obtaining your consent.

(collectively called “purposes”)

As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third-party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third-party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

## USE OF COOKIES

We may also receive and store certain types of information whenever you interact with us on our platform. Using “cookies”, which are small text files placed on your computer by websites, we are able to collect non-personal information such as your IP address, browser type, domain names, access times and referring website addresses.

We use the information collected for the following purposes:

- Keeping count of return visits to our platform or our advertisers’ or strategic partners’ websites;
- Accumulating and reporting anonymous, aggregate, statistical information on our platforms and advertisement usage;
- Determining which features on our platform that users like best;
- Saving your password so you do not have to re-enter each time you visit our platform.
- The cookies used on our website will not collect your personal information unless you specifically provide us with the information. You may opt to disable cookies or prevent your browser from accepting new cookies through your browser settings.
- If you choose not to allow us to place a cookie on your device, this may restrict your ability to perform certain transactions, use certain services or access certain content on our platform.

## THIRD PARTY ADVERTISEMENT SERVERS

Some of our advertisers use third-party companies to serve their advertisements on our platforms, and in some cases, in our HTML-formatted newsletters. Often, these third-party advertising companies employ cookies and web bug technologies to measure advertisement effectiveness. We do not disclose any personal, identifiable information to them as part of this relationship. Use of their tracking technology is subject to their own privacy policies. We are not responsible for the privacy practices of these third parties and you should refer to their privacy policies to find out about their practices.

## EXCEPTIONS FOR THE DISCLOSURE AND SHARING OF PERSONAL DATA TO THIRD PARTIES

We will not disclose your personal data to third-parties without first having obtained your consent. However, we may disclose your personal details to third parties without first obtaining your consent in certain situations. These situations include but are not limited to:

- When disclosure is required or authorized based on applicable laws and regulations.
- When such disclosure is clearly in your interest and consent cannot be obtained in a timely way.
- When the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual.
- When it is necessary for any investigations or proceedings.

- When it is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer.
- When it is to a public agency and such disclosure is necessary in the public interest and/or disclosure without your consent is permitted by PDPA or by law.

The instances mention above are not exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

When your personal data is disclosed, best efforts will be made by us to require such third-parties to protect your personal data.

### REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

You may request access to your personal data held by AVA and know how it is being used and disclosed for the last 12 months to the extent your right is allowed by law. We may charge a fee for processing your request for access and such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.

You also have the right to request correction of your personal data.

### WITHDRAWING CONSENT

You may refuse or withdraw your consent for use to collect, use, disclose and process your personal data by giving us reasonable notice so long as there are no contractual or legal ramifications of doing so.

However, withdrawing consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us/ and the policy or policies you have with us will have to be terminated.

### ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

AVA will make reasonable effort to make sure that your personal data is accurate and complete. However, this means you must update us of any changes in your personal data that we were originally provided with. We will not be held liable for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had originally provided us with.

We will also set measures in place that ensure that your personal data in our possession is destroyed and/or anonymized once it is reasonable to assume that, (1) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (2) retention is no longer necessary for any other legal or business purposes.

Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## CONTACT US

If you have any concern, query or complaint about our personal data protection policies and practices or wish to request access to, update or correct your personal data, please contact:

Email: [dpo\\_brokers@ava-ins.com](mailto:dpo_brokers@ava-ins.com)

## UPDATES TO THIS POLICY

AVA reserves the right to make changes at any time to take into account of changes in our business and legal requirements without prior notice.