

Privacy Notice

We, MSIG Insurance (Malaysia) Bhd Registration No. 197901002705 (46983-W) ("**MSIG**") are firm in our commitment to protect and safe-guard the privacy of your Personal Data. This privacy notice ("**Notice**") outlines what kind of personal data we collect from you, how we process your personal data, why we collect and process and to whom disclosure is made. This Notice also contains information on how you could access your Personal Data.

This Notice is issued in compliance with section 7 of the Personal Data Protection Act 2010 (the "**Act**"). MSIG also stand guided by the Code of Practice on Personal Data Protection for the Insurance and Takaful Industries in Malaysia (the "**Code**") registered by the Personal Data Protection Commissioner on 23 December 2016.

For the purpose of this Notice, the following words shall have the following meanings:

- "Personal Data"** means any information in respect of commercial transactions, that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject.
- "Sensitive Personal Data"** shall include an individual's mental or physical health or condition, his political opinion, religious beliefs, commission or alleged commission of any offence or biometric data.

Other defined terms shall have the meaning ascribed to it in the Code.

What do we collect from you?

Your Personal Data is collected from various sources including proposal form, application form and any other relevant forms, whether captured in physical forms, online forms or via marketing or telemarketing exercises, our communications with you, etc.

Personal Data which we collect from you are necessary and mandatory and if you fail to provide us with your Personal Data, it may not be possible for MSIG to provide you with the insurance products and/or services. The types of Personal Data we might collect and process include but is not limited to:

Non-sensitive Personal Data

- your name and age
- home/mailling address
- NRIC No/passport number
- contact information such telephone number/email address
- photograph or video image of an individual
- employment information
- financial information
- vehicle registration numbers
- personal data of family members or next of kin
- personal data of beneficiaries or nominees relevant to the processing of insurance claims, the provision of insurance and related products and services
- expression of opinion
- such other personal data with your consent

Sensitive Personal Data

- thumbprint or DNA profile
- physical and/or mental health condition
- religious belief
- commission or alleged commission of any offence or contravention of any laws at any point of time
- such other sensitive personal data required with your consent

Why do we collect your Personal Data?

MSIG collects and uses your Personal Data for the following purposes ("**Purposes**") (which includes but not limited to):

1. handling applications to purchase insurance policies and/or requests for advice and product recommendations;
2. preparing, issuing and handling other administrative matters relating to the insurance policies certificates;
3. collecting premiums/contributions and submitting other bills;
4. processing and settling claims and paying other benefits;
5. regular assessment after purchase of insurance;
6. re-insurance;
7. co-insurance;
8. preventing, detecting, investigating and/or prosecuting actual or suspected insurance fraud and other criminal activities;
9. establishing, exercising or defending a legal claim;
10. meeting other specific legal or contractual obligation;
11. prospecting new insurance markets, including research for product and service development;
12. internal management;
13. disclosure to third parties as provided for under the Disclosure Principle in the Code and the Act;
14. audit, risk assessment, research, survey, statistical and analytical studies relating to the insurance business;
15. discharging regulatory or legislative obligations;
16. actuarial activities;
17. information sharing for the upholding of professional standard of Insurance Intermediaries in Malaysia and for the protection of consumers by preventing the appointment of unethical Insurance Intermediaries, or Insurance Intermediaries who have committed acts of misconduct or fraud, or have engaged in unethical practices, in the insurance industry, as registered with each of the INSURANCE ASSOCIATIONS, including the sharing of this information between the ASSOCIATIONS as agreed by the Joint Insurance Takaful Council;
18. the identification, prevention, deterrence and investigation of any actual or suspected insurance fraud or conspiracy claim against Insurers or which may cause a fiscal threat to the insurance industry for the protection of consumers;
19. the compliance with any guidelines, circulars or directives issued by the PDP Commission, BNM or any other applicable authorities;
20. cooperating with the PDP Commission, BNM or any other applicable authorities to conduct an audit, examination or investigation which is authorised under any applicable Malaysian laws;
21. the conduct of insurance business and the provision of general insurance or related products and/or services arising or relating thereto;
22. variation, cancellation or renewal of insurance products;
23. performance of obligations including customer service under a written agreement, complaints handling, conservation where such agreement shall include but not be limited to life insurance, general insurance, group insurance policies, agency contract, broking arrangements, and employment contract;
24. investigation during underwriting and claims assessment or at any time during the concurrence of the insurance policy that is necessary and reasonable to identify any possible non-disclosure

- of material information in an insurance fraud or conspiracy claim;
25. preventing, detecting, prosecuting, investigating, reporting or otherwise in relation to actual or suspected money laundering, terrorist financing, bribery, corruption, actual or suspected fraud including but not limited to insurance/takaful fraud, tax evasion, evasion of economic or trade sanctions, and criminal activities generally or other unlawful activities;
26. compliance with the requirements of any law, any regulations or guidelines, any present or future contractual or other commitment with any legal, regulatory, judicial, administrative, public or law enforcement body, whether in or outside Malaysia, that are issued by regulatory or other authorities with which MSIG need or are expected to comply;
27. cooperating with the PDP Commission, BNM or any other relevant authority to conduct an audit, examination or investigation which is authorised under any applicable Malaysian laws or international treaties/agreements affecting MSIG, whether directly or through the group of companies to which MSIG belongs;
28. matching personal data held in relation to a data subject for the Purposes;
29. performance of obligations under any lawful scheme of transfer of business;
30. cooperating or assisting in investigations undertaken by another Insurer or any of the INSURANCE ASSOCIATIONS;
31. conducting investigation on any Insurance Intermediaries and their third-party service providers for any allegation of fraud, conspiracy, breach of any laws, rules and regulations, codes of practice including the Code, misconduct or any unethical behaviours or practices;
32. information sharing with any of the INSURANCE and TAKAFUL ASSOCIATIONS and any information-sharing systems
33. processing of any credit, security, underwriting checks and insurance claims in relation to MSIG's insurance products and/or services;
34. exercising any right of subrogation by MSIG;
35. marketing of general insurance products or services or related products or services by MSIG, its affiliates or partners provided that such marketing is done in accordance with the Act and the Code;
36. compliance with disclosure requirements imposed by law or any regulatory authorities on MSIG, its affiliates or partners; and/or
37. the daily operation and administration of services and facilities in relation to the insurance products and/or services provided to you.

Disclosure to 3rd Parties

In the course of providing insurance products and/or services to you, MSIG may outsource some of the regulator-approved functions and activities to service providers such as data processing, call center, mailing services and data storage. Such service providers are imposed with strict confidentiality and data security standards that MSIG practices.

For clarity, these are the classes of persons to whom we may need to disclose your Personal Data and who may be located outside of Malaysia:

1. individuals or organizations within MSIG's group of companies or another insurer's group of companies, strictly on a need-to-know basis;
2. bancassurance partners, third party outsourcing service providers, third party call centres, insurance intermediaries including agents, independent insurance brokers or financial advisers;
3. reinsurers or retrocessionaires;
4. credit bureaus, credit reporting agencies or corporations for the purpose of credit checks and evaluation as well as debt recovery;
5. claims investigation companies or loss adjusters or surveyors or other parties for administration of insurance claims;

6. relevant government authorities, law enforcement agencies, courts, tribunals, regulatory bodies and/or statutory agencies or bodies or any other person where MSIG is under an obligation or required or expected to make disclosures for the purposes set out in paragraphs 8.6(e), (f) and (g) of the Code;
7. industry associations and federations;
8. doctors, medical specialists, hospitals clinics or healthcare institutions;
9. MSIG's internal and external auditors, consultants, lawyers, accountants, fund managers and other professional advisors appointed to provide services or in connection to MSIG's business on a strictly confidential basis;
10. banks, credit card companies or other financial institutions for the purposes of collection, refund or payment of any monies due or payable;
11. any person permitted by you or as the case may be, your named beneficiaries or nominees, appointed executor, administrator or legal personal representatives;
12. information-sharing systems for the purposes of enabling exchange of information between insurers in order to facilitate fraud prevention and detection;
13. any person to whom disclosure is necessary for the purpose of investigation into any allegation of insurance intermediaries including agent and third-party service providers' breach of any laws, rules and regulations, codes of practice including the Code, misconduct or unethical behaviours or practices;
14. any person to whom the disclosure is necessary for the purposes of investigations under any law, criminal or civil proceedings or any pursuant to a court order; and/or
15. any other third-party service providers appointed to provide administrative, telecommunications, payment, data processing, data storage or other services to MSIG and/or member(s) of MSIG's group of companies for the Purposes stated herein, including Paragraphs 8.5 and 8.6 of the Code.

Your Rights

Under the Act, you have the right to request access to and to request correction of your Personal Data. You may do so by completing an online access and/or correction form at www.msig.com.my or by writing to the Data Protection Officer at the address stated below.

You also have the right, by written notice to MSIG requiring MSIG to stop processing your Personal Data or process your Personal Data for a specific purpose or in a specified manner so that the processing does not cause you any unwarranted substantial damage or distress or to limit the processing of your Personal Data, including personal data relating to other persons who may be identified from that Personal Data. However, where MSIG's obligations to provide insurance products and/or services are affected, MSIG would not be in the position to stop processing your Personal Data as per your request.

Security and Retention of your Personal Data

MSIG ensures that all Personal Data collected shall be stored and/or filed in such manner so as to ensure that the Personal Data maintains its accuracy, integrity, remains confidential, is protected against loss, misuse, modification and unauthorized access, disclosure, alteration, destruction or manipulation.

All Personal Data is stored or retained only for as long as required for the fulfillment of the Purposes or pursuant to any legal obligation imposed upon MSIG in the course of provision of insurance products and/or services thereof or by virtue of any applicable law that may from time to time be in force.

How to contact MSIG

In the event you have any enquiries or complaints in respect of the processing of your Personal Data or wish to update your Personal Data or rectify any inaccurate or incomplete Personal Data, you may do so by completing the form accessible at MSIG's corporate website at www.msig.com.my or by writing to:

Kelvin Hii Chee Yun | Colleen Cheah Seok Ngae | Richard Lee Weng Hoow

Data Protection Officer

MSIG Insurance (Malaysia) Bhd

Level 15, Menara Hap Seng 2

Plaza Hap Seng

No. 1, Jalan P. Ramlee

50250 Kuala Lumpur

Tel No. 603 2050 8228

Fax No. 603 2026 8086

Email: dpo@my.msig-asia.com

Changes to this Notice

MSIG may amend this Notice from time to time and the updated version supersedes all previous versions. Please do check MSIG's website from time to time for the latest version of this Notice. By continuing to use MSIG's products and services after such changes are made, you shall be deemed to have agreed to and accepted such changes.