

Data Protection Privacy (DPP) Policy for Honan Malaysia

1 General

- 1.1. Honan Group (Malaysia) Sdn Bhd and MP Honan Insurance Brokers Sdn Bhd (collectively/individually as “**Honan Malaysia**” / “we” / “us” / “our”) is committed to protecting the privacy and confidentiality of personal data in accordance with the under **Malaysia’s** Personal Data Protection Act 2010 (“**PDPA**”) seriously. This Personal Data Protection Privacy Policy (“**Policy**”) outlines as well as assists you in understanding how we collect, use, disclose and protect your personal data, it also assists you in making an informed decision before providing us with any of your personal data.
- 1.2. This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.
- 1.3. Customers (“you” or “your”) are to read this Policy carefully and to refer to it as and when required. By interacting with us, submitting information to us in any form (including on or through our website), or signing up for any products or services offered by us, you agree and consent to **Honan Malaysia** as well as its representatives, staff and/or agents, collecting, using, disclosing and sharing amongst themselves your personal data, and disclosing such personal data to our authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.

2 As used in this Policy

- 2.1. “customer” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and
- 2.2. “personal data” means any information in respect of commercial transactions:
 - a) is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;
 - b) is recorded with the intention that it should wholly or partly be processed by means of such equipment; or
 - c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system,

that relates directly or indirectly to an individual, who is identified or identifiable from that information or from that and other information in our possession, including any sensitive personal data and expression of opinion about the said individual; but does not include any information that is processed for the purpose of a credit reporting business on by a credit reporting agency under the Credit Reporting Agencies Act 2010;

In addition, “sensitive data” shall mean any personal data consisting of information as to the physical or mental health condition of an individual, his political opinions, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any

offence or any other personal data as the relevant minister may determine by order published in the Gazette.

- 2.3. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, identification numbers (such as NRIC, work permit, passport, birth certificate or government issued identification number), residential address, email address, telephone number, nationality, gender, date of birth, marital status, medical records, bank account/payment details and employment information.
- 2.4. Other terms used in this Policy shall have the meanings given to them in the **PDPA** (where the context so permits).

3 Collection, Use and Disclosure of Personal Data

3.1 **Honan Malaysia** shall protect each individual's privacy by:

- a) Collecting information fairly and only collecting information that we need to provide insurance services;
- b) Explaining why we are collecting personal information and how we will be using it;
- c) Using personal information only for our business operations and to comply with the law;
- d) Ensuring the personal information we collect and hold is accurate;
- e) Holding personal information only for so long as necessary and keeping it secure;
- f) Sharing personal information only with companies and organisations that will keep it secure;
- g) Not sending personal information abroad without ensuring its security;
- h) Ensuring that all individual rights can be exercised under the data protection legislation;
- i) Ensuring that we comply Honan Group privacy policy, where we are a member of.

3.2 We generally do not collect and process your personal data unless

- a) it is provided to us voluntarily by you directly via interactions with our Website, communications with any of our employees or associates, and/or who communicates with us on our goods and services (including but not limited to events, updates, and/or promotions by us) where that conversations may be recorded for the collection of such personal data if such communication is made via telephone; or
- b) collection and processing of personal data without consent is permitted or required by the **PDPA** or other laws.

We shall seek your consent before collecting any additional personal data and before processing your personal data for a purpose which has not been notified to you (except where it is permitted or authorised by law).

- 3.2 You have choices regarding our collection, processing or disclosure of your personal data. If you choose not to provide us with the personal data described in this Policy, we may not be able to provide our service/products to you. You have the right to object to the processing of your personal data and withdraw or limit your consent in the manner described in clause 9.
- 3.3 Personal data that has been collected will only be used within the required scope to achieve the Purposes of use explained below. In the event of rare and unpredicted events, we shall obtain the customer's permission first, unless it is for one of the following situations:
 - a) prevention or detection of crime or any threat to life or health;

- b) arrest or prosecution of legal offenders;
- c) valuation or assessment of taxes or any other similar payments;
- d) other guidelines or instructions issued by the Ministry responsible for personal data protection or any relevant authority or government body;
- e) to comply with any legal requirements applicable to or imposed on us;
- f) to protect your vital interests;
- g) for the administration of justice; or
- h) for the exercise of any functions conferred on any person by or under any law.

3.4 If you have supplied third party personal data to us, you represent and warrant that you have obtained the consent of the insured person(s) you enrolled, except to the extent such consent is not required under relevant laws:

- a) to collect their personal data;
- b) to disclose their personal data to us; and
- c) we and third parties to use any of their personal data in the manner and for the Purposes described herein.

We do not knowingly solicit or collect personal data from minors below the age of eighteen (18). If we unintentionally done so, we will remove said personal data from our records promptly. However, we may collect and process personal data of a minor below the age of eighteen (18), provided that the customer in question is their parent, ward, or legal guardian that has provided their own consent towards the processing of the same. We may also need to collect and process of the personal data of said customer.

3.5 We may collect and process your personal data for any or all of the following purposes:

- a) the conduct of insurance/takaful business, as licensed under the relevant laws;
- b) the performance of obligations including customer service under a written agreement, complaints handling, conservation, including any value-added services that are connected but not directly connected to such agreement, where such agreement shall include but not be limited to life insurance, general insurance, family takaful, general takaful, medical insurance/takaful, group insurance policies or group takaful certificates, agency contract, broking arrangements, and employment contract;
- c) investigation during underwriting and claims assessment or at any time during the concurrence of the insurance policy/takaful certificate that is necessary and reasonable to identify any possible non-disclosure of material information in an insurance/takaful fraud or conspiracy claim, including but not limited to the purposes of medical/health/life insurance, requesting and verifying information with any medical practitioner, hospital, medical institution or any person (whether incorporated or not) who has ever attended to the customer or has records on the health of the customer; the purposes of motor insurance, requesting and verifying information with any motor companies, workshops, or any person (whether incorporated or not) who has ever attended to the customer or has records on the motor vehicles belonging to the customer; and ourselves and/or our relevant data processors may keep such records for future possible cases of underwriting and claims assessment;
- d) exercising the right of subrogation/recovery;
- e) for the purposes of preventing, 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;

- f) 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 we or any other group members of the Honan Group need or are expected to comply, including but not limited to making any enquiries, any investigation, disclosure or reporting requirements and/or meeting obligations pursuant to such law, regulations guidelines and/or the relevant authorities;
- g) cooperating with the Personal Data Protection Commission, Bank Negara 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 insurers or operators, whether directly or through the Honan Group to which we belong;
- h) marketing (including direct marketing) to any customer of insurance or takaful products, provided that such customer has not given written instructions pursuant to Section 43 of the PDPA on direct marketing, to cease processing his personal data for direct marketing purpose;
- i) matching personal data held in relation to a customer for any purposes contained in this paragraph, specifically but not limited to those as set out at subparagraphs (e), (f), and (g) above;
- j) research, audit purposes and risk assessment/survey, including statistical/actuarial research or data analytics/study. In the event such data was required for this purpose, the customer's personal data are not to be published, and only figures, statistics and general information in the findings of the study/research are to be published;
- k) the performance of obligations under any lawful scheme of transfer of business;
- l) cooperating or assisting in investigations undertaken by another insurer, operator or any of the relevant governing trade associations;
- m) conducting investigation on any insurance/takaful intermediaries and their third-party service providers for any allegation of fraud, conspiracy, breach of any laws, rules and regulations, codes of practices, misconduct or any unethical behaviours or practices;
- n) performing re-insurance/re-takaful;
- o) information sharing with the relevant governing trade associations and any information-sharing systems; and/or
- p) all the other processing operations that are relevant to the provision of our goods and/or services.

(Collectively, the "Purposes")

3.6. We may disclose your personal data to facilitate our business operations and carry out one or more of the Purposes detailed at clause 3.5 above, we may disclose your personal data to third parties whether located in or outside **Malaysia**. These include:

- a) Our associated and related corporations under the Honan Group (collectively, "Group Companies").
- b) when required for performing obligations in the course of or in connection with our provision of the services requested by you; and
- c) to third party service providers, agents (including and not limited to law firms / (re)insurers / advisors and consultants / risk assessors, reinsurers, claim adjusters) and other organisations such as our affiliates whom we have engaged to perform any of the functions with reference to the above-mentioned Purposes.

- 3.7 Please note that by providing your consent under this Policy, you also provide your unconditional and voluntary consent for us to process your sensitive personal data based on the same. In the event that such consent was not provided or subsequently withdrawn, please note that we reserve the right to process such sensitive personal data for the following circumstances without having to obtain such consent:
- a) for the execution or claim of rights or obligation under the law against an individual in the regards of employment;
 - b) to protect the interests of an individual or other person, where the truth cannot be granted by the individual or his representative or is impossible for us to obtain permission in a normal and reasonable manner;
 - c) to protect the interests of an individual or other person, where the permission by the individual or his representative is deliberately not granted;
 - d) for medical purposes - under the custody of a professional in the field of healthcare or a person who has the same confidentiality responsibility with professionals in the field of healthcare;
 - e) for any relevant legal action and to seek legal advice;
 - f) to create, carry or defend the rights under the law and to administer the system of legal justice;
 - g) to carry out any function given to a person by or under the law;
 - h) other purposes perceived by the Ministry responsible for personal data protection; or
 - i) the information contained in personal data has been publicly known as a result of an individual's actions and in such instance, we will not be required to obtain the individual's permission in respect of such personal data.
- 3.8 We may change the Purposes of use as described above in the event of reasonable and relevant requirements catering to the purpose of the original use. In such a situation, we will notify the affected customers in advance and obtain the permission of each individual customer regarding the change in the terms concerning the usage of personal data on the website or other platforms such as via e-mail or paper correspondences.

4 Accuracy of personal data

- 4.1 We make all reasonable efforts to ensure that your personal data is accurate and complete. We generally rely on personal data provided by you (or your authorised representative).
- 4.2 In order to ensure that we hold accurate personal data, you must update us in a timely manner as and when required if there are any changes to your personal data that you have provided to us.
- 4.3 If you fail to do so, we will not be responsible to you for relying on inaccurate or incomplete personal data provided to us and in relation to which you have not notified us of any required amendments.

5 Protection of personal data

- 5.1 To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.

- 5.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

6 Retention of personal data

- 6.1 We put in place commercially reasonable measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable that:
- a) the Purpose for which that personal data was collected is no longer being served by the retention of such personal data; and
 - b) retention is no longer necessary for any legal or business purposes, including adherence to the **PDPA**.

7 Transfer of Personal Data

- 7.1 Generally, all your personal data will be processed by us in **Malaysia**. In certain situations, we may transfer your personal data to a third party locally or to a country outside of **Malaysia** for the above Purposes such as Group Companies, third party service providers, agents and/or affiliates appointed by us to perform functions with reference to the abovementioned Purposes and governmental/regulatory authorities, courts and/or dispute resolution forums which has jurisdiction over us or our Group Companies. By providing your consent for to us to process your personal information, you also agree that we shall be entitled to transfer and store your personal data with such aforementioned third party who may be based outside Malaysia.
- 7.2 If your personal data is to be transferred out of **Malaysia**, we will take appropriate steps to ensure that the overseas recipient organisations of the personal data provide the standard of protection that is at least comparable to the protection under the **PDPA**.

8 Access and correction of personal data

- 8.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 8.2 We will endeavour to provide you with the relevant information within twenty-one (21) days from the date of receiving your request. If we are unable to respond to your request, we will notify you before the expiry of the said twenty-one (21) days, of the earliest time when we can provide you with the requested information.
- 8.3 We will charge you a reasonable fee to process your request. Depending on the nature and complexity of your request, we will set out the details of the fee payable, prior to providing you with the requested information. We will not respond to your request unless you have agreed to pay the reasonable fee.

- 8.4 In the event of a correction, we will correct your personal data within twenty-one (21) days from the date of receiving a valid correction request. If we are unable to correct our records within twenty-one (21) days, we will notify you before the expiry of the said twenty-one (21) days, as to the earliest time when we are able to make the correction.
- 8.5 In the event that we do not respond to you once the time period of twenty-one (21) days has expired, you shall be entitled to have the request (for either access or correction) be complied in full within fourteen (14) days by us, from the date of expiry of the aforementioned twenty-one (21) day period.
- 8.6 Please note that the **PDPA** exempts certain types of personal data from being subject to your access or correction request. It also specifies the situations where a correction may not be made by us despite your request.

9 Withdrawing/limiting your consent

- 9.1 The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn or limited by you in writing. You may withdraw or limit consent and request us to stop collecting, processing and/or disclosing your personal data for any or all of the Purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
- 9.2 Upon receipt of your written request to withdraw or limit your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us.
- 9.3 Whilst we respect your decision to withdraw or limit your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal or limitation of consent, please inform us in writing in the manner described in clause 9.1 above.

10 Cookies

- 10.1 Whenever you interact with us on our websites, we may receive and store certain types of information via “cookies”. The “cookies” are small text files placed on your computer or electronic devices by our website.
- 10.2 Through the “cookies”, we are able to collect and analyse non personal data such as your IP address, browser type, domain names, access times, pages browsed, time spent per webpage, traffic monitoring, user experience, website performance and to remember your preferences.
- 10.3 If we collect your personal data through cookies, we will notify you and seek your consent to the same.
- 10.4 You may choose to disable the cookies by altering the browser settings on your computer. However, by doing so, you may not be able to use certain services, perform certain transactions or browse certain parts of our website.

10.5 Your use of our website constitutes consent by you to our use of cookies.

11 Third party websites

11.1 Our website may contain links to websites operated by third parties. We will not be responsible for the data protection practices of the third parties' websites even though such websites may be co-branded with our logo or trademark.

12 Data Protection officer (DPO)

12.1 You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Personal Data Protection Officer
No. 25-3, The Boulevard Office, Mid Valley City,
Lingkaran Syed Putra, 59200 Kuala Lumpur
Email: DPO@Honan.com.sg

13 Effect of the Policy and changes to the Policy

13.1 This Policy applies in conjunction with any other notices, contractual clauses, and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

13.2 Notwithstanding what has been provided above, we may from time to time update this Policy without any prior notice to ensure that this Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time on our website. Please check back regularly for updated information on the handling of your personal data.

Effective date: 1 August 2023

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