

## **PRIVACY STATEMENT**

### **Purpose of the Privacy Notice**

This Privacy Notice addresses how your personal information is collected, used, processed, and disclosed by COFAP in compliance with the Personal Data Protection Act 2010 ("PDPA") as well as applicable data protection laws and regulations.

### **Personal Information**

We collect personal information through various means including through this website in the course of our business dealings with you. "Personal Information" is information that identifies and relates to you or other individuals related to you.

### **Personal Information That We Collect**

The Personal Information we may collect about you and individuals related to you depends on your relationship with us. These may include:

- Identification and contact information

Name, address, e-mail address, telephone details, gender, marital status, date of birth, passwords, educational background, physical attributes, records, such as driving records, photos, employment history, skills and experience, professional licenses and affiliations, relationship to the participant, person covered or claimant, and date and cause of death, injury or disability.

- Identification numbers issued by government bodies or agencies

National registration card number, Employee Provident Fund number, passport number, tax identification number, military identification number, or driver's or other license number.

- Financial information and account details

Payment card number, bank account number and account details, credit history and credit score, assets, income and other financial information.

- Sensitive information

Your medical condition and health status – Current or previous physical or mental or medical condition, health status, injury or disability information, medical procedures performed, personal habits (for example, smoking or consumption of alcohol), prescription information and medical history.

We may receive other sensitive information about your religious beliefs, ethnicity, political opinions, family medical history or genetic information in some cases. We may also obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud. We may also receive sensitive information if you voluntarily provide it to us.

- Telephone recordings

Telephone call recordings to our staff, representatives or contact centers.

- Information enabling us to provide products and services

Location and identification of property covered (for example, property address, vehicle license plate or identification number), travel plans, age, categories of individuals you wish to cover, certificate and claim numbers, coverage/peril details, cause of loss, prior accident or loss history, ownership or management interest in an organization, and other protection or financial assistance product(s) you may hold.

- Marketing preferences and customer feedback

You may inform us of your marketing preferences, enter a contest or prize draw or other sales promotion, or respond to a customer satisfaction survey.

### **How We Use Personal Information**

We use this Personal Information to:

- Communicate with you and others as part of our business.
- Send you important information regarding changes to our policies, other terms and conditions, the website and other administrative information.
- Make decisions about whether to provide financial assistance, including claim assessment, processing and settlement, and, where applicable, manage claim disputes.
- Assess your eligibility for COFAP program and process your contribution and other related payments.
- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).
- Prevent, detect, analyze, manage and investigate crime, including fraud and money laundering and other commercial risks.
- Carry out market research and analysis, including satisfaction surveys.
- Provide marketing information to you (including information about other products and services offered by selected third-party partners) in accordance with preferences you have expressed.
- Personalize your experience on our website and other digital platforms by presenting information and advertisements tailored to you.
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these carefully.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing, finance and accounting, billing and collections, IT systems, data and website hosting, business continuity, and records, document and print management.
- Resolve complaints, and handle requests for data access or correction.
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-

terrorism, comply with legal process, and respond to requests from public and governmental authorities (including those outside your country of residence).

- Establish and defend legal rights, protect our operations or those of any related business partners, our rights, privacy, safety or property, you or others, and pursue available remedies or limit our damages.

### **How We Collect Personal Information**

COFAP collects personal information via various channels and mediums. The usual channels by which we do so are when:

- you request a quotation for our products;
- you submit application to COFAP for the participation in our products;
- you submit a claim form or other forms related to our products and services;
- you interact with us via telephone, e-mails or other means of communication with us;
- you interact with any of our agents or representatives;
- you respond to our request for additional personal data;
- you access our website to access your product-related information or perform an online transaction;
- you interact with our customer service officers;
- you are contacted by, and respond to, our telemarketers;
- you participate in any of our contests or promotions.
- you access software applications made available by use for use on or through computers and mobile devices; and/or
- you visit our social media pages, and other social media content, tools and applications.

### **Disclosure of Personal Information**

COFAP may disclose your Personal Information for the purposes of the above and make available of the Personal Information within the relevant parties, strictly on a need-to-know basis to:

- Companies within the VSure Tech Group

Access to Personal Information within Group is restricted to those individuals who have a need to access the information for marketing or our business purposes.

- Other stakeholders and distribution parties

In the course of marketing and providing benefit coverage, processing claims and facilitating fraud prevention and detection, COFAP may make Personal Information available to third parties such as other operators or insurers, retakaful operators or reinsurers, takaful or insurance and retakaful or reinsurance brokers and other intermediaries and agents, appointed representatives, distributors, affinity marketing partners, and financial institutions, securities firms and other business partners.

- Our service providers

External third-party service providers, such as medical professionals, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors, travel and medical assistance providers, call center service providers, breakdown assistance, IT systems, support and hosting service providers, printing, advertising, marketing and market research and analysis service providers, banks and financial institutions that service our accounts, third-party claim administrators, document and records management providers, claim investigators and adjusters, construction consultants, engineers, examiners, translators, and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

- Governmental authorities and third parties involved in court action

COFAP may also share Personal Information with governmental or other public authorities (including but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies), and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence, (b) to comply with legal process, (c) to respond to requests from industry associations and federations and public and government authorities, including public and government authorities outside your country of residence, (d) to enforce our terms and conditions, (e) to protect our operations (f) to protect our rights, privacy, safety or property, you or others, and (g) to allow us to pursue available remedies or limit our damages.

- Other authorized third parties

We may share Personal Information with payees, emergency providers (fire, police and medical emergency services), retailers, medical networks, organizations and providers, travel carriers, credit bureaus, credit reporting agencies, and other people involved in an incident that is the subject of a claim, as well as purchasers and prospective purchasers or other parties in any actual or proposed reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock.

### **We Require Your Consent**

When applying for our products and services, you will be required to provide your Personal Information to us for the purpose of obtaining coverage with us. With this consent it is deemed that you have given consent (including explicit consent to personal information of other individuals related to your certificate) for the related processes above. Failing to provide the required Personal Information, we will not be able to provide coverage or services to you.

### **Personal Information of other individuals**

If you provide Personal Information to COFAP regarding other individuals, you agree: (a) to inform the individual about the content of this Privacy Notice, and (b) to obtain any legally-required consent for the collection, use, disclosure, and transfer (including cross-border transfer) of Personal Information about the individual in accordance with this Privacy Notice.

### **Security**

COFAP will take appropriate measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system

can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been compromised), please immediately notify us.

When COFAP provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

### **Retention of Personal Information**

COFAP takes reasonable steps to ensure that the Personal Information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this Privacy Notice. COFAP will retain Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

### **Marketing Preferences**

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you. You can contact us at [TO BE CONFIRMED] or write to the address stated at the bottom of this Privacy Notice to tell us your marketing preferences whether to opt-in or opt-out.

We aim to comply with your opt-out request(s) within a reasonable time period. Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of third parties with whom we have already shared your Personal Information. Please also note that if you do opt-out of receiving marketing communications from us, we may still send you other important administrative communications from which you cannot opt-out.

### **Access and Correction Requests, Questions and Concerns**

You have the right to access and correct your Personal Information. Please contact us at [TO BE CONFIRMED] with any such requests or if you have any questions or concerns about how we process Personal Information. Please note that some Personal Information may be exempt from access or correction in accordance with local privacy and data protection laws.

### **Other Information We Collect Through the Website**

“Other Information” is any information that does not reveal your specific identity, such as:

- Browser information;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you; and
- Aggregated information.

We and our third-party service providers may collect Other Information in a variety of ways, including:

- Through your internet browser: Certain information is collected by most websites, such as your IP address (i.e., your computer’s address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, time of the visit and the page(s) visited. We use this information for

purposes such as calculating website usage levels, helping diagnose server problems, and administering the website.

- Using cookies: Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognize your computer and to collect information such as internet browser type, time spent on our website, pages visited, language preferences. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting our website, or to gather statistical information about the usage of our website. Cookies further allow us to present to you the advertisements or offers that are most likely to appeal to you. We may also use cookies to track your responses to our advertisements and we may use cookies or other files to track your use of other websites.
- From you: Some information (for example, your location or preferred means of communication) is collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then, in addition to the uses listed in the “Other Information We Collect” section above, we may use and disclose Other Information for all the purposes for which we use and disclose Personal Information.

### **Third party Websites**

This Privacy Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which this website contains a link. The inclusion of a link on the website does not imply endorsement of the linked site by us.

### **Changes to this Privacy Notice**

We review this Privacy Notice regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website.

Please take a look at the “LAST UPDATED” date at the bottom of this Privacy Notice to see when it was last revised.

### **How to Contact COFAP**

For any inquiries on this Privacy Notice, complaints, Personal Information access, correction or change of your Personal Information request, please contact COFAP at the following details:

[TO BE CONFIRMED]