AXA Global Healthcare (EU) Limited Data Privacy Policy

This Data Privacy Policy tells you what data we collect, why we collect it and what we do with it. You can also find information on the controls you have to manage your data within these pages.

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AXA Global Healthcare (EU) Limited is committed to ensuring your privacy and personal information is protected. For the purposes of this Data Privacy Policy, references to "**we**" or "**us**" shall refer to AXA Global Healthcare (EU) Limited. AXA Global Healthcare (EU) Limited is the data controller of your personal information for the purposes of arranging your insurance contract and is responsible for complying with data protection laws.

Where you have provided information to us about a third party who has consented to you doing so on their behalf (such as a named party on your insurance), this Data Privacy Policy should be brought to their attention.

By providing your personal information to us or on behalf of another party, you acknowledge that we may use it in the ways set out in this Data Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time we may need to make changes to this Data Privacy Policy, for example, as the result of government regulation, new technologies or other developments in data protection laws or privacy generally. You should check the AXA – Global Healthcare website at www.axaglobalhealthcare.com/en/about-us/privacy-and-legal/ periodically to view the most up to date Data Privacy Policy.

1. Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below, keep it safe and will never sell it.

1. Personal information you provide is processed fairly, lawfully and in a transparent manner
2. Personal information you provide is not processed in a way which is incompatible with the purpose for which we collected it
3. The personal information we request is adequate, relevant and limited to what is necessary for the purposes for which it is processed
4. Your personal information is kept accurate and where necessary kept up to date
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed
6. We will take appropriate steps to keep your personal information secure
7. Your personal information is processed in accordance with your rights
8. We will only transfer your personal information to another country or an international organisation where we have taken steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards

9. We do not sell your personal information and we also do not permit the selling of customer data by any company which provides services to us
10. We endeavour to be transparent and clear with the way we use your personal information

2. How do we collect your personal information?

While there are a number of ways in which we collect your personal information, the two main ways we might collect personal information about you are from things you tell us yourself and from things we ask other people or organisations to share with us. Things you tell us could include conversations we have on the phone, what you've written on an application form or if you post something on one of our websites. We might also collect information about you from other people and organisations,. Please see below for a list of ways we may collect your personal information:

We collect personal information directly from you:

- via enquiry and registration forms;
- via feedback forms and forums ;
- when you purchase any of our products or services;
- when you fill out a survey or vote in a poll on our website;
- through quotes and application forms;
- via cookies. You can find out more about this in our cookies policywww.axaglobalhealthcare.com/en/about-us/cookie-policy/ ;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline;

We may also collect your personal information from a number of different sources including:

- directly from an individual who has a policy with us under which you are insured, for example you are a named dependant on your spouse's health insurance policy;
- where you are a member of a group arrangement, the sponsor of the arrangement e.g. your employer
- from social media where fraud is suspected
- via third parties including:
    - your family members, where you may be incapacitated or unable to provide information relevant to your policy;
    - aggregators;
    - third parties such as companies who provide consumer classification for marketing purposes e.g. market segmentation data

3. What personal information do we collect?

We might collect personal information such as your contact details or information about your bank or credit cards. The information we collect depends on which product or service you're interested in. For medical insurance we may ask you about you or your families' medical history. Please note, in certain circumstances we may request and/or receive special categories of personal information about you. For example, we may need access to health records for the purposes of providing you with a policy. The information that we collect will depend on our relationship with you.

Where other people are named on your policy we may also ask you to provide the information detailed below in relation to those people.

We may collect the following information about you:

- Personal information
    - contact details such as name, email address, postal address and telephone number
    - details of any other persons included on your policy and the relationship to you as policyholder
    - lifestyle and social circumstances, for example; your interests, such as whether you play a sport, and number of dependents
    - identification information such as your date of birth, national insurance number, passport and driving licence
    - financial information such as bank details, credit card details
    - information obtained through our use of cookies. You can find out more about this in our cookies policy www.axaglobalhealthcare.com/en/about-us/cookie-policy/ details of any financial sanction that may apply to you
    - your marketing preferences

- Special categories of personal information:
    - details of your current or former physical or mental health
    - details concerning sexual life or sexual orientation, for example marital status
    - details regarding criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions, bankruptcies and other financial sanctions such as County Court Judgements,)

- Children's personal and sensitive information

- We do not collect and record personal and sensitive information about children (individuals under the age of 13) without the consent of the child's parent/ guardian.

4. How do we use your personal information?

We mainly use your personal information to provide you with an insurance policy and to provide you with the right services based on your situation. There are a number of other reasons why we use your personal information, please see below

Management Information

We use your personal information to help us understand our business and monitor our performance, for example, to help determine how much insurance premiums should be.

If you are a member of a group scheme, we may provide reports to your employer or a parent company on the performance of the scheme and on the health of the workforce. The information we provide is anonymised which means you cannot be identified from the information.

Analytical purposes and to improve our products and services

We may use your personal information for research and statistical analysis including general research into health-related areas and research about the products and services we provide. By analysing information provided we can tailor and improve our products to better suit our customer's needs.

Where possible, we will anonymise such information. Where this this is not possible for any reason we will obtain your consent before using your personal information.

To prevent, detect and investigate fraud

To help keep premiums and costs down we work with other insurers, healthcare providers, anti-fraud bodies and law enforcement agencies to protect ourselves, the local healthcare providers and our policyholders from fraudulent behaviour and medical malpractice. This may mean disclosing personal information, including health information, to these bodies. In some cases, we provide your personal information to insurance fraud databases, such as that run by the Health Insurance Counter Fraud Group, which are accessible by some or all of these bodies.

In some cases, we are required by law to report crime and suspected crime and other matters to law enforcement and government agencies. .

If false or inaccurate information is provided to us and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering and we will periodically search records held by fraud prevention agencies to;

- help make decisions on insurance policies and claims for you and your dependants;
- trace people who owe money, recover debt, prevent fraud and to manage your insurance policies;
- check your identity to prevent money laundering;
- carry out electoral roll searches and further fraud searches.

5. A Legal Basis for processing

In accordance with UK and EU data protection regulations we must have good reason to use and process your personal information. This is called a legal basis. The table below sets out the legal basis we rely on for each use of your personal information.

Why we need your personal information	Personal information we may process(may include but is not be limited to):	Legal Basis for Processing
To review your insurance application and/or provide you with. To communicate with you and resolve any complaints you may have. For our own management information purposes including managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice. We also undertake measures to secure our system and to ensure the effective operation of our systems.	Your contact details, your age and gender, and the age and gender of other person(s) included on the policy (family members, business partners, employees). Information about your travel plans, destination, planned activities, dates of travel. Special categories of personal data such as personal information about your health or family members' health.	Legal basis: such use is necessary in order to provide your insurance policy Special condition for special categories of personal data: for substantial public interest purposes which includes collection of health data for the provision of insurance. Special condition for special categories of personal data: For Trust business -you have provided your consent (please note that if you do not provide your consent, in some cases, we may not be able to administer your Trust) and/or it is in your

Providing improved quality, training and security.		vital interests.
To prevent, detect and investigate fraud	Information about you, your name, address, email address and contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Information about your travel plans, destination, planned activities, dates of travel. Special categories of personal data such as personal information about your health or family members' health	Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business need to prevent fraud Legal ground for special categories of personal information: we need to use your personal information for reasons of substantial public interest to prevent and detect fraud.
For the purposes of debt recovery (where you have not paid for your insurance policy).	Information about you, your name, address, email address, contact details and bank account details	Legal ground: we have a legitimate business need to recover any debt. Legal grounds for special categories of personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights.
For analytical purposes and to improve our products and services.	Information about you, your name, address, email address and contact details, your age and the age of other person(s) included on the policy (family members, business partners,	Legal ground: we have a legitimate business need to use your personal information for services improvement

	employees). Information about your travel plans, destination, planned activities, dates of travel.	
Complying with our legal or regulatory obligations	Details about you, other related parties, your product, service or benefit, depending on the nature of the obligation	Legal ground: such use is necessary for us to comply with our legal or regulatory obligations
Providing marketing information to you (including information about other products and services and undertaking customer surveys) in accordance with preferences you have expressed	Your name, contact details, marketing preference	Legal ground: we have your consent

6. Who do we share your personal information with?

We might share your personal information with two types of organisation – companies inside the AXA Group, and other third parties outside the AXA Group. For further details of all disclosures, please see below. We will not share any of your personal information other than for the purposes described in this Data Privacy Policy. If we share anything outside the AXA Group, it will be kept strictly confidential and will only be used for reasons that we have agreed with you in advance.

Disclosures within the AXA Group

In order to provide our services your personal information is shared with other companies in the AXA Group including, but not limited to AXA Insurance dac, AXA PPP healthcare Limited, AXA Assistance, AXA Business Services and AXA PPP healthcare Administration Services Ltd. Your personal information might be shared for our general business administration purposes.

Disclosures to third parties

We may also disclose your information to the third parties listed below for the purposes described in this Data Privacy Policy. This might include:

- Your relatives, guardians (on your behalf where you are incapacitated or unable) or other people or organisations connected to you such as your insurance broker, or your lawyer
- Your current, past or prospective employers
- Our insurance partners such as brokers, insurers, reinsurers or other companies who act as insurance distributors
- Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers
- Our suppliers and providers of goods or services that we make available to you
- Financial organisations and advisers
- Central and local Government (for example if they are investigating fraud or because we need to contact them regarding international sanctions)
- Regulatory authorities such as, in the UK, the Financial Conduct Authority or the Information Commissioner's Office
- Complaint arbitration services such as, in the UK, the Financial Services Ombudsman
- Other financial services companies, healthcare provider fraud teams, the UK General Medical Council, the police or other law enforcement agencies and organisations that maintain anti-fraud or other crime databases where reasonably necessary for the prevention or detection of crime
- Selected third parties in connection with the sale, transfer or disposal of our business

Disclosure of your personal information to a third party outside of the AXA Group will only be made where the third party has agreed to keep your information strictly confidential and may only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or a relevant request from a regulator (for example, in the UK, the Financial Conduct Authority); or
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

Some of the recipients set out above may be outside of the UK notably in Switzerland, where AXA has a European Data Centre, and India, where some policy administration is undertaken. Where we make a transfer of your personal information we will take the required steps to ensure that your personal information is protected. Such steps may include placing the

party we are transferring information to under contractual obligations to protect it to adequate standards.

7. Data transfer across borders

The collection of information and its processing prior to transfer are subject to the national laws where it is collected and/or where the data subject is located, and conditions for or restrictions on its transfer according to those laws are respected by AXA Global Healthcare (Eu) Limited. We aim to comply with several local and international laws and regulations, such as Regulation (Eu) 2016/679, Privacy Act 1974, ARPA, uS-Eu Privacy Shield, etc.

8. Data access across borders

We provide medical insurance services on a global scale. Customer data can be accessed in various national jurisdictions in order to service the policy or process a claim. We ensure that the organisations and individuals accessing the data comply with our security standards and are subject to contractual obligations for non-disclosure and data protection. Where required to do so we will obtain your consent prior granting access to your data across international borders.

9. How long do we keep records for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Data Privacy Notice and to comply with our legal and regulatory obligations. The period varies depending on the nature of the personal information and what we do with it, as well as our regulatory obligations. We typically keep quote information for up to 3 years, and policy and claims records for up to 7 years from the end of our relationship with you. In some cases, such as if there is a dispute ora legal action, we may be required to keep personal information for longer.

10. Your rights

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked, or explain why we can't - usually because of a legal or regulatory issue.

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests**.** Your

personal information will usually be provided to you electronically, unless otherwise requested.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete however, if you believe that any of the personal information we hold is incorrect, please let us know so that we can update or amend it.

The right to erasure

In certain circumstances you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However this will need to be balanced against other factors, for example there may be legal and regulatory obligations which mean we cannot comply with your request. Please note that if we erase your personal data we may not be able to process your insurance policy. This may result in the cancellation of your policy where our ability to administer your policy appropriately has been prejudiced by erasure of your personal information.

Right to restriction of processing

You are entitled to ask us to stop using your personal information. If you request that we restrict processing of your personal data we may not be able to process your insurance policy or administer your Trust . This may result in the cancellation of your policy where our ability to administer your policy appropriately has been prejudiced by erasure of your personal information.

Right to data portability

Where you have purchased your policy online, you have the right to ask that we transfer any personal information that you have provided to us as part of that process to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

Right to object to direct marketing

You can ask us to stop sending you marketing messages at any time. Please see section 11 for more information.

Right not to be subject to automated-decision making

You have the right not to be subject to decisions that are made automatically by inputting your personal information into a system or computer rather than made by our employees.

The only automated decision made by us relates to the calculation of your premium when you purchase a policy online.

Deciding your premium

We use the personal information that you and others provide to us about you your family, , where you live, your policy claims history and other non-personal information such as hospital costs to determine your premium and eligibility. The price also depends on what options you have chosen to purchase. We also use information about how long you have been a customer, how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

Fraud prevention

We use automated anti-fraud filters that check against lists of people known to have undertaken fraudulent transactions and will reject those applicants on the basis they are likely to defraud the company.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your insurance claim or your Trust claim if you withdraw your consent.

The right to lodge a complaint

You have a right to complain to the Information Commissioners Office in the UK or the relevant Data Protection government body in the country you reside at any time if you object to the way in which we use your personal information. More information can be found on the Information Commissioner's Office website: https://ico.org.uk/. Please see a list of other national commissioners and their contact details in the Appendix.

You can make any of the requests set out above using the contact details provided to you in your policy handbook or alternatively, as set out in section 12. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. We will always respond to any request you make and if we can't comply with your request we will tell you why.

11. Marketing

We would like to keep you informed from time to time about relevant products and services. Depending on your preferences, we may do this by mail, email, telephone or other electronic methods such as text message.

We may occasionally run specific marketing campaigns through social media and digital advertising which are based on general demographics and interests.If you do not want to see any campaigns, then you will need to adjust your preferences within social media settings and your cookie browser settings.

We are committed to only sending you marketing communications that you are interested in receiving. To help us understand the specific products and services that may interest you we sometimes rely on information obtained from third parties inside and outside the AXA Group, including information from cookie vendors (for more information, please see our Cookie Policy) and targeted marketing platforms.

You are in control of how we use your information for marketing. If you wish to unsubscribe from our marketing communications, you may do so at any time by clicking on the "unsubscribe" link that appears in all emails. Otherwise, you can always contact us to withdraw your consent or update your preferences by using the details provided to in our marketing communications or your policy handbook. If you are a customer, we may need to continue to send you service related (non-marketing) communications.

If you begin the process of obtaining a quote on our website, we may retain certain information provided to us even if you did not complete your quote. Where you consent, we may use this information to enquire as to why you did not complete your quote and better understand your needs.

12. AI Systems

Artificial Intelligence (AI) is an umbrella term for a range of technologies that replace manual processes and solve complex tasks by carrying out functions that previously required human action. Tasks that we have traditionally done by thinking and reasoning are increasingly being done by, or with the help of, AI.

We use AI to support our existing activities, including our claims management. For example, we use AI to automatically translate some medical invoices and index relevant documents under your customer records. This allows us to manage claims more efficiently compared to doing these processes manually.

13. Contact details of the Data Protection Officer

If you wish to contact the Data Protection Officer the details are below:

The Data Protection Officer :
AXA Global Healthcare (EU) Limited
International House,
Forest Road
Tunbridge Wells
TN2 5FE
England

Email address: aghprivacy@axa.com