

Personal Information Collection Statement (Direct Marketing Campaigns)

1. Throughout this Personal Information Collection Statement (Direct Marketing Campaigns) (this “Statement” or “PIC Statement”) and the Foreign Tax Reporting and Withholding Obligations Statement (the “Tax Obligations Statement”), certain words and phrases have defined meanings as follows:

“Campaign”	means any telemarketing or direct marketing campaign as promoted and carried out by the Company from time to time;
“Company”	means Heng An Standard Life (Asia) Limited;
“Company's group”	means Heng An Standard Life Insurance Company Limited registered in People’s Republic of China (registered number 120000400008883) having its registered office at 18F, Tower II, The Exchange, 189 Nanjing Road, Heping District, Tianjin, People’s Republic of China, 300051 together with its subsidiaries (including but not limited to the Company), subsidiary undertakings and associated companies (whether direct or indirect) from time to time and a “member of the Company’s group” shall be construed accordingly;
“Consenting Person”	means the Eligible Participant of any Campaign who has consented to the use of his/her Personal Information for the specified purpose(s) in connection with the respective Campaign (including direct marketing purpose), insofar that the consent remains validly given by virtue of the consent having been re-instated or has otherwise never been withdrawn;
“Compliance Obligations”	means obligations of the Company or of any other members of the Company's group to comply with: (a) any applicable local or foreign law, ordinance, regulation, demand, guidance, rules, codes of practice, whether or not relating to an intergovernmental agreement between the governments or regulatory authorities of two or more jurisdictions; and (b) any agreement between the Company (or that of any other member of the Company's group, as the case may be) and any government or taxation authority in any jurisdiction;
“data subject”	means, in relation to personal data, the individual (not being a corporate person) who is the subject of the data, and all such individuals as a whole shall be referred to as “data subjects”;
“Eligible Participant”	means any individual who is eligible to participate in any Campaign at the time, and has successfully registered to the respective Campaign, based on the terms and/or conditions of the respective Campaign.
“Hong Kong”	means the Hong Kong Special Administrative Region of the People's Republic of China;
“PDPO”	means the Personal Data (Privacy) Ordinance, Chapter 486 of the Laws of Hong Kong; “personal data” means (as defined in the PDPO) any data:

	(a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and in a form in which access to or processing of the data is practicable;
"Personal Data"	means (as defined in the PDPO) any data: (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.
"Personal Information"	in respect of a Consenting Person, subject to the relevant categories of personal data specified for collection and use in respect of each Campaign, means his/her full name, date and place of birth, residential address, mailing address, contact information (including telephone number, email address, etc.), geographical location, national or passport identification number;

2. Nothing in this Statement shall limit the right of Eligible Participants as data subjects under the PDPO.

3. Use of Personal Data in Direct Marketing in respect of any Campaign

The Company intends to use the Personal Information of Eligible Participants, subject to the selected categories of Personal Information specified for collection and use in respect of any Campaign ("Campaign-specific Personal Information"), for the purpose of direct marketing as specified in the respective Campaign ("Campaign-specific Direct Marketing"), and the Company requires their consent (including an indication of no objection) for the purpose. In this connection:

- (a) information delivered by post, electronic mails, SMS, telephone calls, and/or other means of communication may be used by the Company in achieving its Campaign-specific Direct Marketing purpose;
- (b) the classes of service, product and subject in relation to the Company's Campaign-specific Direct Marketing may include:
 - (i) insurance services and/or products of the Company;
 - (ii) investment, financial planning, asset and wealth management and related services and/or products of third party providers;
 - (iii) any other services and/or products of third party providers; and/or
 - (iv) reward, loyalty, privilege and/or special-offer programs of the Company and/or third party providers;
- (c) the classes of service, product and subject described above may be provided or solicited by the Company and/or (where expressly provided for in respect of the Campaign in question):
 - (i) third party financial institutions, investment firms, investment advisers and investment service providers; and/or
 - (ii) third party providers of other services and/or products;
 whether they are in or outside of Hong Kong, subject to the restrictions or prohibitions of the laws of Hong Kong;
- (d) in addition to carrying out Campaign-specific Direct Marketing of the classes of service, product and subject described above for and by itself, the Company also intends to provide the Campaign-specific Personal Information of Eligible Participants to all or any of the persons described in paragraph 3(c) above for use by them in marketing and/or providing those classes of service, product and subject to the Eligible Participants as specified in the respective Campaign, and the Company requires the consent of those Eligible Participants (including an indication of no objection by them) for such purpose;

- (e) if an Eligible Participant does not wish to allow the Company to use or provide to other persons any of his/her personal data for direct marketing purpose, the Eligible Participant can exercise his/her right of objection and notify the Company at any time after giving his aforesaid consent by indicating his/her intention to opt-out from direct marketing of the Company (the 'Opt-Out'), and to request for the deletion of his/her Personal Data, together with any information or records created in the course of any direct marketing initiatives conducted with the Eligible Participant pertaining to his/her Personal Data, from the records of the Company and/or the Company's business partners described in paragraphs 3(c) (if applicable); and
- (f) notwithstanding the Eligible Participant's decision to Opt-Out as described in paragraph 3(e), the Eligible Participant may be permitted to enjoy or continue to enjoy the Campaign-specific Offers that are provided, being provided or to be provided to the Eligible Participant after the Opt-Out comes into effect, subject to:
 - (i) the terms and conditions of the respective Campaign restricting or permitting such enjoyment; and/or
 - (ii) the Eligible Participant's agreement (whether expressly or impliedly) not to withdraw his/her consent, as originally provided in respect of the Campaign, for the provision and use of the specified categories of his/her Personal Data required for the continuous enjoyment of the Campaign-specific Offers.

4. Use of Personal Data for the provision of gifts, rewards or benefits, etc.

The Company intends to use the Personal Data of Eligible Participants to provide the aforesaid Eligible Participants with services, products and activities offered as gifts, rewards or benefits, etc. in relation to any Campaign ("Campaign-specific Offers"). In this connection:

- (a) the classes of services, products and activities pertaining to the Campaign-specific Offers may include:
 - (i) insurance, investment, financial planning, asset and wealth management and related services and/or products;
 - (ii) any other services and/or products;
 - (iii) lucky draw, games, media event and/or seminar; and/or
 - (iv) reward, loyalty, privilege and/or special-offer programs;
- (b) the classes of service, product and subject described in paragraph 4(a)(i)-(iv) above may be provided by:
 - (i) the Company;
 - (ii) third party insurance intermediaries and providers, financial institutions, investment firms, investment advisers and investment service providers; and/or
 - (iii) third party providers of other services and/or products; whether they are in or outside of Hong Kong, subject to the restrictions or prohibitions of the laws of Hong Kong;
- (c) The purposes for which the Personal Data of Eligible Participants may be used in respect of Campaign-specific Offers will vary depending on the circumstances and their context of collection, but the purposes perceived by the Company (irrespective of whether the purpose may be carried out by the Company itself or by its business partners, as the case may be) may include the following:
 - (i) Where the Campaign-specific Offers comprise of insurance coverage, to assess, evaluate (including the merits and/or suitability of a product or service to an Eligible Participants), process, approve and/or underwrite an insurance coverage, a claim and/or service request from an Eligible Participant arising therefrom, and to provide subsequent and ongoing services to the Eligible Participant in relation to the insurance coverage; and/or
 - (ii) Where the Campaign-specific Offers comprise of other services, products and/or activities, for the provision of the aforesaid services, products and/or activities to the Eligible Participant, including

but not limited to any assessment for eligibility thereof, administrative and/or other matters required in connection with the provision of the aforesaid services, products and/or activities.

5. Use of Personal Data for any other ancillary purpose arising directly or indirectly from any Campaign

The Company may need to use the Personal Data of Eligible Participants to carry out various administrative matters, and comply with various legal and regulatory matters, arising directly or indirectly from any Campaign. In this connection:

- (a) to carry out matching procedures as defined in the PDPO;
- (b) to process a payment or an Eligible Participant's payment instructions and/or direct debit authorisations;
- (c) to verify a Eligible Participant's identity in accordance with any compliance procedures, including those intended to combat terrorist financing, fraud and/or money laundering or otherwise for the purpose of ensuring the Company's Group's Compliance with the Compliance Obligations;
- (d) to maintain an update database of personal data of Eligible Participants;
- (e) to fulfill the disclosure requirements of any Compliance Obligations, laws, legislation, regulations, codes or guidelines as may in present or future and from time to time be applicable to the Company and/or the persons as listed in paragraphs 3 and 4 above to whom the Company had transferred personal data of the Eligible Participant;
- (f) to enable the Company to carry on its normal business and day-to-day operations and to meet its liquidity and solvency requirements according to law; and/or
- (g) to comply with any obligations, requirements, policies, procedures, directives, or guidelines in respect of sharing data and information within the Company's group and/or any other use of data and information in accordance with group-wide compliance procedures.

6. Personal Data of Eligible Participants held by the Company will generally be kept confidential, but the Company may provide, disclose or transfer these Personal Information to the other persons (whether they are in or outside Hong Kong) pertaining to any Campaign-specific Direct Marketing as set out in paragraphs 3 and 4 above.

7. Under and in accordance with the PDPO, a data subject has the following rights:

- (a) to check whether the Company holds data relating to him/her and access to such data;
- (b) to require the Company to correct any data relating to him/her which is inaccurate; and
- (c) to ascertain the Company's policies and practices in relation to personal data and to be informed of the kind of personal data held by the Company; and
- (d) to request the Company not to use his/her data for direct marketing purpose and the Company must then cease the use for that purpose without charge.

8. In accordance with the PDPO, the Company has the right to charge a reasonable fee for processing any data access request.

9. If there is any inconsistency between the English and Chinese versions of this Statement, the English version shall prevail.

Heng An Standard Life (Asia) Limited (662679) is registered in Hong Kong at 12/F., Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong. Authorised by the Insurance Authority of Hong Kong to write Class A, Class C and Class I long term business in Hong Kong.

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