



## **PRIVACY POLICY**

### **GENERAL TERMS**

**Last updated: [21 October 2024]**

### **STATEMENT OF POLICY**

The protection of privacy in relation to personal data is the concern of every person in AXA China Region Insurance Company (Bermuda) Limited (Incorporated in Bermuda with limited liability) / AXA China Region Insurance Company Limited / AXA General Insurance Hong Kong Limited / AXA Wealth Management (HK) Limited (referred to hereinafter as the "**Company**", "**AXA**", "**we**", "**our**" or "**us**"). The Company respects personal data privacy and is committed to fully implementing and complying with the requirements under the [Personal Data Protection Act](#). Personal data will be collected only for lawful and relevant purposes and all practicable steps will be taken to ensure that personal data held by the Company is accurate. The Company will take all practicable steps to ensure security of the personal data and to avoid unauthorised or accidental access, erasure or other use.

The "Mainland China Appendix" (appended to this Privacy Policy) will also apply if you are located in Mainland China.

### **STATEMENT OF PRACTICES**

#### **Information collected when you visit our websites**

When you browse our website, cookies will be stored in your computer's hard drive. The purpose of using cookies is to 1) facilitate the content display and successful redirection to the correct page upon your clicking on the changing banner; and 2) remember that you have visited our website as well as what interested you on our website, such as the pages you viewed.

We do not collect or store any personal data from you under this circumstance. You have a choice not to accept the cookies, but if you do, certain functionality, i.e. banner redirection and certain content display may not be available.

#### **Statistics on visitors to our website**

When you use our website, the Company will record anonymous statistics about your visit and do not collect any information which identifies your personal identity until you in fact decide to buy any of our products. Our service providers make a record of your visit that includes but not limited to IP addresses (and domain names), the types and configurations of browsers, language settings, geo-locations, operating systems, previous sites visited, and time/duration and the pages visited.

Your visit to our website may be recorded for general analysis for website enhancement and optimisation. Anonymous information may be gathered through the use of cookies. These cookies include retargeting cookies and are placed by AXA or by advertising networks that AXA work with. We use these cookies to ensure that the advertising and website content that we serve you, on our site or other websites, is aligned to your browsing habits. For example, to remind you of the products or services you have shown an interest in. These cookies are also used to limit the number of times you may see an



advert/content and to tailor the messaging we serve you. They may also be used for research and to help measure the effectiveness of an advertising campaign.

If you would prefer, you can set your browser to disable cookies or inform you when they are set.

### **Third parties**

We may engage with third parties to provide us with certain analytical services to better understand our visitors, who may use various third party technologies to collect and store anonymous information when you visit our website, and this may include using cookies, web beacons and similar mechanisms to collect information when you click on or move your cursor over their buttons. We may have access to this information to permit us to identify other websites that you have visited that are also associated with that third party. In doing so, however, these third parties do not collect personal data (unless you explicitly provide it to them), and we do not give any personal data to them. These third parties may collect certain non-personally identifiable information such as what web site a visitor came from, your IP address, and what type of browser you are using. These companies may also use non-personally identifiable information during your visits to our website and other websites in order to provide advertisements about goods and services likely to be of greater interest to you, and we do not control the dissemination of these third party cookies, web beacons and similar mechanisms.

### **Links to third party**

Our website may contain links to third party websites. The Company does not provide your personal data to these third party websites. However, the Company has no control over these third party websites. You should review the privacy policies applicable to these third party websites to understand the ways in which these third parties may collect and deal with your personal data.

### **Retention**

The Company ensures personal data is not kept longer than is necessary for the fulfillment of the purpose for which the data is or is to be used.

### **Security**

The Company takes appropriate steps to protect your personal data we collect against unauthorised or accidental access, modification, erasure, loss or use.

Personal data electronically sent to us is protected through encryption controls (a secure means of transmission).

### **Collection of Personal Data**

From time to time it is necessary for the Company to collect your personal data which may be used, stored, processed, transferred, disclosed or shared by us for purposes ("**Purposes**"), including:



1. offering, providing and marketing to you the products/services of the Company, other companies of the AXA Group (“**our affiliates**”) or our business partners (see “Use and provision of personal data in direct marketing” below), and administering, maintaining, managing and operating such products/services;
2. processing and evaluating any applications or requests made by you for products/services offered by the Company and our affiliates;
3. providing subsequent services to you, including but not limited to administering the policies issued;
4. any purposes in connection with any claims made by or against or otherwise involving you in respect of any products/services provided by the Company and/or our affiliates, including investigation of claims;
5. detecting and preventing fraud (whether or not relating to the products/services provided by the Company and/or our affiliates);
6. evaluating your financial needs;
7. designing products/services for customers;
8. conducting market research for statistical or other purposes;
9. matching any data held which relates to you from time to time for any of the purposes listed herein;
10. making disclosure as required by any applicable law, rules, regulations, codes of practice or guidelines or to assist in law enforcement purposes, investigations by police or other government or regulatory authorities in Macau or elsewhere;
11. conducting identity and/or credit checks and/or debt collection;
12. complying with the laws of any applicable jurisdiction;
13. carrying out other services in connection with the operation of the Company’s business; and
14. other purposes directly relating to any of the above.

Please note that if you do not provide us with your personal data, we may not be able to provide the information, products or services you need or process your request.

### **Transfer of personal data**

Personal data will be kept confidential but, subject to the provisions of any applicable law, may be provided to:

1. any of our affiliates, any person associated with the Company, any reinsurance company, claims investigation company, your broker, industry association or federation, fund management company or financial institution in Macau or elsewhere and in this regard you consent to the transfer of your data outside of Macau;



2. any person (including private investigators) in connection with any claims made by or against or otherwise involving you in respect of any products/services provided by the Company and/or our affiliates;
3. any agent, contractor or third party who provides administrative, technology or other services (including direct marketing services) to the Company and/or our affiliates in Macau or elsewhere and who has a duty of confidentiality to the same;
4. credit reference agencies or, in the event of default, debt collection agencies;
5. any actual or proposed assignee, transferee, participant or sub-participant of our rights or business;
6. any government department or other appropriate governmental or regulatory authority in Macau or elsewhere; and
7. the following persons who may collect and use the data only as reasonably necessary to carry out any of the purposes described in paragraphs nos. 2, 3, 4 and 5 of the Purposes specified above: insurance adjusters, agents and brokers, employers, health care professionals, hospitals, accountants, financial advisors, solicitors, organisations that consolidate claims and underwriting information for the insurance industry, fraud prevention organisations, other insurance companies (whether directly or through fraud prevention organisation or other persons named in this paragraph), the police and databases or registers (and their operators) used by the insurance industry to analyse and check data provided against existing data.

For our policy on using your personal data for marketing purposes, please see the section below "Use and provision of personal data in direct marketing".

Transfer of your personal data will only be made for one or more of the Purposes specified above.

### **Use and provision of personal data in direct marketing**

The Company intends to:

1. use your name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background and demographic data held by the Company from time to time for direct marketing;
2. conduct direct marketing (including but not limited to providing reward, loyalty or privileges programmes) in relation to the following classes of products and services that the Company, our affiliates, our co-branding partners and our business partners may offer:
  - a. insurance, banking, provident fund or scheme, financial services, securities and related products and services;
  - b. products and services on health, wellness and medical, food and beverage, sporting activities and membership, entertainment, spa and similar relaxation activities, travel and transportation, household, apparel, education, social networking, media and high-end consumer products;



3. the above products and services may be provided by the Company and/or:
  - a. any of our affiliates;
  - b. third party financial institutions;
  - c. the business partners or co-branding partners of the Company and/or affiliates providing the products and services set out in 2 above;
  - d. third party reward, loyalty or privileges programme providers supporting the Company or any of the above listed entities;
4. in addition to marketing the above products and services, the Company also intends to provide the data described in 1 above to all or any of the persons described in 3 above for use by them in marketing those products and services, and the Company requires your written consent (which includes an indication of no objection) for that purpose.

Before using your personal data for the purposes and providing to the transferees set out above, the Company must obtain your written consent, and only after having obtained such written consent, may use and provide your personal data for any promotional or marketing purpose.

You may in future withdraw your consent to the use and provision of your personal data for direct marketing.

If you wish to withdraw your consent, please inform us in writing to the address in the section on "Data Access and Correction". The Company shall, without charge to you, ensure that you are not included in future direct marketing activities.



### Data Access and Correction

Under the Personal Data Protection Act, you have the right to ascertain whether the Company holds your personal data, to obtain a copy of the data, and to correct any data that is inaccurate. You may also request the Company to inform you of the type of personal data held by it.

Requests for access and correction or for information regarding policies and practices and kinds of data held by the Company should be addressed in writing to:

	Address
Life Insurance	Data Privacy Officer AXA China Region Insurance Company (Bermuda) Limited (Incorporated in Bermuda with limited liability) Avenida do Infante D, Henrique, No. 43-53A, 20 Andar, The Macau Square, Macau
Property & Casualty	Data Privacy Officer AXA General Insurance Hong Kong Limited Avenida do Infante D, Henrique, No. 43-53A, 20 Andar, The Macau Square, Macau
Health & Employee Benefits	Data Privacy Officer AXA China Region Insurance Company (Bermuda) Limited (Incorporated in Bermuda with limited liability) Avenida do Infante D, Henrique, No. 43-53A, 20 Andar, The Macau Square, Macau

A reasonable fee may be charged to offset the Company's administrative and actual costs incurred in complying with your data access requests.

### Enquiries

If you have any queries about our Privacy Policy and Practices, please address to the Data Privacy Officer.

[Personal Information Collection Statement \(Macau\)](#)

[Our Data Privacy Declaration](#)



## Privacy Policy - Mainland China Appendix

Last updated: [21 October 2024]

### 1. Introduction

Our Privacy Policy (as supplemented by this Mainland China Appendix) applies to explain how we collect, store, use, process, transmit, provide, disclose or delete (together, "**Process**") your Personal Data if you are located in Mainland China. For the purpose of this Privacy Policy – Mainland China Appendix, Mainland China excludes Hong Kong, Macau and Taiwan. To the extent that there is any conflict between the General Terms of this Privacy Policy and this Mainland China Appendix, the Mainland China Appendix shall apply.

### 2. Purposes of Processing your Personal Data

- 2.1. "**Personal Data**" means any type of information (recorded via electronic means or otherwise) associated with an identified or identifiable natural person, but excluding information after anonymisation handling. Personal Data may include Sensitive Personal Data.
- 2.2. "**Sensitive Personal Data**" means Personal Data which, if leaked or used illegally, may easily cause harm to the dignity of natural persons, or cause harm to personal or property safety, including biometric information, religious belief, specific identity information, health and medical information, financial account information, individual location tracking information and Personal Data of minors under the age of 14.
- 2.3. **Necessity and impact on individual's rights and interest in Processing Sensitive Personal Data.** You need to carefully consider whether your Sensitive Personal Data should be disclosed to us. It is necessary for you to provide us with such Sensitive Personal Data, so that the Company can provide certain services to you. If you do not provide us with your separate consent, the Company may not be able to provide certain services to you. Specifically, it is necessary that we Process your identification information, health records, driving offences records, marital status, financial background information to consider your insurance application, insurance fees, your claims and other business functions as set out in paragraph 2.4 below.
- 2.4. We may Process your Personal Data (including **Sensitive Personal Data** highlighted in **bold**) for the following purposes:

	<b>Business Functions and Purposes</b>	<b>Sensitive Personal Data Processed</b>	<b>Other Personal Data Processed</b>	<b>General Data</b>

<p>1.</p>	<p>To provide insurance or reinsurance products/services of the Company, our affiliates and our business partners, including processing any applications or requests or transactions made by you for products/services</p>	<p><b>Identification / passport information, driving licence, residential address, health information and records, marital status, bank account data, financial information and background, transaction pattern, information about any past driving offences, minors' Personal Data (if provided to us)</b></p> <p>Third-party information in relation to the policy owner, insured, policy beneficiaries, assignees, trustees and/or third-party payor (as applicable). These information may include <b>identification/passport information and, where applicable, such other Personal Data mentioned above</b></p> <p>For our corporate customers, we collect <b>identification/passport information of authorised signatories and beneficial owners, a beneficial owner's residential address, a company controlling person's tax identification number</b></p> <p>For specific services relevant to you, we may collect <b>information about</b></p>	<p>Name, contact details, correspondence address, products and services portfolio information, and behaviour, gender, date of birth, place of birth, nationality, relationship to the proposed insured, employment and occupation information, income information, education, places where you have stayed for over 6 months, tax residency information, source of funds, payment currency and method, information of your other insurance, habits and participation in hazardous activities, purposes of applying for the product, your vehicle information, drivers of your vehicle under insurance claims records, signature, demographic data held by the Company from time to time</p> <p>Third-party information in relation to the policy owner, insured, policy beneficiaries, assignees, trustees and/or third-party payor (as applicable). These information may include name, name of parent/guardian, signature, relationship with you/ the proposed insured, gender, date of birth, correspondence address, loan information about any collateral security assignments and, where applicable, other</p>
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		<b>estate assets and allocation of estate, grant of probate, letters of administration or court order, information about assets and liabilities</b>	such Personal Data mentioned above  For our corporate customers, we collect Personal Data of authorised signatories, company directors, partners, company beneficial owners or other controlling persons. These data may include name, signature, contact details, date of birth, nationality, position in the company, permanent address and correspondence address, tax residency, role of controlling person of a legal person/trust/legal arrangement, percentage of share in the company
2.	To provide customer support services to you (such as autopay set up, etc.)	<b>Health information and records, bank account data, financial background, credit card data, residential address</b>	Name, contact details including mobile phone number and email address, products and services portfolio information, your communication with us
3.	To process and investigate your insurance claims	<b>Identification/ passport information, health information and records, bank account data, financial background</b>	Name, contact details, gender, date of birth, products and services portfolio information, claim information, police reports
4.	To facilitate autopay of premium collection or autopay of disbursement	<b>Identification/ passport information, bank account data</b>	Name, signature
5.	To undertake fraud prevention procedures	<b>Identification/ passport</b>	Name, contact details, products and services

	and detect or investigate activities that may be violating the Company's policies or applicable laws	<b>information, health information and records, account financial background, residential address</b>	portfolio information, claim information, police reports
6.	To evaluate your financial needs	<b>Bank account data, financial background</b>	Name, contact details, products and services portfolio information,
7.	To design products/services for customers	<b>Financial background</b>	Name, contact details, products and services portfolio information
8.	To conduct market research for statistical or other purposes	<b>None</b>	Name, gender, age, contact details, products and services portfolio information, educational details, employment details, occupation, lifestyle information
9.	To conduct data analytics, profiling, information management and database administration	<b>IP address, web browsing information</b>	Products and services portfolio information, gender, age/age range, educational, employment, lifestyle information
10.	To conduct identity and/or credit checks and/or debt collection	<b>Identification/passport information, account financial background, bank data,</b>	Name, gender, date of birth, contact details, products and services portfolio information
11.	To market products/ services of the Company, our affiliates and our business partners (see "Use and provision of personal data in direct marketing" in the General Terms of Privacy Policy)	<b>IP address, web browsing information</b>	Name (if voluntarily provided by you), contact details (if voluntarily provided by you), products interest and services portfolio information

12.	To identify if you are a prospect or existing customer in any AXA promotions; or newsletter subscription for communication such as gift fulfilments or redemptions	<b>IP address, web browsing information</b>	Name, contact details, products and services portfolio information
13.	To send festive greetings e.g. birthday greetings	<b>None</b>	Name and contact details, date of birth

2.5. Your indication of consent to the Privacy Policy shall not entitle the Company to collect and process **all** Personal Data listed in the table above. The Company shall only collect and process those Personal Data which are necessary to perform and carry out its relevant functions or purposes.

2.6. There are several ways for us to collect your Personal Data, including that the Company may:

- (a) directly collect your Personal Data from you (such as when you apply for insurance or make insurance claims);
- (b) collect your Personal Data from an insurance policy owner (such as where you are the beneficiary, insured person or payor of insurance premium under the relevant policy);
- (c) collect your Personal Data from the reinsured (such as where your Personal Data is held with an insurance company and we provide reinsurance services to such insurance company); and
- (d) from other third parties including our business partners, such as medical service providers (e.g. hospitals or clinics).

2.7. **Cookies.** Please refer to "Information collected when you visit our websites" and "Statistics on visitors to our website" sections in the General Term. The purpose of using cookies is to (a) facilitate the content display and successful redirection to the correct page upon your clicking on the changing banner; and (b) remember that you have visited our website as well as what interested you on our website, such as the pages you viewed. When you browse our website, we may automatically collect certain data from you (which may or may not include Personal Data), including but not limited to IP addresses (and domain names), types and configurations of browsers, language settings, geo-locations, operating systems, previous sites visited, and time/duration and the pages visited via cookies. You may refuse to accept the cookies, but if you do, certain functionality, such as banner redirection and certain content display may not be available. Most web browsers allow some control of most cookies through the browser settings (e.g. refusing or deleting cookies). To find information relating to other browsers, visit the browser developer's website.

2.8. With your prior consent (if required under applicable data protection laws), the Company may market products or services or deliver messages to you based on



your preferences, interests and other personal characteristics. These messages may be marketed or delivered to you by way of letter, email, message service/application, mobile application notification and/or through social media or internet platforms. If you do not wish us to target our marketing based on your personal characteristics or if you wish to opt out from targeted marketing, please inform us in writing to the address in the section on "Data Access and Correction" in the General Terms.

2.9. The Company shall not be required to obtain your consent to Process your Personal Data if any of the following situations applies:

- (a) where the Processing of Personal Data is necessary for the conclusion or performance of a contract to which you are a contracting party, or where it is necessary to carry out human resources management according to lawfully formulated labour rules and lawfully concluded collective contracts;
- (b) where it is necessary to perform a statutory responsibility or obligation, or where your consent is not required under applicable laws, guidelines and standards;
- (c) if it is necessary to respond to a public health emergency, or to protect the life, health or property safety of an individual in case of an emergency;
- (d) where Personal Data is Processed within a reasonable scope to carry out news reporting, public opinion supervision or any other activity for public interest purposes; or
- (e) where the Processing relates to Personal Data published by you or otherwise already lawfully disclosed, within a reasonable scope in accordance with applicable laws.

2.10. In the event that the Company Processes your Personal Data that is collected indirectly from a third party, the Company will require such third party to comply with applicable data protection laws in Processing the Personal Data, and we may require such third party to confirm that (a) it has lawfully obtained the relevant Personal Data from you; (b) it has notified you of the Company's Privacy Policy and other relevant documents and obtained all necessary consent from you for the Processing of Personal Data for the relevant purpose and in accordance with the Company's Privacy Policy; and (c) it will assist the Company to obtain any further consent from you in the case that the Processing of Personal Data by the Company will go beyond the scope of the initial consent obtained.

### 3. Minors' Personal Data

3.1. The Company will only Process Personal Data of individuals under 14 years old with separate consent from their parents or guardians. **If you are under 14 years old, please provide this Privacy Policy to your parents or guardians.** We retain our right to reject providing services to you if we do not have your parents or guardians' separate consent to Processing Personal Data of individuals under 14 years old.

3.2. Where the Company has obtained separate consent from parents or guardians for Processing their minors' Personal Data, the Company will protect and only



Process those minors' Personal Data in the same manner and in the same locations as set out in the Privacy Policy (as supplemented by this Mainland China Appendix). If the parents or guardians refuse to provide separate consent for our Processing of their minors' Personal Data which is necessary, the Company may not be able to provide certain services to their minors. To exercise any data subject rights, raise any inquiries or complaint for minors, please refer to the "Data Subject Rights" section below.

#### **4. Transfer of Personal Data**

##### **Sharing with Third Party Data Controllers**

- 4.1. The Company may from time to time during our provision of services to you transfer your Personal Data to third parties set out in the "Transfer of Personal Data" section in the General Terms of this Privacy Policy, among which some third parties who will Process your Personal Data according to their own purposes and methods of Processing ("**Third Party Data Controllers**"). These Third Party Data Controllers may be located within or outside the Mainland China. We will only transfer and/or disclose your Personal Data to these Third Party Data Controllers upon obtaining your separate consent, and in accordance with applicable data protection laws in Mainland China. Where the Company is jointly Processing your Personal Data with a Third Party Data Controller, we shall ensure that our responsibilities in Processing your Personal Data are clearly and distinctively defined.
- 4.2. You can contact the Company for the relevant information regarding those Third Party Personal Data Controllers, such as their identity, contact information, retention period, location, the processing activities undertaken by them (including types of Personal Data being processed, and the purposes and means of processing), their responsibilities in relation to Processing of your Personal Data and (where applicable) the legal bases for the transfers of your Personal Data to outside of Mainland China. Our contact details are set out in the "Data Access and Correction" section in the General Terms of this Privacy Policy.
- 4.3. For details about exercising your data subject rights with respect to Personal Data shared with Third Party Data Controllers, please see paragraph 7 below.

##### **Transfer to our appointed data processors**

- 4.4. Furthermore, the Company may transfer your Personal Data to third parties appointed by us who only Process your Personal Data according to the purposes and means instructed by us, including any third party set out in the "Transfer of Personal Data" section in the General Terms of this Privacy Policy and who has a duty of confidentiality to the same. Where these data processors are located outside of the Mainland China, we will only transfer and/or disclose your Personal Data to these data processors upon obtaining your separate consent, and in accordance with applicable data protection laws of Mainland China. You can contact the Company for the relevant information regarding these data processors based outside Mainland China and (where applicable) the legal bases for such transfers to outside of Mainland China. Our contact details are set out in the "Data Access and Correction" section in the General Terms of this Privacy Policy.



- 4.5. When the Company shares your Personal Data with any third parties, the Company will strive to ensure (including but not limited to using contractual measures or adopt encryption for transfer to ensure) that such third parties comply with this Privacy Policy and other appropriate confidentiality and security measures that the Company requires them to comply with when using your Personal Data, except for the Personal Data you provide directly to the third parties through the use of their services.
- 4.6. With the continuous development of our business, the Company may engage in mergers, acquisitions, dissolution, liquidation, transfer of assets or similar transactions, and in such cases, (i) the Company shall inform you of information that is required under applicable Mainland China data protection laws; and (ii) your Personal Data may be transferred to any actual assignee or purchaser of all or any part of our (and/or our affiliates') business and/or assets; and our service providers in these situations.

**Transfer to Third Party Data Controllers and our appointed data processors located outside of Mainland China**

- 4.7. Where necessary for the relevant purposes identified above, the Company may transfer your Sensitive Personal Data to Third Party Data Controllers or data processors located outside Mainland China. The Company may not be able to provide certain services to you if we do not carry out such transfer. The Company has adopted contractual and security measures to protect your relevant rights and interests in relation to the transfer. In particular, where required by law, the Company and such Third Party Data Controllers or data processors located outside Mainland China will enter into a data transfer agreement.

**5. Retention and Security of your Personal Data**

- 5.1. The Company and its data processors Process your Personal Data in Hong Kong, Macau, Mainland China, Singapore, Australia, Brazil, Canada, France, Germany, India, Ireland, the Isle of Man, Japan, Mauritius, South Korea, Switzerland, United Kingdom and United States.
- 5.2. Unless required by applicable laws and regulations or with your consent, we will generally retain your Personal Data for 7 years from the last activity or interaction with us. After the end of the retention period, we will delete or anonymise your Personal Data.
- 5.3. In order to ensure the correct use and to maintain the accuracy of Personal Data collected from you, as well as preventing unauthorised or accidental access, disclosure, alteration, loss or other use of Personal Data, the Company has implemented various internal management policies (including physical, electronic and management measures) and various security technologies and procedures based on the classification of Personal Data the Company collects from you. For example:
  - (1) your Personal Data will only be accessed by the Company's personnel on a "need-to-know" basis;
  - (2) the Company ensures that its personnel are regularly trained on data protection matters;



- (3) where required by applicable Mainland China data protection laws and regulations, the Company will encrypt and/or de-identify your Personal Data;
- (4) to mitigate any potential risks of unauthorised Processing of your Personal Data, the Company maintains a security incident response plan; and
- (5) where required by applicable Mainland China data protection laws and regulations, the Company will also seek to inform you and the relevant authorities of any incidents concerning the Personal Data the Company Processes on your behalf.

## 6. Automated Decision Making

- 6.1. **“Automated Decision Making”** means the use of computer programs or algorithms to automatically analyse or assess personal behaviours, habits, interests or hobbies, or financial, health, credit or other status, and make automated decisions based on such analysis or assessment.
- 6.2. From time to time the Company may Process your Personal Data through Automated Decision Making in the following scenarios to the extent permitted by applicable laws and regulations:
  - (a) Processing your AXA ID, date of birth, gender, preferred language, contact phone number, number of child, region, marital status, through Automated Decision Making for the purpose of sending you direct marketing communications and/or push notifications which contain content specifically targeting you;
  - (b) Processing your browser type, device name, operation system, language, access time, browsing history within the Company’s website and mobile application, event history of browser within the Company’s website and mobile application through Automated Decision Making for the purpose of enhancing your browsing experience at our websites and/or mobile applications, and displaying content on our website and/or mobile applications targeting you; and
  - (c) providing your data to our Automated Decision Making service providers, so that they may use Automated Decision Making to place advertisements on our websites which contain content specifically targeting you. Please also refer to paragraphs 4.4 to 4.5 of this Mainland China Appendix for further information.
- 6.3. You have the following rights in respect of Automated Decision Making:
  - (a) where the Company Processes your Personal Data through Automated Decision Making to send direct marketing messages or push notifications to you, you have the right to opt-out from such Automated Decision Making processing; and
  - (b) where the decision made through the Automated Decision Making has a material impact on your personal interest, you also have the right to request for an explanation of such decision, and the right to refuse our Processing through Automated Decision Making.



If you would like to exercise your rights referred to in this paragraph 6.3, please refer to paragraph 7 below.

## **7. Data Subject Rights**

- 7.1. You (or your next of kin or you acting on behalf of your minors) are entitled to exercise the following data subject rights under the applicable Mainland China data protection laws:
- (a) access, copy, (where your Personal Data is inaccurate or incomplete) correct and/or supplement any of your Personal Data held by the Company;
  - (b) restrict or reject the Processing of your Personal Data held by the Company;
  - (c) request deletion or de-registration of your Personal Data which is held by the Company (where the purposes of Processing have been or cannot be fulfilled or are no longer necessary, where the Company ceases to provide the services or the retention period ends, where there is a breach of applicable law in the Company's Processing or otherwise required by applicable law);
  - (d) withdraw your consent to the Company Processing your Personal Data;
  - (e) request the Company to transfer your Personal Data to another organisation, if such transfer is permitted by applicable laws;
  - (f) the rights set out in paragraph 6.3 above in respect of Automated Decision Making; and
  - (g) request that we explain the Company's rules on Processing of your Personal Data.
- 7.2. If you wish to exercise any of the rights in paragraph 7.1 above, and raise any inquiries or complaints, please contact our relevant Data Privacy Officer. Contact details are set out under "Data Access and Correction" in the General Terms.

To the extent permitted by relevant laws and regulations, the Company reserves the right to (i) refuse unreasonable requests (for example, requests which infringe the privacy of others); and (ii) charge a reasonable fee for the cost of processing any request set out in paragraph 7.1 above.

## **8. Updates to this Privacy Policy**

- 8.1. This Privacy Policy may be updated from time to time. You may check the most updated Privacy Policy on our website.