



**Insuright Brokers**

保宜保險經紀集團



Member of The Hong Kong  
Confederation of Insurance Brokers  
香港保險顧問聯會會員

## **INSURIGHT PERSONAL INFORMATION COLLECTION STATEMENT**

Customers expect us to maintain their information accurately, protected against manipulation and errors, secure from theft and free from unwarranted disclosure. Insuright Employee Benefits Ltd (“Insuright”) recognizes its responsibilities in relation to the collection, holding, processing or use of personal data.

The provision of your personal data is voluntary: you may choose not to provide us with the requested data, but failure to do so may inhibit our ability to do business with you.

This statement provides you with notice as to why your personal data is collected, how it is intended to be used, to whom your personal data may be provided to and how to access, review and amend your personal data.

### **Why we collect your personal data and how it may be used?**

Personal data is collected for the following purposes:

- Processing, administering, implementing and effecting the requests or transactions contemplated in this document or any other documents you may submit to us from time to time;
- Designing new or enhancing existing products and services provided by us;
- To communicate with you including to send you administrative communications about any account you may have with us or about future changes to this Personal Information Collection (“PIC”) statement;
- For statistical or actuarial research undertaken by Insuright, the financial services industry or our respective regulators;
- For our data matching, internal business and administrative purposes;
- To assist in law enforcement purposes, investigations by police or other government or regulatory authorities and to meet requirements imposed by law or agreed to with government or regulatory authorities;
- Other purposes directly relating to any of the above.

For our policy on using your personal data for promotional or marketing purposes, please see the section entitled “**Use of Personal Data for Direct Marketing Purposes**”.

### **Who may be provided with your personal data?**

Personal data will be kept confidential but may, where such disclosure is necessary to satisfy the purpose or a directly related purpose for which the personal data was collected, provide such personal data to the following parties (for our policy on sharing of your personal data for promotional and marketing purposes, please see the section entitled “**Use of Personal Data for Direct Marketing Purposes**”):

- Any person authorized to act as an agent of Insuright for the distribution of products and services offered by Insuright;
- Any agent, contractor or third party service provider (within or outside Insuright) who provides administration, data processing, telecommunications, computer, payment, debt collection or securities clearing, technology outsourcing, call centre services, mailing and printing services in connection with the operation of Insuright’s business and provision of our services to you;
- Any member of Insuright, including subsidiaries and affiliates;



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- Agents, contractors or third party service providers (within or outside Insuright) including companies to help deliver our services, such as insurance companies, investment management companies, claims investigation companies, industry associations or federations;
- Other companies who help gather your information or communicate with you, such as research companies and ratings agencies, in order to enhance the services we provide to you; and
- Government or regulatory bodies or any person to whom Insuright is to make disclosure: (a) under a legal and/or regulatory obligation in that jurisdiction applicable to Insuright; or (b) which Insuright has agreed to make disclosures.

From time to time, we may purchase a business or sell one or more of our businesses (or portions thereof) and your personal data may be transferred or disclosed as a part of the purchase or sale or a proposed purchase or sale. In the event that we purchase a business, the personal data received with that business would be treated in accordance with this PIC, if it is practicable and permissible to do so. In the event that we sell a business, we will include provisions in the selling contract requiring the purchaser to treat your personal data in the same manner required by this PIC statement.

**Your personal data may be provided to any of the above parties who may be located in Hong Kong SAR or outside of Hong Kong SAR.**

### **Access Rights to Personal Data**

You have the right to:

- Verify whether Insuright holds any personal data about you and to access any such data;
- Require Insuright to correct any personal data relating to you which is inaccurate; and
- Ascertain Insuright's policies and practices in relation to personal data.

Requests for access, correction or other queries relating to your personal data should be addressed to:

Assistant General Manager  
Insuright Employee Benefits Ltd  
Room 503-6, Alliance Building,  
130-136 Connaught Road C.,  
Hong Kong  
Email: ireb@insubest.com.hk

Insuright has the right to charge costs which are directly related to and necessary for the processing of any personal data access request.

### **Use of Personal Data for Direct Marketing Purposes**

As well as the purposes set out above, Insuright intends to use your name and contact details for promotional or marketing purposes including sending you promotional materials and conducting direct marketing in relation to the following products, services, advice and subjects: insurance; annuities; MPF/ORSO; wealth management; investment; banking; financial services; credit cards; medical/health treatment; educational; recruitment; training; reward/loyalty/privilege programmes; charitable/non-profitable causes; ("Classes of Marketing Subjects").

For the purposes of direct marketing, we may provide your personal information or any of the Classes of Marketing Subjects described above and call centre, marketing or research services so that they can send you promotional materials and conduct direct marketing in relation to the products and services



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they offer (these materials may be sent to you by postal mail, email or other means). We may provide your personal data to providers (whether within or outside Insuright) of any of the Classes of Marketing Subjects for gain.

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

The types of personal data the Insuright intends to use and provide for direct marketing purposes as described above are your name and contact details.

You may in future withdraw your consent to the use and provision to a third party by Insuright of your personal data for direct marketing purposes and thereafter Insuright shall cease to use such data for direct marketing purposes.

If you wish to withdraw your consent, please inform us by writing to the address in the section on "Access Rights to Personal Data" or sending us an email. Any such request should clearly state details of the personal data in respect of which the request is being made.

### **Amendments to this PIC Statement**

Insuright reserves the right, at any time and without notice, to add to, change, update or modify this PIC statement, simply by notifying you of such change, update or modification. If we decide to change our personal data policy, those changes will be notified to you either on our website or in writing so that you are always aware of what information we collect, how we use the information and under what circumstances the information is disclosed. Any such change, update or modification will be effective immediately upon posting.

### **Additional Information**

Should you have any questions on any part of this PIC statement or would like additional information regarding Insuright data privacy practices, please do not hesitate to contact us.

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