

Privacy Policy Statement

Blue Care Medical Services Limited (the “Company”, “we”, “us”, “our”) is a wholly owned subsidiary of AIA Group Limited. AIA Group Limited, together with its subsidiaries and affiliates (collectively referred to in this Privacy Policy Statement as the “AIA Group” and individually referred to as an “AIA Entity”), recognise our responsibilities in relation to the collection, use, disclosure and other processing and storage of personal data.

Among the most important assets of AIA Group is the trust and confidence placed to properly handle information. Customers and potential customers expect us to maintain their information accurately, protected against manipulation and errors, secured from theft and free from unwarranted disclosure. We protect data security of our customers and potential customers by complying with applicable data protection laws and regulations, and ensure compliance by our staff with strict standards of security and confidentiality.

This statement provides you with notice as to how and why your personal data is collected, how it is intended to be used, to whom your personal data may be transferred to, how to access, review and amend your personal data, and our policies on direct marketing and the use of cookies relevant to your use of and interaction with our services, website, apps, social media platforms (if applicable). By using this website, you are accepting the practices and policies in this Privacy Policy Statement. If you object to any practices and policies in this statement, please do not provide your personal information to the Company.

This website is for general information purpose only. While we use reasonable efforts to ensure the accuracy of the information on this website, the Company does not warrant its absolute accuracy or accept any liability for any loss or damage resulting from any inaccuracy or omission. Without prior permission from the Company, no information contained on this website may be copied, except for personal use, or redistributed.

This website, and our social media platforms (if any) are not intended for persons in jurisdictions that restrict the distribution of information by us or use of such website or social media platforms (if any). If this is applicable to you, we would advise you to make yourself familiar with and observe the relevant restrictions, and the Company does not accept liability in this respect.

How do we collect personal data?

We will collect and store your personal data in the following circumstances:

- when you provide information to us directly (for example, when you send us enquiries or communications);
- when you access, interact and use our services, website, apps or social media platforms (if applicable); and
- to the extent permitted by law, when we obtain information about you from our affiliated entities, business partners and other independent third parties' sources.

The personal data we collect (which includes sensitive personal data as defined under applicable laws and regulations), includes the following:

- (i) **Profile information** - including name, address, occupation, contact details, date of birth, nationality, health-related information, identity card number, passport numbers and place and date of issue thereof;
- (ii) **Employment related information** - including current employer, nature of position, medical benefits and benefit usage information;
- (iii) **Medical Data** – including medical history, investigation findings, treatments and prescriptions (“Medical Data”);
- (iv) **Reference on health condition** - including information obtained from a medical professional for a reference on the health condition of customers;

- (v) **Technical information** - including IP address, browser type and version, time zone settings, browser plugin types, operating systems and platform, device information (including where mobile device the IMEI number, wireless networks and general network information); and
- (vi) **Information which is in the public domain.**

If you make use of any social media features or platforms, either on our website, an application we provide, or otherwise through a social media provider, if any, we may access and collect information about you via that social media provider in accordance with their policies. When using a social media feature, we may access and collect information you have chosen to make available and to include in your social media profile or account, including but not limited to your name, gender, birthday, email address, address, location etc. Our access to this information may be limited or blocked based on your privacy settings with the relevant social media provider.

We will usually identify any information which is mandatory when we collect the information from you. You may choose not to provide us with the requested data, but failure to do so may inhibit our ability to provide information and services to you or to respond to your enquiries.

Why do we collect your personal data and how may it be used by the Company?

Personal data is collected by the Company for the following purposes (“Purposes”):

- (i) provision of medical and healthcare services through clinics, doctors, and other medical and healthcare service providers and provision of related products and services (including, without limitation, appointment booking, medical consultation, treatment, processing registrations, requests and enquiries, administration, processing, investigation or analysis of claims, and any functions and activities incidental to the provision of such products and services) (the “Products and Services”);
- (ii) processing billing and payments, insurance claims, and/or collecting amounts due from you;
- (iii) processing your request for registration as a user of the Company’s application, portal and/or website(s) and administering your user account;
- (iv) verifying your identity before providing the Products and Services;
- (v) operating, maintaining, evaluating, improving troubleshooting problems, and understanding your preference(s) with the Company’s application, portal and/or website(s);
- (vi) improving the experience of the Company’s application, portal and website(s) and ensuring the data collection purposes can be fulfilled by collecting information through cookies and other tracking technologies;
- (vii) promotional or marketing purposes, subject to the section entitled “Use and Provision of Personal Data in Direct Marketing”;
- (viii) performing statistical or other research and data analysis related to the provision of the Products and Services;
- (ix) exercising the Company’s rights in connection with the provision of the Products and Services to you from time to time;
- (x) performing evaluation, planning and designing of the Products and Services with a view to improving or enhancing the Products and Services;
- (xi) communicating with you or your authorized representative(s);
- (xii) performing investigations and processing of complaints and disputes;
- (xiii) meeting any disclosure requirements imposed by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations binding on or applying to the Company or the AIA Group or with which the Company or the AIA Group is expected to comply;
- (xiv) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information applicable to us or AIA Group and/or any other use of data and information in accordance with any applicable programs for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;

- (xv) enabling an actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business to evaluate or carry out the transaction intended to be the subject of the assignment, transfer, participation or sub-participation; and
- (xvi) any other purposes relating to any of the purposes listed above.

Unless permitted by applicable laws and regulations, we will obtain consent from you if we wish to use your personal data for purposes other than those stated in this Privacy Policy Statement.

The Company may retain your information for as long as necessary to fulfil the purpose(s) for which it is collected or as otherwise required to ensure compliance with applicable laws and regulations. The Company applies reasonable security measures to prevent unauthorised or accidental access, processing, erasure, loss or use including limiting physical access to data within the Company's systems and encryption of sensitive data when transferring such data. Reasonable steps will be taken to delete or destroy the information when it is no longer necessary for any of the purpose above.

For our policy on use of your personal data for promotional or marketing purposes, please see the section entitled "Use and Provision of Personal Data in Direct Marketing".

Who may be provided with your personal data?

Personal data held by the Company relating to you will be kept confidential but may, where permitted by law or 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, whether inside or outside of Hong Kong to fulfil the Purposes:

- (i) your attending doctors and medical and healthcare service providers;
- (ii) third-party doctors, medical and healthcare service providers or laboratories for purposes relating to your healthcare;
- (iii) staff or academics, and healthcare or educational institutions who are authorised by us for teaching, education, research and/or statistical purposes;
- (iv) any agent, contractor or third party service provider, including but not limited to any service provider within the AIA Group, which provides services to the Company in connection with the operation of its business including administrative, telecommunications, computer, payment, data processing, storage, investigation, debt collection, technology outsourcing, mailing and printing services and other services in connection with the Company's operations, the Products and Services;
- (v) any authorized person or organization in connection with the Products and Services provided by the Company to you (e.g. such as your employer, insurance company (or its service provider) or insurance broker);
- (vi) any other person or entity under a duty of confidentiality to the Company or the AIA Group including AIA Entity which has undertaken to keep such data confidential;
- (vii) the Company's Alliance Program Partners (as defined in paragraph (iii) of the section entitled "Use and Provision of Personal Data in Direct Marketing" and subject to the section entitled "Use and Provision of Personal Data in Direct Marketing");
- (viii) any person or entity to whom the Company or the AIA Group is under an obligation or otherwise required to make disclosure under the requirements of any law, regulations, code of practice, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations binding on or applying to the Company or the AIA Group or with which the Company or the AIA Group is expected to comply, or to establish, exercise or defend or to protect legal claims, to protect the rights, property or safety of the Company or the AIA Group, all of which may be within or outside Hong Kong and may be existing currently and in the future;
- (ix) any actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business;
- (x) third party reward, loyalty, co-branding and privileges program providers;
- (xi) co-branding partners and/or marketing partners of the Company and/or any AIA Entity (the names of such co-branding partners and/or marketing partners can be found

- in the registration form(s) and/or promotional material for the relevant services and products, as the case may be);
- (xii) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and sales agents, data processing companies and information technology companies) that the Company engages for the purposes set out in paragraph (vii) of the section entitled “Why do we collect your personal data and how may it be used by the Company?”; and
 - (xiii) other companies who help gather your information or communicate with you, such as research companies and ratings agencies, in order to enhance the products or services we make available to you.

For our policy on sharing of your personal data for promotional and marketing purposes, please see the section entitled “Use and Provision of Personal Data in Direct Marketing”.

From time to time, AIA Group or the Company may purchase a business or sell one or more of the Company’s business(es) (or portions thereof). In the event that AIA Group or the Company purchase(s) a business, the personal data received with that business would be treated in accordance with this Privacy Policy Statement if it is practicable and permissible to do so. In the event that AIA Group or the Company sell(s) a business, provisions will be included in the selling contract requiring the purchaser to treat your personal data in the same manner required by the Privacy Policy Statement.

Your personal data may be provided to any of the above persons who may be located in other jurisdictions or territories to that in which you are located. Your information may be transferred to, stored, and processed in other jurisdictions where any AIA Entity is located, or jurisdictions where a third-party contractor is located or from which the third-party contractor provides us services. Where required under relevant law, we may seek your consent to the transfer of such information outside your jurisdiction to our facilities or to those third parties with whom we share it as described above. Your personal data will only be transferred to other locations, where we are satisfied that adequate levels of protection exist to protect the integrity and security of your personal data, which as a minimum are comparable to the jurisdiction or territory in which you provided such personal data.

Your Rights to Personal Data

In accordance with the Personal Data (Privacy) Ordinance (the “Ordinance”), you have the right to:

- (i) verify whether the Company holds any personal data about you and to access any such data;
- (ii) require the Company to correct any personal data relating to you which is inaccurate;
- (iii) withdraw your consent for use or provision of personal data for direct marketing;
- (iv) make a complaint about the Company's data handling; and
- (v) enquire about the Company's policies and practices in relation to personal data.

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

The Corporate Data Protection Officer
Blue Care Medical Services Limited
54/F, Hopewell Centre
183 Queen’s Road East
Wanchai, Hong Kong
Email: bluecare@bluecare.com.hk

Under the Ordinance, the Company has the right to charge a reasonable fee which are directly related to and necessary for the processing of any data access request.

You also have the right to lodge a complaint with a supervisory authority in certain jurisdictions if you consider that the processing of your personal data infringes applicable law.

Use and Provision of Personal Data in Direct Marketing

Subject to your consent, the Company may use your personal data (including Medical Data) in direct marketing and provide your personal data (including Medical Data) to the Company's Alliance Program Partners (as defined in paragraph (iii) below) for their use in direct marketing. In this connection, please note that:

- (i) the name and contact details, transaction pattern, behavior, Medical Data and health information of you held by the Company from time to time may be used by the Company in direct marketing;
- (ii) the following services, products, advice and subjects may be marketed:
 - (a) insurance, annuities, mandatory provident fund schemes or occupational retirement schemes, wealth management, credit cards, financial, banking and related services and products;
 - (b) reward, loyalty, lucky draw programs or privileges programs and related services and products;
 - (c) services and products offered by the co-branding partners and/or marketing partners of the Company and/or any AIA Entity (the names of such co-branding partners and/or marketing partners can be found in the registration form(s) and/or promotional material for the relevant services and products, as the case may be);
 - (d) medical and healthcare services and products; and
 - (e) charitable, non-profitable, educational, recruitment and training causes;
- (iii) the above services, products, advice and subjects may be provided by the Company and/or the persons/providers below:
 - (a) any AIA Entity;
 - (b) third party reward, loyalty, co-branding or privileges program providers;
 - (c) co-branding partners and/or marketing partners of the Company and/or any AIA Entity (the names of such co-branding partners and/or marketing partners can be found in the registration form(s) and/or promotional material for the relevant services and products, as the case may be); and/or
 - (d) medical and healthcare service providers, (collectively "Alliance Program Partners");
- (iv) in addition to the Company marketing the above services, products, advice and subjects itself, the Company also intends to provide the personal data (including Medical Data) described in paragraph (i) above to all or any of its Alliance Program Partners described in paragraph (iii) above for use by them in marketing those services, products, advice and subjects described in paragraph (ii) above by contacting you. The Company will obtain your written consent (which includes an indication of no objection) before we pass your personal data (including Medical Data) to Alliance Program Partners for any direct marketing purposes; and
- (v) the Company may receive money or other property in return for providing the personal data to its Alliance Program Partners in paragraph (iii) above.

If you do not wish the Company to use or provide to its Alliance Program Partners your personal data we collected in the ordinary course of our business for use in direct marketing as described above or to transfer such data to third parties to conduct direct marketing as described in this Statement, you may exercise your opt-out right by notifying the Company. To exercise your opt-out right, you may write to the Data Protection Officer of the Company at the address and email address provided in section "Your Rights to Personal Data" above,

or provide the Company with your opt-out choice in the relevant application form (if applicable).

Use of Artificial Intelligence

Artificial Intelligence (“AI”) is a technology to simulate the human thought process to perceive, understand, reason and solve problems to augment, improve, or replace human decisions.

While we carry out our business, we may use AI to process your personal data to fulfil the Purposes. Common examples for using AI include:-

- (i) Customer interaction – natural language processing that converts voice to text and conducts appropriate interaction with customers;
- (ii) Digital onboarding and servicing processes – application and servicing processes using optical character recognition tool that recognizes text within digital images and validates the accuracy of form contents filled out against the supporting documents;
- (iii) Product and portfolio recommendation – AI is used to conduct big data analysis based on our customer database and enables us to understand the needs of our customers; and
- (iv) any other use in relation to the Purposes.

Use of Cookies

Cookies are small text containing small amounts of information which are downloaded and may be stored on any of your web browsers or internet enabled devices (e.g. your computer, smartphone or tablet) that can later be read by the server - like a memory for a web page.

The Company may use cookies and other tools on the website. By continuing to use the website, you are agreeing to us placing cookies on your computer. The information collected (including but not limited to: your IP addresses (and domain names), browser software, types and configurations of your browser, language settings, geo-locations, operating systems, referring website, pages and content viewed, and durations of visit) will be used to ensure operation of the website and enable you to log in securely, for compiling aggregate statistics on how our visitors reach and browse our websites for web enhancement and optimisation purposes, and to help us understand how we can improve your experience on it.

The cookies also enable our website to remember you and your preferences, and tailor the website for your needs. Advertising cookies will allow us to provide advertisements on our websites that are as relevant to you as possible, e.g. by selecting interest-based advertisements for you, or preventing the same advisement from constantly reappearing to you.

External links

If any part of this website contains links to other websites, those sites may not operate under this Privacy Policy Statement. You are advised to check the privacy statements on those websites to understand their policies on the collection, usage, transferal and disclosure of personal data.

Amendments to this Privacy Policy Statement

The Company reserves the right, at any time and without notice, to add to, change, update or modify this Privacy Policy 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 on our website 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. Where required by applicable law, we may also notify you in the event of material changes to this Privacy Policy Statement and, where required, seek your consent to those changes.



Additional Information

Should you have any questions on any part of this Privacy Policy Statement or would like additional information regarding the Company's data privacy practices please do not hesitate to contact us by the contact details above.

Issued by Blue Care Medical Services Limited

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