



Personal Information Collection Statement (“PICS”)
(Version 052023)

1. **Purpose:** Sompo Insurance (Hong Kong) Co., Ltd. (the “Company”) is committed to protecting the personal data of our customers. The Company is also committed to the implementation of the data protection principles set out in Schedule 1 of Personal Data (Privacy) Ordinance (“the PDPO”)(Chapter 486 of the laws of Hong Kong). From time to time it is necessary for you to supply the Company personal data of you, insured and beneficiary under the insurance policy which may be used, stored, processed, transferred, disclosed or shared by the Company for the following purposes:
 - (a) processing and evaluating your application or request for and any alterations, variations, cancellation, renewals and reinstatements of any insurance products and / or services offered by the Company;
 - (b) administering your insurance policy and providing services in relation to your insurance policy;
 - (c) any purposes in connection with any claims made by or against or otherwise involving you in respect of any products and / or services provided by the Company, including processing and / or investigating any claims and detect / prevent fraud;
 - (d) invoicing and collecting premiums and / or outstanding amounts from you;
 - (e) exercising any right of subrogation, if applicable;
 - (f) conducting statistical analysis;
 - (g) contacting you for any of the above purposes;
 - (h) meeting the requirements to make disclosure (i) under any law binding on the Company; or (ii) under any applicable rules, regulations, codes or guidelines or to assist in law enforcement purposes, investigation by police or other government or regulatory authorities; or (iii) for complying with any requirements, policies or measures for using data and information within Sompo Holdings Group (“the Group”) in accordance with any Group-wide programmes from time to time for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities / misconducts;
 - (i) other purposes directly related to any of the above purposes.

For using the personal data provided by you for promotional / marketing purposes, please refer to the section titled “**Use of Personal Data in Direct Marketing**”.

The failure of providing the Personal Data by you may result in the Company being unable to provide products and services, assess your policy application, process claims under insurance policies issued by us, or process any other requests, enquiries, or complaints from you, or any of the purposes listed above.
2. **Transfer:** The Company may disclose your personal data to the following transferees in Hong Kong or overseas, including transferring into and out of the European Economic Area, for the above purposes:
 - (a) third party agents, contractors and advisors who provide administrative, communications, computer, payment, security or other services which assist the Company to carry out the above purposes (including medical service providers, hospitals, emergency assistance service providers, mailing houses, IT service providers and data processors);
 - (b) in the event of a claims, loss adjusters, claims investigators and medical advisors;
 - (c) in the event of default, debt collectors and recovery agents;
 - (d) insurance reference bureaus or credit reference bureaus;
 - (e) reinsurers and reinsurance brokers;
 - (f) financial services intermediaries that are authorized by the Company for the distribution of products and services provided by the Company including your insurance agents, intermediaries or brokers, if applicable;
 - (g) legal and professional advisors of the Company;
 - (h) The Group and any associated companies of the Company;
 - (i) the policyholder, when none of the insured person(s) of that policy is the policyholder, for the purpose of policy application, administration, renewal and / or claims administration (if applicable);
 - (j) relevant industry association and federation that exists or is formed from time to time;
 - (k) the fraud prevention database or registers (and the operators) and any participating parties of the database including other insurance companies and service providers handling claims for them;
 - (l) governments and authorities within or outside HKSAR as required or permitted by law. The Company may also use and disclose your personal data otherwise with your consent;
 - (m) any third party in connection with a transfer or potential transfer of all or part of the business of the Company that some of the transferees may be located within or outside of HKSAR.
3. **Access:** You have the right to ascertain what type of personal data the Company holds, whether the Company holds your personal data and, if so, the right to request access to and to request correction of any personal data concerning you held by the Company. Such request can be made to the Data Protection Officer, Sompo Insurance (Hong Kong) Co., Ltd, 21/F, Berkshire House, Taikoo Place, 25 Westlands Road, Quarry Bay, Hong Kong. The Company reserves the right to charge a reasonable fee for processing a request to access your personal data access request.

Use of Personal Data in Direct Marketing

Apart from the aforementioned purpose, the Company may also use your name, contact details, demographic information, policy details, products and services portfolio information, transaction pattern and behavior, and financial background held by the Company to contact you with direct marketing communications regarding financial and insurance products by mail, email, telephone, facsimile or SMS. The Company may also provide your name, contact details, demographic information, policy details, products and services portfolio information, transaction pattern and behavior, and financial background held by the Company to the following transferees: (I) third party financial institutions, insurers, banks, credit card companies, securities and investment services providers; (II) third party reward, loyalty, privileges programme providers or merchants; and (III) charitable or non-profit making organizations for gain who may send you direct marketing communications regarding (1) insurance, banking, credit card, financial, provident fund scheme and related products and services; (2) reward, loyalty or privileges programmes and related products and services; and (3) donations and contributions for charitable and / or non-profit making purposes by mail, email, telephone, facsimile or SMS.

Before using your personal data for contacting you with direct marketing communications, the Company must obtain your written consent, and only after having obtained written such consent, the Company may use your personal data for any direct marketing purpose.

You may in future withdraw your consent to the use of your personal data for direct marketing purposes by the Company or the transferees and thereafter the Company shall, without charge to you, cease to use such data for direct marketing purposes. If you wish to withdraw your consent, please inform the Company by writing to the Data Protection Officer, Sompo Insurance (Hong Kong) Co., Ltd, 21/F, Berkshire House, Taikoo Place, 25 Westlands Road, Quarry Bay, Hong Kong.



Amendment to the PICS

The Company reserves the right at anytime, with or without notice, amends this PICS which will be found in our website or in writing to notify you how the Company will collect, use and transfers your personal data. Should there be any amendment to this PICS in the future, such amendment will become effective with immediate effect.

個人資料收集聲明

(052023 版本)

- 目的：**日本財產保險（香港）有限公司（“本公司”）致力於保障本公司顧客的個人資料。本公司亦致力遵守《個人資料（私隱）條例》（“《條例》”）（香港法律第 486 章）附表 1 列明的保障資料原則。閣下可能因下列各項目的需要不時向本公司提供閣下、保單受保人及保單受益人的個人資料而供本公司使用、儲存、處理、轉移、披露或共享該等個人資料：

 - 處理和評估閣下就本公司所提供的產品及／或服務的申請或要求，或作任何更改、變更、取消、續期和復效；
 - 執行閣下保單的行政工作及提供與閣下保單相關的服務；
 - 與就本公司提供的任何產品及／或服務而由閣下或針對閣下提出的或者其他涉及閣下的任何索償任何目的，包括處理及／或索償調查及偵查／防止欺詐行為；
 - 發出繳交保費通知及向閣下收取保費及／或欠款；
 - 行使任何代位權，如適用；
 - 進行統計分析；
 - 就以上用途聯絡閣下；
 - 與根據 (i) 對本公司有約束力的任何法律的規定；或 (ii) 作出任何適用規則、規例、守則或指引所要求的披露或協助警方或其他政府或監管機構執法及進行調查；或 (iii) 為遵守根據集團方案於 Sompo Holdings Group（“集團”）內使用資料及資訊的任何要求、政策或措施，而該集團方案乃為符合制裁或預防或偵測清洗黑錢、恐怖分子融資或其他非法活動／不當行為的目的而不時被制定的；
 - 與上述任何目的直接有關的其他目的。

就本公司使用閣下提供的個人資料作宣傳或市場推廣用途，請參閱「[使用個人資料作直接促銷用途](#)」一節。
未能提供所需的個人資料可能導致本公司無法為閣下提供產品及服務、評估閣下的保單申請、處理保單索償、或處理任何閣下提出的要求、查詢或投訴、或任何上述用途。
- 轉移：**本公司亦可因應上述用途披露閣下的個人資料予下列位於香港或海外地方的受讓人，包括轉入及轉出歐洲經濟區：

 - 就上述用途，向本公司提供行政、通訊、電腦、付款、保安及其它服務的第三方代理、承包商及顧問（包括：醫療服務供應商、醫院、緊急救援服務供應商、郵寄服務商、資訊科技服務供應商及數據處理服務商）；
 - 處理索償個案的理賠師、理賠調查員及醫療顧問；
 - 追討欠款的收數公司或索償代理；
 - 保險資料服務公司及信貸資料服務公司；
 - 再保公司及再保經紀；
 - 獲本公司授權以分銷本公司所提供之產品及服務的金融服務中介團體包括閣下的保險顧問、代理及經紀（如適用）；
 - 本公司的法律及專業顧問；
 - 集團及本公司的聯繫公司；
 - 保單持有人（而該保單的所有受保人均非保單持有人），以執行該保單的投保、行政、續期及／或處理索賠（如適用）；
 - 現有或不時成立的相關行業協會及聯會；
 - 上載往偵查／防止欺詐的數據庫或登記冊（及其營運者）及參與的第三方公司包括其他保險公司及為其處理索償個案的第三方代理；
 - 法例要求或許可的政府機關。經閣下同意，本公司可能會以其它方式使用及披露閣下的個人資料；
 - 與本公司業務的轉讓或擬議轉讓有關的任何第三方，當中部分受讓方或位於香港境內或境外。
- 查閱：**閣下有權查明本公司持有個人資料的類別、本公司是否持有閣下的個人資料，如持有，閣下有權要求查閱本公司持有涉及閣下的個人資料以及要求對該等資料作出更正。閣下可向本公司的資料保障主任提出要求，地址為香港鰂魚涌華蘭路 25 號太古坊栢克大廈 21 樓。本公司有權為處理閣下的個人資料查閱要求而收取合理費用。

使用個人資料作直接促銷用途

除上述提及的使用用途，本公司可能將本公司持有閣下的姓名、聯絡資料、人口統計資料、保單資料、產品及服務組合資料、交易模式及行為、及財務背景通過書信、電郵、電話、傳真或短訊與閣下聯絡，提供金融及保險產品的直接促銷通訊。此外，本公司可能將本公司持有閣下的姓名、聯絡資料、人口統計資料、保單資料、產品及服務組合資料、交易模式及行為、及財務背景給下列受讓人：(I) 第三者金融機構、承保商、銀行、信用卡公司、證券及投資服務供應商；(II) 第三方獎賞、長期客戶或優惠計劃供應商或商號；(III) 及慈善或非牟利機構。受讓人可以通過書信、電郵、電話、傳真或短訊與閣下聯絡，提供 (1) 保險、銀行、信用卡、財務、公積金計劃及相關的產品及服務；(2) 獎賞、長期客戶或優惠計劃及相關的產品及服務；及 (3) 為慈善及／或非牟利用途的捐款及捐贈的直接促銷通訊。

就直接促銷用途向上述受讓人提供閣下的個人資料前，我們必先取得閣下的書面同意，並僅會在取得有關書面同意後方可使用閣下的個人資料作直接促銷用途。

閣下將來可以撤回閣下對個人資料作本公司及第三方直接促銷用途的同意書；此後，本公司會在不收取任何費用的情況下停止使用該等資料作直接促銷之用。如閣下欲撤回以上同意，閣下可向本公司的資料保障主任提出要求，地址為香港鰂魚涌華蘭路 25 號太古坊栢克大廈 21 樓。

個人資料收集聲明的修訂

本公司保留權利可隨時且在無須通知的情況下，修訂本聲明，本公司亦可在本公司的網站或以書面形式知會閣下，閣下因而能得悉本公司如何收集閣下的個人資料、如何使用該資料及轉移該資料的情況。任何有關修訂將在刊登後即時生效。