



Liberty's Data Protection Policy

We at **Liberty Insurance Pte Ltd** ("**Liberty**") take our responsibilities under Singapore's Personal Data Protection Act 2012 (the "**PDPA**") seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process the personal data of yours and other individuals.

This Data Protection Policy sets out how we collect, use, and disclose the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data or that of other individuals.

You agree to all terms of this Policy, both now and in advance as it may be amended from time to time.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "**DPO**") at:

Data Protection Officer
51 Club Street, #03-00
Liberty House
Singapore 069428

1 INTRODUCTION TO THE PDPA

- 1.1 "Personal Data" is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.
- 1.2 We will collect the personal data which you or your representatives have provided about yourself or other individuals in accordance with the PDPA ("**personal data**"). If there is any personal data relating to other individuals, you agree to obtain prior consent from them (or if they are lacking in legal capacity, from their legal representatives, guardians or parents as the case may be) for Liberty and third-parties including its related companies, employees, agents, service providers, organizations and contractors etc (collectively, "**appointees**") to collect, use and disclose their personal data for the relevant purposes and on the same terms.
- 1.3 We will notify you of the purposes for which personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to do so without your consent.
- 1.4 You warrant that all personal data provided by you are true, accurate and complete.

2 PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

- 2.1 You agree that the personal data about yourself or other individuals can be collected, used, and disclosed by us or our appointees for various purposes permitted by law including:

- (a) due diligence and considering whether to provide insurance. This includes Liberty considering your application for a policy with Liberty and another Insurer considering your application (whether now or in the future) for a policy with that Insurer; &
- (b) underwriting, pricing and insurance. This includes dealing with your application with Liberty and any other application that you may make (whether now or in the future) with another insurer; &
- (c) administering and/or managing your relationship, account and/or policy with Liberty including but not limited to renewing or reinstating policies, demanding, collecting any outstanding amounts due from you, processing refunds to you; &
- (d) processing and/or dealing with any claims including the settlement of claims and any necessary investigations relating to the claims, under your policies, whether the policies are issued by Liberty or another Insurer; &
- (e) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by Liberty, whether for this policy with Liberty or a policy with another Insurer; &
- (f) carrying out your instructions or responding to any enquiries; &
- (g) conducting research, surveys, analysis and development activities (including but not limited to data analytics, surveys (such as insurance survey, customer service survey, branding survey), branding campaign, product and service development and/or profiling); &
- (h) communications - this includes but is not limited to communicating with you via phone/voice calls, text messages and/or fax messages, email and/or postal mail. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages; &
- (i) investigating fraud, misconduct, any unlawful action or omission, whether relating to your application, your claims or any other matter relating to your policy or policies, whether such policy is issued by us or another Insurer, and whether or not there is any suspicion of the aforementioned; &
- (j) reinsurance; &
- (k) storing, hosting, backing up (whether for disaster recovery or otherwise) ;&
- (l) accounting, auditing, legal, regulatory and compliance; &
- (m) for management of IT environment and business operations; &
- (n) to ensure security of our IT environment; &
- (o) detect and investigate illegal activity, including fraud, money laundering or terrorism financing; &
- (p) comply with legal, regulatory and other good governance obligations, including responding to requests from public and governmental authorities (including those outside your country of residence); &
- (q) for monitoring and assessing compliance with Liberty Insurance Pte Ltd and Liberty Mutual Group of Companies' policies and standards; &
- (r) achieve other legitimate business purposes, for example, to carry out research and analysis, including analysis of our customer base and other individuals whose personal data we have to analyse behaviour, preferences and interests, develop new

- products, improve our services, identify usage trends, understand the interests of our users, to plan and execute business transactions (including joint ventures and business sales) and for other legitimate business purposes; &
- (s) automated decision making processes in some circumstances; &
 - (t) data processing outside Singapore – we may share personal data with one or more of our affiliated Liberty Mutual Group companies, service providers or with third parties for the purposes described in this Policy. By sharing personal data with Liberty, you consent to the collection, use, disclosure, processing and transfer of such information in accordance with this Policy to the United States or other countries. The Liberty Mutual Group will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this Policy; &
 - (u) if you have so consented - to send you marketing, advertising and promotional information about other insurance, investment and/or financial products and/or services that Liberty may be selling or marketing; &
 - (v) any purpose which is incidental, implied, ancillary, exploratory, enhancing or supportive of any of the above purposes; &
 - (w) any other purposes which you agree to at the time of obtaining your consent.
- (collectively, the “**Purposes**”)

3 You agree that we can disclose the personal data to appointees and third parties whether sited in Singapore or outside of Singapore, for one or more of the abovementioned Purposes or as permitted by law. Without limiting the generality of the foregoing, such appointees and third parties include:

- (a) Our Liberty Mutual Group of Companies: Other Liberty Mutual affiliates may have access to and use of personal data in connection with the conduct of our business where appropriate; &
- (b) Our service providers: External third-party service providers and Liberty Mutual affiliates in a service provider role, such as accountants, auditors, lawyers and other outside professional advisors; call center service providers; IT systems and management, IT support and security service providers; cloud providers, research and analytics service providers; claim investigators and adjusters; and similar third-party service providers that assist us in carrying out business activities; &
- (c) Other third parties: To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); to reinsurance companies; &
- (d) As we believe to be necessary or appropriate: To comply with legal process, to respond to requests from public and government authorities including public and government authorities outside your country of residence, to enforce our terms and conditions, to protect our operations, to protect our rights, privacy, safety or property, and/or that of you or others; to detect and prevent fraud; and to allow us to pursue available remedies or limit the damages that we may sustain; &
- (e) any of Liberty’s agents, employees, contractors or service providers – for example, mailing houses, telecommunication companies, insurance intermediaries, information technology companies, events managers, debt collection services, data storage or

- hosting companies, data centres, disaster recovery service providers, banks, finance companies, actuaries, consultants, auditors, etc; &
- (f) lawyers/law firms, legal process participants and their advisors; &
- (g) industry or public/government organizations

3.1 You also agree to the General Insurance Association of Singapore's (GIA) Data Protection Policy (available from the GIA,) in relation to their collection, use, processing and/or disclosure of all personal data, both now and as it may be amended by the GIA from time to time.

4 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession by submitting your request to Data Protection Officer at

Data Protection Officer
51 Club Street, #03-00
Liberty House
Singapore 069428

4.2 For a request to access personal data, we will provide you with the relevant personal data within a reasonable time from such a request being made.

4.3 For a request to correct personal data, we will:

- (a) correct your personal data as soon as practicable after the request has been made unless we have reasonable grounds not to do so; and
- (b) subject to paragraph 4.4, we will send the corrected personal data to every other organization to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organization does not need the corrected personal data for any legal or business purpose.

4.4 Notwithstanding paragraph 4.3(b), we may, if you so consent, send the corrected personal data only to specific organizations to which the personal data was disclosed by us within a year before the date of correction was made.

4.5 We will also be charging you a reasonable fee for the handling and processing of your requests to access and/or correct the personal data.

5 REQUEST TO WITHDRAW CONSENT

All consents are given now, unconditionally and independent of any contract, last beyond any contractual term and remain in force until you request to withdraw or amend the consents with Liberty by writing to The Data Protection Officer, or by email to dpo@libertyinsurance.com.sg:

Data Protection Officer
Liberty Insurance Pte Ltd
51 Club Street, #03-00
Liberty House
Singapore 069428

5.1 We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose the personal data for the purposes as stated in your request.

- 5.2 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the nature and extent of your withdrawal of consent in relation to the personal data, it may mean that we will not be able to continue with your or the data subject's existing relationship with us.

6 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 6.1 We will take reasonable efforts to ensure that personal data is accurate and complete, if personal data is likely to be used by us to make a decision that affects you, or disclosed to another organization. However, this means that you must also update us of any changes to the personal data that you had initially provided us with. We will not be liable for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in the personal data that you had initially provided us with.
- 6.2 We will also put in place reasonable security arrangements to ensure that personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of personal data by third parties which are wholly attributable to factors beyond our control.
- 6.3 We will also put in place measures such that personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

7 COMPLAINT PROCESS

- 7.1 If you have any complaint or grievance regarding about how we are handling personal data or about how we are complying with the PDPA, please contact us with your complaint or grievance.
- 7.2 Please write in to us with your complaint or grievance at:
(a) Office address: 51 Club Street, #03-00 Liberty House, Singapore 069428. Attention it to the **Data Protection Officer**.
- 7.3 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

8 UPDATES ON DATA PROTECTION POLICY

- 8.1 As part of our efforts to ensure that we properly manage, protect and process personal data, we will be reviewing our policies, procedures and processes from time to time.
- 8.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. You agree in advance to all and any amendments that we may make. Any amended Data Protection Policy will be posted on our website and can be viewed at www.libertyinsurance.com.sg/data-protection-policy/.