



## **Apeiron International Limited**

### **Customer Data Protection and Privacy Policy**

Apeiron International Limited and its affiliates and subsidiaries (collectively, “Apeiron”) knows that you care about how your personal information is used and shared, and we take your privacy very seriously. Please read this Customer Data Protection and Privacy Policy (this “Policy”) carefully. This Policy will apply to you if you engage Apeiron in connection with services provided by Apeiron, if you indirectly benefit from such services, or if you visit our website. By transferring personal data or visiting our website you explicitly agree to the terms and conditions of this Policy. This Policy does not apply to the practices of third parties that Apeiron does not own or control, or to individuals that Apeiron does not employ or manage.

It also explains certain legal rights you have in connection with your personal information which is handled by Apeiron. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by Apeiron, if any.

Apeiron may be required to revise this Policy from time to time to reflect changes in law or changes in its business operation. You can find the latest version of this Policy on the Apeiron website [www.apeirongroup.com](http://www.apeirongroup.com). You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. We encourage you to periodically review our Policy for the latest information on our privacy practices. If your consent to a change would be required following the applicable laws, Apeiron will notify you of the change and await your consent.

This Policy was last updated March 2020.

1. Who at Apeiron is responsible for my personal information?

Apeiron is one of the most trusted international life insurance distributors and brokers, offering bespoke advisory, brokerage, and distribution services. The particular Apeiron company who is responsible for the handling of your personal information in connection with the services provided by Apeiron will vary depending on geographical location, and can include:

- Apeiron International Limited, Correspondence Office: Room 1208, 12F, 181 Des Voeux Road Central, Hong Kong SAR,
- Apeiron International (HK) Limited, Principal Office: Room 1208, 12F, 181 Des Voeux Road Central, Hong Kong SAR
- Access Group International Inc. dba Apeiron International, Registered Office: 10900NE 4th Street, Suite 2300, Bellevue WA 98004, USA
- Apeiron Tech Pte Ltd, Singapore, Administration Office: Room 1208, 12F, 181 Des Voeux Road Central, Hong Kong SAR
- Apeiron Private Client Services, a division of NS (S) Pte Ltd., 56 Lorong 23 Geylang #04-01 Century Technology Building, Singapore 388381

Furthermore, some of the personal data can also be processed at the holding entities in the Apeiron group.

2. How does Apeiron obtain my personal information?

Except where you approach Apeiron directly, your basic personal information (e.g. your name, contact details, etc.) was provided to Apeiron by third parties who have obtained your consent for the provision of your basic personal information to Apeiron and have referred you to Apeiron (e.g. your bank or your financial advisor).

Apeiron will then collect additional personal information directly from you, and also from a variety of sources who have obtained your consent, such as the doctor who conducts your medical examination, credit reference agencies, publicly accessible registers and databases, your bank, your employer, etc.

Apeiron might also collect personal information through the Apeiron website [www.apeirongroup.com](http://www.apeirongroup.com). Apeiron, and its third party service providers and authorized agents, automatically receive and store certain types of “traffic data” on our server logs from your browser including your IP address, Apeiron cookie information, and the page your request. Apeiron uses this traffic data to help diagnose problems with its servers, analyze trends, and administer the website.

Apeiron may also collect, use and disclose personal data without consent if permitted or required by the applicable laws (such as when the processing of your personal data is necessary for the performance of a contract).



It is not mandatory for you to provide all of the personal information Apeiron asks you to provide, but if you refuse to provide your personal information, your refusal may restrict the availability of insurance that can be placed through the services provided by Apeiron, or otherwise adversely affect the ability of Apeiron to provide its services in a timely and satisfactory manner.

### 3. What personal information about me does Apeiron collect?

Apeiron collects such personal information relating to you which are necessary in order to provide the services which you request, services which you did not personally request but are to be arranged for your benefit upon your instruction or for the other purposes mentioned below. The exact nature and amount of information collected will vary depending on your personal circumstances, but will typically include the following categories of personal information:

- Your name, address, contact details, gender, date/place of birth, marital status, nationality, country of residence, family composition, dependents, occupation, hobbies, habits, and other like demographic information.
- Your identifiers such as bank account numbers, social security number, passport number, etc.
- Information about your finances, such as details of your income, assets, investments, debts, credit-worthiness, existing insurance arrangements, etc.
- Information about your physical and mental health, including your medical history.
- Other information which Apeiron is obliged to obtain or check for legal or regulatory reasons, or Apeiron needs to obtain in order to enable the insurers to provide you with quotation (which may include personal information of sensitive nature such as any criminal records).
- Cookies are alphanumeric identifiers that Apeiron transfers to your computer's hard drive through your web browser to enable our systems to recognize your browser and tell us how and when pages in our website are visited and by how many people. Apeiron cookies do not collect personal information, and we do not combine information collected through cookies with other personal information to tell us who you are or what your screen name or e-mail address is. The "help" portion of the toolbar on the majority of browsers will direct you on how to prevent your browser from accepting new cookies, how to command the browser to tell you when you receive a new cookie, or how to fully disable cookies. We recommend that you leave the cookies activated because cookies allow you to use some of Apeiron's coolest features. Some of our business partners, like our advertisers, may use cookies on our website. Apeiron has no access to, or control over, these cookies.

Apeiron will follow appropriate processes and make reasonable effort to accurately record in its system the personal data provided by you or by any other party validly acting on your behalf. Apeiron generally relies on personal data provided by you (or your authorized representative). In order to ensure that your personal data is current, complete and accurate,



please inform the relevant Apeiron company if there are changes to your personal data (such as when you have a new email address or telephone number) by contacting us via the contact details provided below and this in a timely, legible and complete manner.

#### 4. Why does Apeiron collect my personal information?

Apeiron collects, processes, modifies, retains and discloses your personal information primarily to provide the services which you request, or services which you did not personally request but is to be arranged for your benefit upon your instruction.

Other related purposes for which Apeiron collects, processes, and retains your personal information are as follows:

- Complying with legal and regulatory requirements imposed on Apeiron in connection with services provided by Apeiron (such as the Anti-Money Laundering rules and other due diligence requirements, in the context of claims).
- Improving or developing the services Apeiron provides, including the use of our website.
- Enabling us to assess your requirements, enabling insurers to provide quotations and to administer insurance policies in accordance with your requirements (including periodic assessment of your profile and portfolio, specific advice and the handling of any claim that might be made under an insurance policy).
- Enabling other third parties who are involved in services provided by Apeiron or provide other services that augment the services provided by Apeiron (e.g. other intermediaries, medical practitioners, premium finance providers, IT support providers, etc.) to perform their relevant tasks.

Additionally, Apeiron may also use your personal information to create aggregated and anonymized statistics to analyze, for example, the market trend for insurance-related products and services. The outcome of such analysis will be used to improve the products and services Apeiron offers, and may also be shared with third parties. However, under no circumstance will any specific personal information relating to you or any information from which you could be identified be included in such analysis.

The purposes listed in the above clauses may continue to apply even in situations where your relationship with Apeiron has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

Apeiron will never use your personal information for any purpose other than as described above without your prior written approval (except where permitted or authorized by law).



5. Does Apeiron share my personal information with third parties?

Apeiron may share your personal information with the following third parties:

- Other members of the Apeiron companies that are directly or indirectly involved in the delivery of services provided by the relevant Apeiron entity, including those that support the IT systems and operational processes that underpin the services provided by Apeiron. Please note that in order to provide you with a seamless service, different offices of Apeiron may access your personal information regardless of the country in which you have engaged Apeiron.
- Those who are not affiliated with Apeiron, but nevertheless interact with Apeiron to facilitate the services provided by Apeiron or provide other services that augment the services provided by Apeiron, such as insurers, IT-providers, other intermediaries, medical practitioners, third parties (e.g. banks) that have referred you to Apeiron, premium finance provider (which could be different from your own bank), those who provide support services to Apeiron, and your professional advisors.
- Those with whom Apeiron is, for legal and regulatory reasons, obliged to share your personal information, including government agencies, regulatory and law enforcement bodies, tax and monetary authorities, and operators of fraud database. Please note that where Apeiron is legally obliged to share your personal information with such third parties, Apeiron may be forbidden from advising you of that fact that your personal information was disclosed to or requested by such third parties. In particular, please note that if you are a US citizen or US resident, Apeiron and/or your insurer may be required to share your personal information with the US authorities under the US Foreign Account Tax Compliance Act.

In all other cases, Apeiron will not share your personal information with other third parties without your prior written approval and where any other third party requests access to your personal information, Apeiron will not comply with such request without your prior written approval, unless Apeiron is legally compelled to do so (e.g. by a court order) or allowed to do so by law.

If Apeiron is involved in a merger, acquisition or sale of all or a portion of its assets, your personal data may be transferred to the acquiring person or entity and you will be notified via email and/or a prominent notice on our website of any change in ownership or use of your personal data, as well as any choices you may have regarding your personal data.

Some of such third parties may be located outside the country of incorporation of the relevant Apeiron company (see below).

Whenever Apeiron transfers your personal information to third parties, appropriate steps and safeguards will be taken.

6. Does Apeiron transfer my personal information overseas?



Due to the international nature of the services Apeiron provides and the way in which Apeiron operates, Apeiron needs to transfer your personal information across international borders to a destination where the law governing the protection of your personal information may not be equivalent to the law that applies in your country of residence or the country in which the collection of your personal information takes place. Specifically, your personal information may be transferred or accessed across international borders by Apeiron as follows:

- Apeiron will provide services to you from its offices in Hong Kong, Singapore, and Bellevue, WA USA, as appropriate, using IT systems that are hosted and maintained by professional third-party service providers hosted offsite.
- It may be necessary for Apeiron to share your personal information with recipients other than other Apeiron companies who are based overseas. This will typically be the case where Apeiron approaches an insurer that operates internationally to arrange insurance for you. The location of such insurer will vary depending on the particular markets and insurers used. Please note that if you wish to obtain a policy issued by a US-based insurer, your personal information will need to be transferred to the USA regardless of the country in which you have engaged Apeiron.

Whenever Apeiron transfers your personal information across international borders, appropriate steps and safeguards that are within Apeiron's control will be taken to ensure that such transfer complies with the applicable legal requirements.

#### 7. Is my personal information secure?

Apeiron treats information security seriously. The secrecy and confidentiality of your personal information under Apeiron's control will be protected in accordance with strict standards set by information security framework which applies to all members of the Apeiron companies and is enforced by a dedicated team of experienced experts. Encryption, anti-malware, firewalls, restriction of access to files/premises/IT systems, back-up/disaster recovery system, careful selection of personnel as well as relevant third party service providers, internal policies, processes and procedures to restrict access to systems and personal data on a need-to-know basis and other technical and organizational measures as appropriate will be used to prevent and detect unauthorized or accidental access, loss, collection, copying, modification, disclosure, or other like incident that might affect your personal information, regardless of whether your personal data is held physically or electronically.

Your Apeiron account information is protected by a password for your privacy and security. Protect against unauthorized access to your password and to your computer by logging off once you have finished using a shared computer. Only employees who need personal information to perform a specific job (for example, a customer service representative) are granted access to it. All of our employees are kept up to date on our privacy and security practices.



You should be aware, however, that no method of transmission over the internet or method of electronic storage is completely secure. While security cannot be guaranteed, Apeiron strives to protect the security of your information and are constantly reviewing and enhancing our information security measures.

#### 8. Retention of my personal information

Apeiron shall cease to retain the documents containing personal data or remove the means by which the personal data can be associated with particular individuals as soon as it is reasonable to assume that (a) the purpose for which the personal data was collected is no longer being served by retention of the personal data; and (b) retention is no longer necessary for legal or business purposes depending on the applicable laws.

#### 9. Your rights

##### A. Right of access, right to rectification and right to erasure

You have the right to access your personal information held by Apeiron, and to ask Apeiron to correct where it is inaccurate or out-of-date or delete your personal information in cases where no other legal restrictions exist.

Note that Apeiron might not be required to give you access to or correct or delete your personal data following the applicable laws. If Apeiron is unable to provide you with any personal data or to make a correction or deletion requested by you, Apeiron shall generally inform you of the reasons why it is unable to do so (except where it is not required to do so under the applicable laws).

Please note that depending on the request that is being made, Apeiron will only need to provide you with access to the personal data contained in the documents requested, and not to the entire documents themselves.

##### B. Withdrawal of consent

You may at any time withdraw any consent given or deemed to have been given in respect of the collection, use or disclosure by Apeiron. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Apeiron will notify you of the consequences of it acceding to the same, including any legal consequences which may affect your rights and liabilities to Apeiron.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

##### C. Right to restriction of processing



You have the right to obtain from Apeiron restriction of processing following the applicable laws e.g. whilst complaints are solved.

#### D. Right to object

You have the right to object at any time to the processing of your personal data in line with the applicable laws. Apeiron shall in that case no longer process your personal data unless it has legitimate grounds to do so following the applicable laws.

#### E. Data portability

You have the right to have your personal data transmitted to you or another data controller in a commonly used machine-readable format.

#### F. General

Apeiron will respond to requests or questions as soon as reasonably possible.

The information shall be provided free of charge, unless the requests are manifestly unfounded or excessive.

For the protection of your personal data, Apeiron will need to verify your identity before processing your request. Apeiron will verify your identity by, for example, asking to look at relevant identification documents. If Apeiron is unable to verify your identity, you will not be provided access to your personal data.

Our website might include links to other websites whose privacy practices may differ from those of Apeiron. If you submit information to any of those sites, your information is governed by their privacy policies.

As stated previously, you can always opt not to disclose information, but then you may be unable to use certain features on our website, such as posting new links. By visiting your User Profile, you can correct, amend, add or delete personal information on our website. When you update information, however, we often maintain a copy of the unrevised information in our records.

You may request deletion of your Apeiron account by e-mailing us at [support@apeirongroup.com](mailto:support@apeirongroup.com).

If you do not wish to receive e-mail from us or other Apeiron users, please email to [unsubscribe@apeirongroup.com](mailto:unsubscribe@apeirongroup.com) to remove yourself from future e-mail message. However, please note that you will continue to receive all system e-mails (e.g. those regarding forgotten user passwords) and legal notices (e.g. updates to our policies) from us.

As explained earlier, the “help” portion of the toolbar on the majority of browsers will direct you on how to prevent your browser from accepting new cookies, how to command the browser to tell you when you receive a new cookie, or how to fully disable cookies.





Please note, however, that if your browser does not accept cookies, you will not be able to take advantage of some of our attractive features.

You always have the right to lodge a complaint with the relevant supervisory authority.

10. Who at Apeiron can I contact about my personal information?

Apeiron is very concerned about your privacy and we will never provide your email address to a third party without your explicit permission. Apeiron may send out e-mail with Apeiron-related news, products, offers, surveys or promotions. You may also receive notification e-mails from Apeiron, which inform you of actions (e.g. friend requests) that have been performed on the site. If you do not want to receive email from us, please email to [unsubscribe@apeirongroup.com](mailto:unsubscribe@apeirongroup.com) to request us to delist your email message. However, please note that in all cases you will continue to receive all system emails (e.g. those regarding forgotten user passwords) and legal notices (e.g. updates to our policies) from us.

If you would like to exercise your rights, or if you have any question or concern regarding the way in which your personal information is handled by Apeiron, please contact us.

You may contact Apeiron with any question, concern, or complaint you may have about the way in which your personal information is handled by Apeiron. If you wish to do so, please contact:

Data Privacy Officer  
Apeiron International Limited  
Room 1208, 12F  
181 Des Voeux Road Central  
Hong Kong SAR  
+852 3653 5501  
[info@apeirongroup.com](mailto:info@apeirongroup.com)

