

## **PRIVACY STATEMENT**

### **General Insurance Reserving and Reporting Suite (hereafter referred to as “this Site”)**

**This Statement was last updated on 01/03/2022**

#### **1. Introduction**

PricewaterhouseCoopers ("PwC", "we", "us", or "our") is strongly committed to protecting personal information. This Statement describes why and how PwC collects and processes personal data through General Insurance Reserving and Reporting Suite and provides information about individuals' rights in relation to personal data.

This Statement applies to personal data provided to us by you. When collecting and using personal data our policy is to only collect what we need and to be transparent about why and how we process personal data. We may use the personal data provided in connection with General Insurance Reserving and Reporting Suite for any of the purposes described in this Statement or as otherwise stated at the point of collection.

You are visiting this Site as you are one of the following:

- Subscriber /Registered account user
- PwC employees in connection with your role at a PwC member firm
- PwC client's employees or authorized users

This Statement relates only to General Insurance Reserving and Reporting Suite. It does not relate to other products, services or sites of PwC or any other party.

#### **2. Data controller information**

The data controller is the entity with primary responsibility for the protection of personal information. The data controller of the personal information collected in connection with General Insurance Reserving and Reporting Suite is:

PricewaterhouseCoopers Limited

26/F Edinburgh Tower, 15 Queen's Road, Central, Hong Kong

Contact Persona: Randeep Chandrasekharan,  
randeep.chandrasekharan@hk.pwc.com

#### **3. Definitions**

In this Statement, we use the following terms:

“**this Site**” refers to General Insurance Reserving and Reporting Suite.

“**Personal data**” or “**personal identifiable information**” or “**personal information**” refers to any information or data (in a form in which access to or processing is practicable) relating directly or indirectly to a living or natural individual from which independently or in combination with other information it is practicable for the identity of the individual to be directly or indirectly ascertained or for the activity of the natural person to be directly or indirectly ascertained.

“**Processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, transferring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**PwC, we, us and our**” refer to the PwC network and/or one or more of its member firms. Each member firm in the PwC network is a separate legal entity. For a list of PwC firms see <https://www.pwc.com/gx/en/about/corporate-governance/legal-entities.html>. For countries and regions in which PwC firms operate see <http://www.pwc.com/gx/en/about/office-locations.html>.

#### 4. Collection of personal data and purposes of collection

In order for you to use this Site, you will need to provide us or allow us to collect certain necessary personal information as set out below, for the purpose of the following business functions:

<b>Business Function</b>	<b>Necessary personal information to be collected</b>
<ul style="list-style-type: none"><li>• Upload data to the Site</li><li>• Perform valuation in the Site, including the selection of assumptions</li><li>• Download results from the Site</li></ul>	<ul style="list-style-type: none"><li>• Full name</li><li>• Business email address</li></ul>

We will also use the personal information collected above for the following purposes:

<b>Data use purposes:</b>
1. To maintain the security of the services

- Authenticating the identity of users, authorising access to this Site (including preventing unauthorised access) and for other security-related purposes, including system monitoring.
2. To operate, administer, manage and improve this Site
    - Administering this Site, troubleshooting issues and identifying areas of improvement.
  3. To maintain our administrative or client relationship management systems
    - Where you are a business contact of ours, we will include your business contact details in our administrative or client relationship management systems, contact you in relation to the services and we may send you other material relevant to your interests (provided we have appropriate permission from you to do this, as required by laws).
  4. To analyse how this Site and associated services perform
    - We may analyse how this Site and associated services perform by reviewing the user data we capture.

You may choose not to provide all the information requested above, in which case you will not be able to use the Site.

You may also choose to provide additional information to us, for instance, as part of the registration process, register a user account, and/or create and update your user profile.

We do not intend to collect sensitive and/or special categories of personal information through this Site. Please do not provide any sensitive and/or special category personal data. Sensitive personal data and/or special category of personal data covers information relating to, among other things, race, ethnicity, political opinions, religious or philosophical beliefs, biometric or genetic data when used to uniquely identify you, information about health or sexual life or sexual orientation.

If you are providing personal data of other individuals, please make sure that

- (i) the personal data is from a legitimate and lawful source;
- (ii) the other individuals are aware of the purpose(s) for collecting his/her personal data and all other relevant arrangement described in this Statement relating to the processing and use of personal data, and that he/she has consented to such disclosure and data processing.

We may contact you to inquire and confirm with you in relation to (i) and (ii) above. If you receive such an enquiry from us, please kindly assist and provide us with prompt response. We may have to discontinue your use of this Site if we are unable to obtain the verification needed.

**By using this Site and providing personal information to us, you confirm that you have read this Privacy Statement, and explicitly consent to the processing of personal information by PwC and any third party recipients as set out in the Privacy Statement, including international transfers to countries/regions outside where you are located. PwC may rely on other legal grounds of processing to the extent permitted under applicable law.**

**If you do not agree with the terms in this Statement or have concerns about the categories of personal data, we require from you, please do not provide any personal information to us without contacting us.**

## **5. Third party links /Code /Plug-in**

This Site may link to third party sites not controlled by PwC and which do not operate under PwC's privacy practices.

When you access to third party sites, PwC privacy practices no longer apply, and the third party site is responsible for the personal information collected from you.

We encourage you to review each third party site's privacy policy before disclosing any personal information.

## **6. (Applicable only to personal information collected from European Economic Area) Our legal grounds for processing personal data**

Applicable laws may require us to set out in this Statement the legal grounds on which we rely in order to process your personal information. In such cases, we rely on one or more of the following processing conditions:

- our legitimate interests in the effective delivery of information and services to you and in the effective and lawful operation of our businesses and the legitimate interests of our clients in receiving professional services from us as part of running their organization (provided these do not interfere with your rights);
- our legitimate interests in developing and improving our businesses, services and offerings and in developing new PwC technologies and offerings (provided these do not interfere with your rights);
- to satisfy any requirement of law, regulation or professional body of which we are a member (for example, for some of our services, we have a legal obligation to provide the service in a certain way); or
- to perform our obligations under a contractual arrangement with you.

## **7. Transfers of personal data**

PwC is a global network with member firms and third party service providers located around the world. Your personal information may be transmitted and stored outside the country or region where you are located. PwC member firms, our service providers and sub-processors they engage may use servers and other resources in various countries and territories to process your information. This includes countries outside the European Economic Area (EEA) and countries that do not have laws that provide specific protection for personal information.

### **For personal information collected from Mainland China:**

Since we provide products or services through resources and servers all over the world, this means that after obtaining your authorized consent, your personal information may be transferred outside of the country/region where you use the Site.

Such jurisdictions may have different data protection laws. In such cases, in addition to complying with local applicable laws, we will enter into contract or other legally effective documents with the recipients of personal data, to ensure that your personal information is adequately protected. For example, we will ask for your consent to transfer personal information across borders, or implement appropriate security measures before cross-border data transfer.

Your personal data as set out in section 4 above may be transferred to, processed by and stored with the following classes of transferees/categories of recipients for the purposes as described in this Statement:

#### **(a) Recipients of personal data: other PwC member firms**

We may share personal data with other PwC member firms where necessary in connection with the purposes described in this Statement. For example, when providing services to a client we may share personal information with PwC member firms in different territories that are involved in providing services to that client.

#### **(b) Recipients of personal data: third party providers**

We may transfer or disclose the personal data we collect to third party contractors, subcontractors, and/or their subsidiaries and affiliates. Third parties support the PwC network in providing its services and help provide, run and manage IT systems. Examples of third party contractors we use include providers of identity management, website hosting and management, data analysis, data backup, security and cloud storage services. The servers powering and facilitating our IT infrastructure may be located in secure data centres around the world, and personal data may be stored in any one of them.

It is our policy to use only third party providers that are bound to maintain appropriate levels of security and confidentiality and process personal information only as instructed by PwC pursuant to the contract between PwC and such third party providers. Subject to the foregoing, third party providers may also use their respective subsidiaries and affiliates, and their own third party subcontractors that have access to personal data (sub-processors) to meet purposes of disclosure and/or transfer.

**(c) Other recipients of personal data**

We may also disclose personal information under the following circumstances to the extent permitted under applicable laws:

- with professional advisers, for example, auditors and law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our businesses. Personal data may be shared with these advisers as necessary in connection with the services they have been engaged to provide;
- when explicitly requested by you;
- when required to deliver publications or reference materials requested by you;
- when PwC is involved in a merger, acquisition, or sale of all or a portion of its assets (provided the recipient agrees to be bound by the terms of this Statement);
- with law enforcement or other government and regulatory agencies or with other third parties as required by, and in accordance with, applicable law and regulation; and/or
- occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable laws and regulations, to investigate an alleged crime or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable laws and regulations. This includes disclosures outside the country or region where you are located.

**For personal information collected from European Economic Area only:**

Where we collect your personal information within the European Economic Area, transfer outside the European Economic Area will be only:

- to a recipient located in a country or region which provides an adequate level of protection for your personal information; and/or

- under an agreement which satisfies EU requirements for the transfer of personal data to data processors or data controllers outside the EEA, such as standard contractual clauses approved by the European Commission.

## **8. Security of personal data**

We adhere to internationally recognised standards of technology and operational security in order to protect personal information from loss, misuse, alteration and destruction. Only authorised persons are provided access to personal information collected via this Site. These individuals have agreed to maintain the confidentiality of this information. We have a framework of policies and procedures in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by email) is never completely secure. We endeavor to protect personal data, but we cannot guarantee the security of data transmitted electronically over the Internet.

Where a personal information security incident arises, we shall respond to the incident, assess the likely impact of the incident, and take necessary actions to bring the incident under control. Where necessary, we will report to the appropriate authority and notify you of the incident as may be required under applicable laws and regulations.

## **9. Cookies**

Cookies may be placed on your computer or device whenever you visit the Site. Cookies are small text placed on our device that assist us in providing a more customised experience and to analyse your use of this Site.

If you are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, you can refuse a cookie, however some functionality may be impaired.

You can always delete cookies if you wish via your browser's setting.

## **10. Retention of personal data**

It is our policy not to retain personal data longer than is necessary for the fulfilment of the purposes for which the data are to be used. We will retain personal information on our systems for as long as we need it, given the purposes for which it was collected, or as required to do so by laws. Personal data may be held for longer periods where extended retention are agreed or

are required by laws or regulations or professional standards and in order to establish, exercise or defend our legal rights.

## **11. Children**

We are committed to protecting children's privacy. This Site is not intentionally designed for or directed at children, and we do not knowingly collect or store personal information about children. In the case of collecting personal information of a child in Mainland China under the age of 14 (i.e. a minor), we will only use or publicly disclose such information if we have obtained explicit consent of the minor's parent or guardian. We will protect the confidentiality and security of Children's personal information in accordance with relevant applicable laws and regulations.

## **12. Your rights in relation to your personal data**

You may have certain rights under applicable laws and regulations in relation to the personal data we hold about you, including:

- Right to enquiry and request for copy of certain categories of personal data, including basic information, identification information, health information (if applicable) and education information;
- Right to update/correct your personal data which is inaccurate;
- Right to request deletion of your personal data;
- Right to request cancelation of your account; and
- Right to withdraw consent to processing your personal information (to the extent such processing is based on consent and consent is the only permissible basis for processing). Should your consent withdrawal be effective, we will no longer process the corresponding personal information. However, your decision to withdraw your consent will not affect the processing of personal information previously based on your authorization.

***If you are an individual based in the EEA and GDPR is applicable to PwC in providing the PwC Services in question, you may be entitled to additional rights.***

## **13. Deactivate your account**

Users of this Site may request their account be deactivated at any time by sending their request to Mitchell Larsen, [mitchell.wr.larsen@hk.pwc.com](mailto:mitchell.wr.larsen@hk.pwc.com). We will respond to your request within the time required under applicable laws.



## **14. Contact us**

If you wish to submit a request to exercise your rights, under applicable privacy law, or have questions about how your information is handled at any time, or to make complaints, please send your request to our Privacy Team <https://www.pwccn.com/en/privacy-team-contact-form.html> or <https://www.pwchk.com/en/privacy-team-contact-form.html>.

When requested, and provided that it is practical and commercially feasible to comply with the request, we will respond to your request after we have verified your identity:

- within 15 working days for personal information collected from Mainland China; or
- such time frame as prescribed under applicable laws for other personal information.

For personal information collected within Mainland China, should you have any concerns with any matter in respect of this Statement, you may also approach members of the PwC team who is providing you or your organization with access to this Site to discuss.

Any unresolved dispute arising from or in connection with this Statement shall be resolved in accordance with the agreement (if applicable) between you/your organization and the PwC firm responsible for providing you with access to this Site.

## **15. Changes to this Statement**

We may need to update this Statement from time to time to comply with applicable laws and regulations or other legitimate purposes. We may also separately advise you about the change. Subject to obtaining your explicit consent as may be required by applicable laws, the new modified privacy statement will apply from that revision date. Therefore, we encourage you to review this Statement periodically to be informed about how we are protecting your information.