



APRIL International

APRIL International, cares about the protection of your personal data. We use a combination of technical, organisational and physical security measures to protect your personal data in line with our obligations under data protection laws. Our employees receive training to help us comply with data protection law and safeguard your privacy. This document explains how your data is used and what your rights are.

This Privacy Notice is issued on behalf of the April International group of companies. When we mention "April", "April International", "we", "us" or "our", what we mean is the relevant company in our group that processes your personal data.

1 Origin of the data

During application, issuance, administration and termination of your contract, we collect personal data from You, either directly or indirectly, in particular through your insurance intermediaries, medical practitioners and from the person who took out the policy on your behalf, for example your spouse or employer.

2 Data we collect

The personal data we may collect and process includes:

Type of data	Examples
General data	Name, date of birth, marital status, country of residence/citizenship and your relationships to other people, e.g. family members where they are also covered on the policy.
Contact data	Address, telephone number and e-mail address.
Identification data	Government issued identification numbers e.g. your passport number.
Health and lifestyle data	Whether you have ever smoked, details regarding alcohol consumption.
Product data	Includes information about quotes, policies and any other information relevant to your product.
Claims data	If a claim is made under your policy, information about the claim collected from you, your medical practitioner and relevant third parties.
Fraud and sanctions data	Information from checks of fraud databases and sanctions lists such as relationships/close associations with politically exposed persons.
Employment data	Employment status, job title and employment history.
Financial data	Credit and payment card numbers, bank account details and payment information.
Communications data	Information obtained from your correspondence with us, including e-mails, recordings of telephone calls or online chats with our representatives.
Sensitive personal data	Details of existing and previous physical or mental health conditions, health status, test results, medical diagnoses and treatment.



3 Processing your data

3.1. How is your data processed?

In the following table, we explain to you the purposes for which your data is collected and used, the basis on which it is processed, who is responsible for it and to whom it is disclosed.

Why do we collect it?	On what basis?	Who is responsible for this?	Who do we communicate it to?
Answer your insurance request (for this we can contact you by e-mail, phone or sms)			
Study of your insurance needs	Legal obligation to advise when we are your direct intermediary	Us	Service providers
Study of the conditions for accepting your application	Execution of pre-contractual measures	Us and the Insurer(s)	Insurers, reinsurers and partner intermediaries solicited Our bank Legally authorized authorities Service providers
Pricing			
Answering your questions			
Processing the subscription of your contract	Performance of the contract or pre-contractual measures	Us and the Insurer(s)	
Management of your contract (producing an offer, calculating and collecting your premiums, issuing your insurance policy documents, managing your claims, monitoring the risks insured, producing reports to the insurers of your contract, etc.)			
Create and improve our products, services and processes			
Measurement and continuous improvement of the quality of our services (possible recording of your letters and telephone exchanges for analysis, and contact by telephone, e-mail or sms for satisfaction surveys) Statistical and actuarial analyses	Legitimate interest or consent	Us	Service providers
To carry out commercial prospecting			
Contact by e-mail, telephone or mail to propose APRIL offers Communication of your data to identified partners	Legitimate interest or consent (depending on the communication channel)	Us	Service providers
Fighting insurance fraud			
Detection of attempted fraud Management of identified cases of fraud in order to prevent unjustified applications from being processed (a list of persons at risk of fraud may be drawn up)	Legitimate interest	Us and the Insurer(s)	Insurers and reinsurers of your policy Your intermediary Service providers



Why do we collect it?	On what basis?	Who is responsible for this?	Who do we communicate it to?
Meeting our legal obligations			
Fight against money laundering and terrorist financing and application of financial sanctions	Legal obligation	Us and the Insurer(s)	Insurers and reinsurers of your policy Your intermediary Public Authorities Service providers Our Parent company
Compliance with accounting and tax rules Audit of accounts	Legal obligation	Us	Service providers Statutory Auditors
Incident handling Handling of requests to exercise your personal data rights			
Manage complaints and disputes			
Processing of complaints	Legal obligation	Us and the Insurer(s)	Service providers The Regulatory Authorities for the processing of complaints
Management of possible amicable or contentious procedures and establishment of proof of our obligations (to prove the existence or not of an insurance contract or the respect of our legal obligations or to defend us in case of litigation)	Legitimate interest	Us	Service providers
Manage digital spaces			
Maintain the proper functioning and security of our digital spaces, in particular access to our websites, online spaces (Insured Area, subscription space, etc.) and mobile applications	Legitimate interest	Us and/or Our parent company	Service providers
Use of cookies or tracers for the proper functioning of our websites and mobile applications, as well as for audience measurement and advertising purposes as described in the cookie policy accessible on our websites and applications	Legitimate interest or consent	Us, Our parent company and/or third party cookie vendors	Service providers Third-party cookie vendors (see cookie policy on the relevant website)
Controlling and managing our business			
Internal control and audit to monitor our activities and the proper functioning of our processes and activities	Legitimate interest	Us	Our Parent company Service providers
Measuring and reporting on our business activities	Legitimate interest	Us	Our Parent company Service providers



3.2. Processing your health data

We may collect, through questionnaires or other means, data about your health on our behalf and that of the Insurer as joint data controllers.

Your health data is then processed by us and by the Insurer:

- **With your consent**, for the purposes of, creating and improving our products, services and processes and for carrying out statistical and actuarial studies; **in this case You have the right to withdraw it at any time (see section 4.2. How to exercise your rights?)**.
- **To meet our legal obligations**, for the purposes of the fight against money laundering, terrorist financing, for combating insurance fraud, and for the processing of complaints.
- **To fulfil our contractual obligations**, for the purposes of, pricing, contracting, management and performance, including: risk assessment, managing your claims and any disputes, managing appeals, monitoring risk.

This data may only be transmitted for these purposes to the Insurer and to the reinsurers requested within the framework of the study and management of your contract as well as to the service providers commissioned by Us or by the Insurer within this framework (for example the medical practitioners or payment providers).

3.3. Who has access to your data?

- **The companies of April International**, listed in section 4.2, **and Our parent company**, April SAS, for the purposes and according to the methods described in this document. Within our departments, only those persons who need to know your data in the context of their duties have access to it.
- **The organisations and service providers listed in the table in Appendix 1**, for the purposes and according to the methods described in this document, within the strict framework of their missions. Our service providers include our IT service providers and payment providers.

3.4. Where is your data processed?

- On the territory of Singapore, Hong Kong SAR, The Philippines, Vietnam, Thailand, China and Indonesia, UAE, and France.
- However, they may be transferred to countries outside these territories.

In the event of a transfer, including transfers to an affiliate or parent company, we will ensure the execution of a data sharing agreement or use of a contract or other reasonable means to provide a comparable level of protection while the personal data is being processed by the third party.



3.5. How long will your data be kept?

The length of time your data is kept depends on the purpose for which it was collected. These are detailed in the following table:

For what purpose?	For what maximum duration?
In case of a quotation without subscription	2 years
For the subscription, the management of your contract and the processing of claims and disputes	Duration of your contracts with us and the subsequent 10 years
To create and improve our products	
For the control and management of our activity	
For the fight against money laundering, terrorist financing and insurance fraud	
To fulfil our legal obligations	
For the continuous improvement of our services	2 years
For commercial prospecting	1 year
For the proper functioning and security of access to our websites, Insured Area/subscription areas and mobile applications	
For the use of cookies	According to the duration defined in the cookie policy of the site concerned

4 Your rights

4.1. What are your rights?

- **Right of access.**
- Right to **erase** data that is inaccurate, incomplete, ambiguous, outdated or whose processing is unlawful.
- **Right of rectification.**
- The right to **set up guidelines for the retention, deletion and disclosure** of this data after your death.
- Right to **object**.
- Right to **restrict processing**.
- Right to **portability**.

4.2. How to exercise your rights?

You can exercise your right to access your personal data by sending a written request to our Data Protection Officer (DPO – e-mail: Privacy@april.com) or in writing to the relevant company below.

If your request was not granted, or if you feel your request was not sufficiently addressed, you may file a formal complaint with the regulatory agency in your country. Before doing so, however, we recommend that you inform us so that we can try to address your concern.



1 Contact our **Data Protection Officer (DPO)**

If necessary, a photocopy of your identity document may be requested in order to verify your identity.

Entity	Location	Email
APRIL Singapore Pte Ltd, April Singapore Assistance Pte Ltd	2A McCallum Street, Singapore 069043	Privacy@april.com
APRIL Hong Kong Limited, and for policies issued in UAE	9th Floor Chinachem Hollywood Centre, 1-13 Hollywood Road, Hong Kong, SAR	
APRIL Assistance (Thailand) Co Ltd. and APRIL Brokerage (Thailand) Co. Ltd.	518/3 Maneeya Center North 10th Floor Ploenchit Road, Lumpini, Pathumwan Bangkok 10330, Thailand	
APRIL Vietnam Company Limited	Unit 201, 2nd Floor, Lafayette Building 8 Phung Khac Khoan Street, Da Kao Ward, District 1 Ho Chi Minh City, Vietnam	
GlobalHealth (Shanghai) Enterprise Management Consulting Company Limited	Suite 2228, 22F Tomson Commercial Building 710 Dong Fang Road Pudong, Shanghai 200120, China	
For policies issued in Indonesia and the Philippines	c/o April Singapore Pte Ltd, 2A McCallum Street, Singapore 069043	

2 You can submit a complaint to the Regulatory Authority in the country in which your insurance policy is underwritten:

Regulatory Authority	Location	Tel/ Fax	Email
Hong Kong The Privacy Commissioner for Personal Data	Room 1303, 13/F, Dah Sing Financial Centre, 248 Queen's Road East, Wanchai, Hong Kong	Fax: (+852) 2877 7026	complaints@pcpd.org.hk
Singapore The Personal Data Protection Committee ("PDPC")	10 Pasir Panjang Road, #03-01 Mapletree Business City Singapore 117438	Tel: (+65) 6377 3131 Fax: (+65) 6577 3888	info@pdpc.gov.sg
Thailand Office of the Personal Data Protection Committee	Ratthaprasasanabhakti Building (Building B) The Government Complex, 7 th Floor, Chaeng Wattana Road, Lak Si District, Thung Song Subdistrict 10210	Tel: (+66) 02 111 8800	saraban@pdpc.or.th
China The Cyberspace Administration of China ("CAC")	225 Chaoyangmennei Da Jie, Beijing, China, 100010	Tel: (+010)88050686	premier@mail.gov.cn english@mail.gov.cn
Vietnam The Vietnam Cybersecurity Emergency Response Team/Coordination Centre – VNCERT/CC	5th Floor, Building 115 Tran Duy Hung – Trung Hoa Ward – Cau Giay District – Hanoi City	Tel: (+84) 243640 4421 Hotline: (+84) 0869 100317	ir@vncert.vn vncert@mic.gov.vn / office@vncert.vn
The Philippines The National Privacy Commission	5th Floor, Philippine International Convention Center, Vicente Sotto Avenue, Pasay City, Metro Manila 1307	Tel: (+63) 8234- 2228	info@privacy.gov.ph dpo@dti.gov.ph
Indonesia Kominfo	Jl. Medan Merdeka Barat No.9, RT.2/RW.3, Gambir, Kecamatan Gambir, Kota Jakarta Pusat, Daerah Khusus Ibukota Jakarta 10110, Indonesia	Tel: (+62) 21 3452841	kontak@kominfo.go.id
Dubai International Financial Centre ("DIFC")	Dubai International Financial Centre, The Gate Building, Level 14, P. O. Box: 74777 Dubai, UAE	Tel: (+971) 43622222	info@difc.ae



3 In the cases below, you can exercise your rights as follows:

● In cases of **commercial prospecting**

- You can unsubscribe from email communications by clicking on "Unsubscribe" in the emails you receive, or by emailing us at privacy@april.com.

This registration has no impact on the management of your policy, for which we may contact you by telephone or e-mail.

● In cases where **your consent is required**

- You have the right to withdraw your consent at any time.
However please be aware that the withdrawal of your consent can make it impossible to continue administering your policy and it does affect the processing already carried out.
- How do you do it?
Please e-mail us at privacy@april.com.



Appendix 1

Below you can find further information about who we may share your data with.

Data recipients acting on behalf of (and instructed by) April				
Industry	Sector of activity	Sub-Sector of activity	Type of activity	Identity / Location of the recipient
Information Technology Service Providers	Operation of IT equipment	Maintenance	Maintenance of IT Equipment & database hosting	Cloud-based customer relationship management providers with data centres in the USA, EU and Hong Kong SAR
		Messaging, CRM, Communication	Messaging, CRM, Communication	Cloud-based customer relationship management providers with data centres in the USA, EU
		Claims Processing	Claims Data Entry	Cloud-based customer relationship management providers with data centres in the EU and Singapore
	Electronic communication	E-mails	Operation and hosting of the messaging system	Software as a service providers with data centres in the EU
		Marketing	Propose APRIL offers, provide service updates and satisfaction surveys	Social networks and e-mail marketing companies headquartered in USA
	Digital Workplace	Microsoft Office 365 suite	Hosting and operating the O365 suite	Software as a service providers with data centres in the EU
Assistance providers	Medical and travel assistance		Emergency assistance and management of medical claims	Assistance companies located in the country in which your insurance claim occurs.

Third party data recipients (acting independently from April)			
Industry	Sector of activity	Type of activity	Identity / Location of the recipient
Health Insurers	Private Health Insurance	Insurance coverage	Licensed insurance companies located in the country of your insurance product (China, Hong Kong SAR, Indonesia, The Philippines, Singapore, Thailand, Vietnam, UAE). Reinsurance partners in EU, UK, Singapore
Telemedicine providers	Telemedicine	Providing second medical opinions, medical consultations, mental health consultations	Indonesia, Singapore, UAE, Spain
Financial institutions	Bank & payment providers	Collection of premiums and payment of claims	Financial institutions including banks and international payment providers in Hong Kong SAR, Singapore, Thailand, Vietnam, and UK
Public Authorities	Insurance Authority, police, etc.	Exercise of investigating power	In the country of your insurance product (China, Hong Kong SAR, Indonesia, The Philippines, Singapore, Thailand, Vietnam, UAE)
Audit, tax, accountancy and legal advisors	External Audit	Examination of quality standards	Licensed auditors and certified public accounts in Hong Kong SAR, Singapore, Thailand, Vietnam, China
	Accounting and tax	Examination of books of accounts	Certified public accounts and tax agents in Hong Kong SAR, Singapore, Thailand, Vietnam, China

We may also share your data with other independent data controllers acting with your consent, for example, your employer (if you are a member of a group policy), your insurance intermediary or financial advisor (if you have appointed one) and your medical practitioners (in the event that you need to make a claim or ask us to confirm details of your insurance coverage to them).