



Lacson & Lacson's PRIVACY NOTICE

When you engage *Lacson & Lacson Insurance Brokers, Inc.*'s services, you trust us with your personal information. This Privacy Notice is meant to help you understand the data we collect, why we collect it, and what we do with it. This is important; *we hope you will take time to read it carefully.*

Our Commitment Lacson & Lacson Insurance Brokers, Inc. is committed to protecting, respecting, and upholding your data privacy rights. Our Privacy Policy explains how we collect, hold, process, use, disclose, and dispose personal information. We would like you to feel confident about how the personal information you provide to us is managed.

What we collect When we arrange insurance on your behalf, manage your insurance program or policy, and assist in an insurance claim, we ask you for personal information and sensitive personal information, including but not limited to:

- **Names of insured and beneficiaries with their personal circumstances** (birthdate, age, gender, nationality, address, contact information)
- **Medical records** (diagnosis/health complaints, confinement /claims details, prescribed medications, laboratory results, medical certificates, results of annual physical examination, if applicable)
- **Government-issued IDs** (government-issued number, biometrics)
- **Company profile & details**
- **Financial details** (benefits, insurance payments, bank account)
- **Transaction history** (your communications and interactions with us, providers, and other entities regarding your insurance, and data captured by our surveillance system when you visit our offices)
- Other Data required to be collected under the Insurance Commission and Anti-Money Laundering Council (AMLC) issuances.

When you provide us the data of another person, you represent that you are authorized and have obtained the requisite consent. When you designate a minor as a beneficiary or dependent of your insurance program, we will collect the information from you as the parent, legal guardian, or your company.

When local regulations permit or so require, we may also source the above and other categories of personal information from third parties such as in compliance with our anti-money laundering and sanctions screening duties.

Why We Collect Them We collect, hold, process, use, and disclose your Personal Information and Sensitive Personal Information in the following manner and for the following purposes:

- To respond to your inquiries and requests, improve our services, and resolve your concerns;
- To establish and maintain communication with you;
- To confirm you are our client and to verify your identify, and to validate your coverage;
- To arrange coverage in accordance with your requirements with insurers and providers;
- To manage your insurance, including placement, renewal, invoicing, and client surveys;
- To properly administer the services, benefits, and fulfill our obligations under our service contract;
- To assist, manage, and process your claims, including healthcare insurance claims, where we may obtain, examine, and process medical records, as well

as request for these on your behalf, in order to facilitate settlement of your claim;

- To provide you with relevant information, updates, and announcements regarding our services;
- To implement measures to prevent or deter money laundering and terrorism financing;
- To comply with our legal obligations or comply with law enforcement;
- To prevent a threat to life or health; or
- To perform other activities you have consented to.

The information that you share with us during any of these processes, whether online or otherwise, will be handled with due care and confidentiality and in adherence to our information security policies. These also enable us to perform our business in a sound manner in the prevention of fraud and to ensure the protection of our stakeholders.

Who Collects Your Data and How to Contact Them

Your data shall be collected through various means including hardcopies of application forms and the like, e-mail, telephone, or through correspondence with your company representatives whom you have entrusted your data with, and only by authorized employees who shall also be responsible with its secured processing. Collection may be done by our Client Care Executives, Corporate Account Executives, Account Officers, or Business Development Officers. No collection shall be done without your prior consent or without a legal basis. No data shall be collected that is in excess of the specified purpose.

With Whom Will We Share the Data

We share your data for legitimate purposes, in compliance with our contractual and regulatory obligations, or on a need-to-know basis. We will transfer only the data necessary to fulfill the purpose/s, and ensure to transfer the data in a secure manner.

We may share the information with our legal counsel, auditors, and service providers who we engage with for support services or in the fulfilment of our obligations. We may also share them with insurers and their underwriters, healthcare providers and medical professionals, adjusters, and other relevant third parties for them to assess whether they may insure you, at what price, and at what terms they would be willing to do so. If they are already insuring you and the information submitted is in respect of a claim, the information will be used to facilitate settlement of your claim.

Where possible, we may share anonymized or statistical data with other parties to limit the processing of your personal data.

In cases not required by law, such arrangements are covered by the appropriate data sharing agreements and non-disclosure/confidentiality agreements to ensure the same level of protection is observed by the third party.

Where a valid request from a competent authority is received, we may also submit your information to such agencies or regulators for the fulfilment of their functions.

How We Protect your Information

We take reasonable and appropriate physical, technical, and organizational measures to protect and safeguard the personal information you have provided us and ensure that it is:

- *Handled in a lawful manner;*

- *Stored in a safe physical facility and protected from any unauthorized access and unlawful use;*
- *Protected from unintended destruction, modification, and alteration.*

Our servers are routinely scanned, backed up and maintained to mitigate possibilities of data breach or any unauthorized accessing of personal information. Our employee representatives are trained on how to reasonably safeguard your personal information in line with our privacy practices.

We do not sell, trade, or rent out your personal information to others.

We also advise you to refer to the privacy notice of your insurer for information on how they handle your information.

Storage and Retention

All information collected, in both electronic and physical forms, are stored in our main office and will be retained only for as long as reasonably necessary to fulfill the purposes for which these were collected or to comply with any applicable legal or regulatory requirements, unless a longer retention period is required or permitted by law.

In particular, documents related to our anti-money laundering obligations shall be retained for as long as our business relationship exists and five (5) years from the termination. Meanwhile, tax-related transactions are required to be retained for ten (10) years.

Upon request or upon fulfillment of the purpose or expiration of the period for which retention of the personal information was necessary, physical copies of documents shall be retained in our main office for another one (1) year for record-keeping purposes. After this period has lapsed, it shall be archived and transferred to a secure off-site storage location for another three (3) years until it is securely disposed. As for the electronic documents, it shall be deleted from our system servers permanently and hard copies will be shredded and properly disposed in a manner to prevent further processing, or unauthorized access or disclosure. However, we may further process these such that the information is no longer traceable to you, and render them anonymous or in statistical form for our business analytics practices.

Integrity and Retention of Personal Information

We will keep your information accurate, complete, and up-to-date. If you wish to access the Personal Information in our records, or believe your information is inaccurate, incomplete, or not up-to-date, you may notify our representatives or contact our Data Protection Officer. We may contact you for supporting documents before we act on the request.

Upon request or upon fulfillment of the purpose or expiration of the three (3) year period after the termination of our business relationship for which retention of the personal information was necessary, it shall be deleted in our system servers permanently and hard copies will be shredded and properly disposed.

Your Rights and How to Exercise Them

- The right to be fully informed, to access your Personal Information, and to request for a copy of the Personal Information we have on file.
- The right to request for your Personal Information to be rectified or updated, to ensure that your Personal Information on file is reliable, accurate, complete, and as current as possible. We will be happy to assist you with this,

subject to receipt of a written request or a request made through our recorded lines.

- The right to request for your Personal Information to be erased or deleted from our files. By withdrawing your consent, however, please note that we may not be able to provide you with any of our services.
- The right to report any misuse of your Personal Information. With rights, however, come responsibilities including, for example, the expectation that you will provide complete and accurate information to us, as your insurance advisor.

Changes and Updates to This Privacy Policy

Our Privacy Policy may change from time to time to comply with applicable laws and regulations and to reflect changes to our information practices. We will post updates in our website, and if the changes are significant, we will provide a more prominent notice (such as an e-mail notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Contact Us

For any inquiries, feedback, or requests regarding our Privacy Policy, you may contact our Data Protection Officer through the following:

E-mail: privacy@llibi.com

Address: 15/F Burgundy Corporate Tower, 252 Sen. Gil Puyat Ave.,
Makati City, Metro Manila, Philippines.

We commit to respond to you within 10 days of receiving your complaint, inquiry, or feedback.

Updated August 5, 2022