

PRIVACY NOTICE

When you engage the services of *Lacson & Lacson Insurance Brokers, Inc.*'s ("we", "us"), you entrust us with your personal information. This Privacy Notice is intended to discuss what data we collect, our reasons for collecting it, and our data handling practices. Please review this carefully to understand our practices.

Our Commitment

Lacson & Lacson Insurance Brokers, Inc. is committed to safeguarding your privacy and upholding your rights regarding your personal data. This policy details our methods for collecting, using, disclosing, and managing your personal information, ensuring transparency and accountability.

What we collect

We collect personal and sensitive personal information necessary for arranging and managing insurance policies, claims assistance, and compliance with regulatory requirements, 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 issuances of Insurance Commission, Anti-Money Laundering Council, and other regulatory entities, as may be applicable.

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 under your insurance program, we will collect the necessary information from you, whether you are the parent, legal guardian, or acting on behalf of your organization.

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 process your personal and sensitive information to:

- respond to your inquiries, enhance our services, and address concerns;
- maintain effective communication;
- confirm your membership and verify your identity and coverage;
- arrange suitable insurance coverage with insurers and providers which may include preparing and securing insurance quotations;
- arrange suitable insurance placement, renewal, invoicing, and surveys;
- properly administer the contracted services, benefits, and obligations;
- facilitate claims processing and settlement including healthcare claims which involve obtaining, examining, and processing of medical records;

- share relevant service information, updates, and announcements to the members;
- implement Anti-Money Laundering and Terrorism Financing measures;
- comply with legal obligations or law enforcement requirements;
- mitigate risks to life or health; or
- conduct other activities subject to your prior consent.

Your information, whether shared with us electronically or manually, is managed securely and confidentially, following our strict information security policies to prevent fraud and protect our stakeholders.

**Who Collects Your
Data and How to
Contact Them**

We collect data via physical forms, emails, phone calls, or company representatives authorized by you. Collection is conducted exclusively by authorized personnel such as Client Care Executives, Corporate Account Executives, Account Officers, or Business Development Officers, and always with your consent or based on legal grounds. Collection is limited strictly to necessary data.

**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 such partners are already providing you insurance coverage 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 employ reasonable physical, technical, and organizational safeguards to protect your data from unauthorized access, misuse, loss, or modification. Our servers undergo regular scans, backups, and maintenance to prevent breaches. Furthermore, employees are trained in data security and privacy practices.

We do not engage in selling, trading, or renting your personal data.

To understand how insurers handle your information, we recommend reviewing each of their respective privacy notices separately.

Storage and Retention All data, whether electronic or physical, is stored securely at our main office with electronic back-up maintained in the cloud, and retained as necessary to fulfill its original purpose or comply with legal or regulatory obligations. Anti-Money Laundering documentation is retained during the business relationship plus five (5) years thereafter; tax-related records are kept for ten (10) years.

Upon the expiration of necessary retention periods or fulfillment of purposes, physical documents remain at our office for an additional year before being archived securely off-site for three years, after which they are destroyed securely. Electronic records are permanently deleted from our system servers, and physical records are shredded and disposed securely. We may anonymize data for business analytics, rendering it untraceable to you.

**Integrity and
Retention of Personal
Information**

We strive to maintain accurate, complete, and current personal information. For data access or correction requests, please contact our representatives or Data Protection Officer. Requests may require supporting documentation. Following the required retention period or upon request, your information is permanently deleted from our electronic systems and securely disposed of physically, if with hardcopies.

**Your Rights and How
to Exercise Them**

- The right to be fully informed, to access your personal and/or sensitive personal information, and to request for a copy of the personal and/or sensitive personal information we have on file.
- The right to request for your personal and/or sensitive personal information to be rectified or updated, to ensure that your personal and/or sensitive 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 and/or sensitive 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 and/or sensitive 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.

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