

# PERSONAL DATA PROTECTION POLICY RELATING TO CIGNA EUROPE INSURANCE COMPANY S.A.-N.V. – SINGAPORE BRANCH

Personal data protection in Singapore is regulated by the Personal Data Protection Act 2012 (the “PDPA”), which is fully in force on and from 2nd July 2014. The Do Not Call Registry obligations came into force on 2nd January 2014.

This Policy describes in summary our practices in connection with personal data processed through the Cigna systems, and mobile applications we use to communicate with you. Please review it carefully.

## Our Personal Data Protection Commitment

Cigna Europe Insurance Company S.A.-N.V. – Singapore Branch (“Cigna”) is committed to the responsible management, use and protection of personal data of our customers and users of our systems. Any personal data processed through our systems is subject to the requirements of the PDPA.

This Policy is designed to assist you in understanding how Cigna collects, uses, discloses and/or processes the personal data you have provided to Cigna, as well as to assist you in making an informed decision before providing Cigna with any of your personal data.

## Personal Data Processed

“Personal Data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access.

- > The personal data processed by Cigna includes:
- > Name, address, email address, and birthdate which is supplied by you, or your broker on your behalf;
- > Financial and health information;
- > Cigna ID;
- > Password and PIN;
- > Medical claims status and information;
- > Plan information including benefits and coverage;
- > Eligibility information; and
- > Other personal data supplied by our customers and users.

## How We Collect Personal Data

Cigna will collect your personal data in accordance with the PDPA. Cigna will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits Cigna to collect and process your personal data without your consent.

## How We Use Personal Data

We collect, use and/or disclose personal data for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:

- > **Transactions and Management of your relationship with us.** We use personal data for processing, dealing with and/or completing transactions, responding to your requests and administering/managing your relationship with us, for example, to process claims or insurance payments, provide plan information, administer your policy, search for health care providers, ensure that you obtain services and treatment you may need, or to allow you to view and print information about your plan. This includes Cigna considering your application for a policy with Cigna.
- > **Communications.** We use personal data to send administrative information to you in order to administer and/or manage your relationship, account and/or policy with us, or to deal with your requests or instructions, for example, information regarding changes to our terms, conditions, and policies, or providing a quote for the product(s) or service(s) you have applied for. Except as permitted by law or with your consent, we will not use your personal data for marketing purposes.
- > **Customer Service.** We use personal data to provide and improve customer services, including through any chat or similar feature available through our services, to deal with and/or manage your relationship, account and/or policy with us, or to deal with your enquiry or request.
- > **Authentication.** We use personal data in order to authenticate you or confirm your identity when you return to our customer interface site.
- > **Conducting our business.** Where consented by you, we use personal data for data analysis, that is integral or required for our business, in order to improve our services to you, to benefit you, to developing new products, to enhance, improve or modify our services, to identify usage trends, to determine the effectiveness of our promotional campaigns and to operate and expand our business activities.
- > **Research.** We may use your personal data for research purposes, but only according to and as allowed by law.
- > **Compliance with the law and legal process.** We may collect, use and disclose your personal data in order to carry out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by Cigna; to investigate fraud, misconduct, any unlawful action or omission, whether relating to your application, your claims or any other matter relating to your policy or policies, whether such policy is issued by Cigna or another Insurer, and whether or not there is any suspicion of the aforementioned (“Insurer” means any insurer or company operating insurance business in Singapore); and to comply with applicable law in administering and managing your relationship with Cigna;
- > **Data Storage.** We may also store, host, back up (whether for disaster recovery or otherwise) your personal data in servers located within and outside Singapore.
- > **Other.** We use personal data for other purposes which we notify you of at the time of obtaining your consent.

(collectively, the “Purposes”)

As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

### **How We Disclose Personal Data**

We may/will need to disclose your personal data to third parties, whether sited in Singapore or outside of Singapore, for one or more of the above Purposes as well as the following purposes:

- > **Payment.** We may share personal data with your broker (if you have one), plan sponsor, administrator, financial or health service providers to obtain payments, including premiums for your coverage, or to make coverage determinations, and to coordinate benefits with other coverage you may have, and to otherwise determine and fulfill our responsibility to provide your health benefits – for example, to administer claims.
- > **Health care operations.** We share personal data to provide customer service, to support and/or improve the programs or services we offer you, to assist you in managing your health, or to support another insurer, or health care professional who has a relationship with you for activities such as case management, care coordination and quality improvement activities.
- > **Disclosure to other Insurers.** We may also disclose personal data to other Insurers for one or more of the above Purposes.

We may also disclose your personal data to third parties, without first obtaining your consent, as permitted or required by law, which may include, without limitation, the following:

- > cases in which the disclosure is required or authorized based on the applicable laws and/or regulations;
- > cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- > cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- > cases in which the disclosure is necessary for any investigation or proceedings;
- > cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- > cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- > where such disclosure without your consent is permitted by the PDPA or by law.

The instances listed above are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA which is publicly available at <http://statutes.agc.gov.sg>.

In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties, whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third party service

providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

Sharing with Affiliates. In addition, Cigna Europe Insurance Company S.A.- N.V. Singapore branch may share personal data with Cigna Corporation and other affiliates, for one or more of the Purposes, to ensure that we are meeting our contractual obligations on a 24/7 service delivery promise and to support our operations. Please view here a list of affiliates who may access or receive personal data:

Cigna Global Insurance Company Ltd.  
Cigna Health and Life Insurance Company  
Cigna Life Insurance Company of Canada  
Cigna Life Insurance Company of Europe S.A.- N.V.  
Cigna Worldwide Life Insurance Company Limited (Hong Kong)  
Life Insurance Company of North America  
Cigna Corporate Services LLC  
Connecticut General Life Insurance Company

Note that personal data may be shared with recipients located in countries that provide different legal protection for personal data.

Other than for the purposes described in this Policy or as permitted by applicable law, we will obtain your written authorization to use or disclose your personal data.

### **How We Administer And Manage Your Personal Data**

We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.

We understand the importance of protecting your personal data. We restrict access to your personal data to authorized workforce members who need that information for legitimate purposes such as but not limited to your treatment, for payment purposes and/or for health care operations. We maintain technical, physical and administrative safeguards to ensure the privacy of your personal data.

To protect your privacy, only authorized and trained workforce members are given access to our paper and electronic records and to non-public areas where this information is stored. Workforce members are trained on topics including:

- > Privacy and data protection policies and procedures including how paper and electronic records are labeled, stored, filed and accessed.
- > Technical, physical and administrative safeguards in place to maintain the privacy and security of your personal data.

Our corporate Privacy Office monitors how we follow the policies and procedures, and educates our organization on this important topic.

We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies, and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

## Your Individual Rights

### **Request for access and/or correction of personal data**

You may request to access and/or correct the personal data currently in our possession or control by submitting a request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. Hence, please submit your request to us using the usual forms of communication e.g. phone and/or email.

For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.

We may also charge you a reasonable fee for the handling and processing of your requests to access your personal data. If we make a charge, we will advise you at the time you contact us and then proceed with the request once the payment is made.

For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:

- (a) correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request; and
- (b) subject to the paragraph immediately following this, we will send the corrected personal data to every other organisation to which the personal data was disclosed by us within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

Notwithstanding the paragraph immediately above, we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

### **Request to withdraw consent in relation to your personal data**

You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting a request to us (refer to our contact information below).

We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us/the contract you have with us will have to be terminated.

### **Cookies**

We must advise you we use cookies. These are small bits of computer code embedded into web pages to help you navigate through our websites. If you choose to disable cookies, you may find parts of our sites do not work. You can read more about cookies at [www.CignaGlobal.com/Cookie-Policy](http://www.CignaGlobal.com/Cookie-Policy).

### **Contact Us & Complaint Process**

If you, at any time, have any queries on this Policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer.

If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we also welcome you to contact our Data Protection Officer with your complaint or grievance.

Please contact our Data Protection Officer through one of the following methods:

**E-mail: [Singapore.Feedback@Cigna.com](mailto:Singapore.Feedback@Cigna.com)**

(kindly use the word "PDPA" in the subject line)

### **Address:**

Cigna Europe Insurance Company S.A.-N.V. – Singapore Branch  
Attn: Data Protection Officer  
152 Beach Road  
#26-05 The Gateway East  
Singapore 189721  
Fax: +65 6391 9530

## **Policy Availability and Duration**

Policy availability. A copy of this Policy is available for you to view, print, and/or download on [www.Cigna.com.sg](http://www.Cigna.com.sg) and click Personal Data Protection Policy.

Right to change terms of this Policy. We may change the terms of this Policy at any time, and we may, at our discretion, make the new terms effective for all of your personal data in our possession, including any personal data we created or received before we issued the new Policy.

If we change this Policy, we will update the Policy on our website and, if you are enrolled in a Cigna Global Healthcare Business plan at that time, we will send you the new Policy, as required. In addition, you can obtain a copy of the new Policy upon request when you call the International Service Centers or from our website.

You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

Effective date. This Policy is effective as of July 2014.

## **Useful Links**

Personal Data Protection Commission Singapore:

[www.pdpc.gov.sg](http://www.pdpc.gov.sg)

Do Not Call (DNC) Registry:

[www.dnc.gov.sg](http://www.dnc.gov.sg)