

Privacy notice

Addendum for Mainland China

Swiss Life (Singapore) Pte. Ltd.

Swiss Life (Singapore) Pte. Ltd. (hereinafter also referred to as “we”, “us”, or “our”), as the case may be, is the controller and processor of your personal data and you may reach us via dpo.sin@swisslife.com.

This Privacy Notice Addendum is a part of our Privacy Notice and specifically applies to individual customers located in mainland China who receive our products and/or services from Singapore. In compliance with mainland China's laws, we may need your consent on how we use your personal data. For certain personal data considered sensitive under Chinese laws, separate consent may be required. Your personal data will be collected, accessed, processed, used, stored, and/or transferred outside of mainland China. Without your consent to this Privacy Notice Addendum, we may be unable to provide the products or services you are purchasing from us.

Basis for processing Personal Data

Under mainland China's data protection laws, we will process your personal data based on your consent, except in the following circumstances where your personal data are:

- necessary to conclude or perform a contract you are a party to;
- necessary for compliance with legal obligations;
- necessary to respond to public health emergencies;
- necessary to protect an individual's life, health, and property safety;
- reasonably processed for public interest in news reporting and public opinion oversight; and
- publicly available due to voluntary disclosure or legal requirements, processed reasonably.

Sensitive Personal Data

Certain personal data we collect is classified as sensitive personal data under Chinese laws ("Sensitive Personal Data"), including but not limited to financial accounts, national identification numbers, health-related information, or data of minors under 14. We collect Sensitive Personal Data for specific purposes, such as assessing insurance policy applications and investigating claims.

We generally do not collect personal data directly from children under 14, but may collect such data from their guardians when necessary for providing services. Parents or legal guardians may exercise the minor's rights under the Privacy Notice. We comply with all relevant rules concerning Sensitive Personal Data.

Retention of Personal Data

We will retain your personal data as long as necessary to fulfil the purposes outlined in the Privacy Notice and this Addendum. Retention periods are determined based on:

- ongoing relationship with you;
- legal obligations; and
- our legal position (e.g., statute of limitations, litigation, audits, regulatory investigation).

Personal data will be securely deleted or disposed of after the retention period, unless legally required to retain certain data.

Sharing Personal Data with recipients

We may share your personal data with various recipients, including agents, brokers, reinsurers, third-party service providers, medical institutions, affiliated companies, auditors, legal advisors, financial advisers, regulators, banks, payment settlement agents, third-party payment service providers, and claims investigation organizations. These recipients will collect, process, and return your personal data to us for administration of your insurance policies and provision of services.

Types of personal data shared include all data outlined in the Privacy Notice, such as personally identifiable information, medical information, health records, and financial information. Data may be delivered electronically or by other means to recipients. We implement maximum security measures in compliance with Chinese laws for controlling, processing, and transferring personal data and Sensitive Personal Data.

Security policies

We adopt strict security policies to safeguard your personal data and Sensitive Personal Data.

Rights to access and deletion

In addition to access rights in the Privacy Notice, you have the right to obtain a copy of your personal data held by us and request deletion under these circumstances:

- processing purposes have been achieved, failed, or data is no longer necessary;
- we cease providing products or services, or retention period has expired;
- you withdraw your consent; and
- violation of applicable data protection laws and regulations.

Compliance and changes

In case of inconsistencies with this Privacy Notice Addendum, Chinese cybersecurity and data protection laws (including Cybersecurity Law, Personal Information Protection Law, Data Security Law) and their implementing measures will prevail.

Effective date and updates

This Privacy Notice Addendum has been in effect since 9th October 2024. We reserve the right to change, modify, add, or remove portions of this Privacy Notice Addendum at any time. Check this page periodically for updates. Continued use of this website after changes means acknowledgment of these changes. The updated versions will include date stamps to indicate when the Privacy Addendum was last revised.

Consent

You are considered to have read and understood this Privacy Addendum Notice and consent to us processing your personal data and Sensitive Personal Data as outlined in this document.

Withdrawal of consent

You may withdraw your consent for us to use your personal data by contacting us using the details provided in this Privacy Addendum Notice. Please note that withdrawing your consent may prevent us from offering you the relevant products and/or services. Additionally, we may need to verify your identity if you request information about yourself or a close relative.