

Privacy Statement

Pioneer Insurance & Reinsurance Brokers Private Limited (Hereinafter "PINC Insurance") is a composite insurance brokerage house, registered with Insurance Regulatory Development Authority of India (IRDA) as composite Insurance Broker having License no.118 (valid upto 23/02/2021) providing direct general and life insurance broking services in India and reinsurance services across the world. PINC Insurance is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us. This Privacy Statement applies to the websites and all - services offered by PINC Insurance's mobile applications which are 1) PINC Insurance, 2) PINC Strides Health Insurance, and 3) PINC CRM and all .

Scope Of The Statement

This Privacy Statement ("Statement") explains PINC Insurance information processing practices. It applies to any personal information you provide to PINC Insurance and any personal information we collect from other sources. This Statement is a statement of our practices and of your rights regarding your personal information. This is not a contractual document, and it does not create any rights or obligations on either party beyond those which already exist under data protection laws.

This Statement does not apply to your use of a third party site linked to on this website and various mobile applications.

Responsibility of your information

Throughout this Statement, "PINC Insurance" refers to Pioneer Insurance & Reinsurance Brokers Private Limited, including but not limited to its affiliated companies and subsidiaries (also referred to as "we", "us", or "our").

Some of the services which PINC Insurance provides to its clients are provided as a processor, which means that the Client remains primarily responsible for your information. In these circumstances, we may re-direct a query about our use of your information to our client.

Personal Identification Information

PINC Insurance may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site/applications, register on the site/applications, place an order, subscribe to the newsletter and online advertisement as well, respond to our telecalling advisors, and in connection with services and other activities, services, features or resources we make available on our Website and Applications. Users may be asked for, as appropriate, name, email address, mailing address, phone number, credit card information. Users may, however, visit our website and applications anonymously. We will collect personal identification information from Users only if they voluntarily submit such

information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Website and Applications related activities.

If PINC Insurance uses your personal information, you will have certain important rights, which you can exercise. The rights you will be able to exercise will depend on how and why PINC Insurance uses your information.

The primary point of contact at PINC Insurance for questions regarding your personal information is, 1219, 12th Floor, Maker Chambers V, Mumbai – 400021, Maharashtra, India.

Non-personal Identification Information

We may collect non-personal identification information about Users whenever they interact with our Website/Applications and any associates site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Website/Applications, such as the operating system and the Internet service provider utilized and other similar information.

Collection of Information

PINC Insurance collects - information in the following ways:

- **When we perform services for our clients.** Our services - includes insurance broking, claims management, risk management consulting, other forms of insurance services (including but not limited to marketing of insurance and reinsurance services), employee benefits program, administration of claim management and settlement and other ancillary services associated with such type of services. In these cases, your personal information will normally be provided to us by our clients (or advisors or service providers acting on behalf of our clients), or sometimes our clients may ask us to contact you directly. We may also need to obtain information from third parties such as insurance companies, insurance brokers or aggregators, credit organizations, motor vehicle and driver licensing authorities, financial institutions, medical professionals and publicly available sources.
- **When you request a service from us.** For example, if you ask us to obtain insurance quotes on your behalf, or if you contact us as a representative of your employer to enquire about a professional service you would like us to offer to your company.
- **When you register with or use any of our websites or applications and when you visit our advertisement.**
- **When you visit PINC Insurance site (directly or any affiliated or associated website) or attend an event.** You may provide this information directly, or it may be provided by your employer or colleagues.

- **When you apply for a position at PINC Insurance or any of our Group Companies.** You may provide this information directly (through an online recruitment portal, careers site or via correspondence), or it may be provided via an agency.
- **If you contact us with a feedback or complaint or query.**
- **When you engage with us over social media.**

What information do we collect?

Information you provide to us

When you request services, we ask that you provide accurate and necessary information that enables us to respond to your request. When a visitor provides personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection, for example providing an insurance quote, applying for a position at PINC Insurance or creating a profile on a website or application.

Information we collect from clients or third parties

When we provide the services listed above for our clients, we may collect personal information such as your name, address and location details, contact details, date of birth, gender, marital status, financial details, employment details, and benefit coverage. We may also collect (in each case as strictly relevant to the services we provide) sensitive information about you, such as health information in relation to life, health, professional liability and workers compensation insurance or employee benefit programs sponsored by your employer. Most of the personal information we receive relates to your participation in the compensation and benefits programs offered by your Service Provider or employer.

More information about the personal information collected for each of our services, together with the purpose and legal basis for collecting the information, will be provided to you in separate privacy notices, which are relevant to the services, which affect you.

We will not collect any sensitive information through our website or application unless this is required. Sensitive information includes a number of types of data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. We suggest that you do not provide sensitive information of this nature unless we specifically request this information.

If you provide us with sensitive personal information, you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this Statement. If you provide personal information about other individuals such as employees or dependents, you must obtain their consent prior to your disclosure to us.

Information we collect over PINC Insurance Sites, various Mobile Applications and Social Media

For purposes of this Statement, "website" and also includes our mobile applications.

We may ask you for some or all of the following types of information when you register for events, request services, manage accounts, access various content and features or directly visit our websites, applications and through any accessible third party links. This includes, but is not limited to:

- Contact information, such as name, e-mail address, postal address, phone number and mobile number;
- User name, password, password reminder questions and password answers;
- Communication preferences, such as which newsletters you would like to receive;
- Search queries;
- Contact information about others when you refer a friend to a particular site or service (note: this information is used solely to facilitate requested communications); and
- Information posted in community discussions and other interactive online features.

In some instances, we automatically collect certain types of information when you visit our websites, applications and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons.

Social Media

You can engage with us through social media websites or through features such as plug-ins or applications on PINC Insurance Sites that integrate with social media sites. You may also choose to link your account with us to third party social media sites. When you link your account or engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

If you post information when you interact with our websites including mobile applications through social media sites, plug-ins or other applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on some social media sites. For more information about how you can customize your privacy settings and how third party social media

sites handle your personally identifiable information, please refer to their privacy help guides, privacy notices and terms of use.

Mobile Devices

If you access our websites on your mobile telephone or mobile device or any other portable devices, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system including storage facilities, mobile carrier and your location information as well as your mobile camera. We may also ask you for consent to provide your mobile phone number (for example, so that we can send you push notifications) and we may call you for certain clarification / additional information for providing better services (which means waiver of Do Not Disturb (DND) or DNC or NCPR service from your side).

Third party websites including TPA / Associated links

Users may find content on our Site that links to the sites and services of insurance companies including TPA, associated links which may appear on our Site and applications for online sale and servicing of insurance policies. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including applications which have a link to our Site, is subject to that website's own terms and policies.

Use of Personal Information

The following is a summary of the purposes for which we use personal information. More information about the personal information collected for each of our services, together with the purpose and legal basis for collecting the information, will be provided to you in separate privacy notices, which are relevant to the services that affect you.

Performing services for our clients

We process personal information, which our clients provide to us in order to perform our professional consultancy and risk based advisory services. This may impact you, for example, where you are the employee of our client or member. The precise purposes for which your personal information is processed will be determined by the scope and specification of our client engagement, and by applicable laws, regulatory guidance and professional standards. It is the obligation of our client to ensure that you understand that your personal information will be disclosed to PINC Insurance.

Administering our client engagements

We process personal information about our clients and the individual representatives of our corporate clients in order to:

- carry out "Know Your Client" checks and screening prior to starting a new engagement;
- carry out client communication, service, billing and administration;
- deal with client complaints;
- administer claims.

Contacting and marketing our clients and prospective clients

We process personal information about our clients and the individual representatives of our corporate clients in order to:

- contact our clients in relation to current, future and proposed engagements;
- send our clients newsletters, know-how, promotional material and other marketing communications;
- invite our clients to events.

Conducting data analytics

PINC Insurance is an innovative business, which relies on developing sophisticated services by drawing on our experience from prior engagements. PINC Insurance is not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of PINC Insurance's activities are ensured through the use of aggregated or otherwise de-identified data.

Other uses

- Improve customer service - Information you provide helps us respond to your customer service requests and support needs more efficiently;
- Improve our Website/ Applications - We may use feedback that you have provided to improve our products and services;
- We may use User information when placing an order only to provide service to that order. We do not share this information with outside parties except to the extent necessary to provide the service;
- Determine eligibility and process applications for products and services;
- Provide information (other than your personal information, like your name, address, email address or telephone number) with Insurance Companies, third-party advertising companies and/or ad-agencies to serve advertisements when you visit our Website /Applications;
- Understand and assess customer's ongoing needs and offer products and services to meet those needs;
- Conduct data analysis;
- Execute monitoring and training;
- Develop new services;
- Market products and services (subject to appropriate consent); and
- Conduct processing necessary to fulfill other contractual obligations for the individual.

If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

Legal basis

All processing or use of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract (e.g. where we help an employer to fulfill an obligation to you under an employment contract in relation to the delivery of employee benefits);
- the processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators); or
- the processing is in our legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use personal information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party).

In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any special categories of data, we will establish a lawful exemption which will allow us to use that information. This exemption will typically be:

- your explicit consent;
- the establishment, exercise or defense by us or third parties of legal claims; or

Information from Children

Our websites and mobile applications are not directed to children and we do not knowingly collect personal information from children on our websites and mobile applications. Children are prohibited from using our websites and mobile applications.

Retention of Your Personal Information

How long we retain your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information for the period necessary to fulfill the purposes described in this Statement unless a longer retention period is permitted by law and in accordance with the PINC Insurance Record Retention Policy.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Disclosure of Information

Within PINC Insurance

We may share your personal information with other PINC Insurance divisions to serve you, including for the activities listed above.

We do not rent, sell or otherwise disclose personal information about our online visitors with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances discussed below.

Business Partners

We disclose personal information to business partners who provide certain specialized services to us, or who co-operate with us on projects. These business partners operate as separate controllers, and are responsible for their own compliance with relevant laws. You should refer to their privacy notices for more information about their practices.

Example include:

- *Insurance broking and insurance services*- Insurers, reinsurers, other insurance intermediaries including valuers and surveyors, insurance reference bureaus, fraud detection agencies, our advisers such as loss adjusters, lawyers and accountants and others involved in the claims handling process.

Authorized Service Providers

We may disclose your information to service providers we have retained (as processors) to perform services on our behalf (either in relation to services performed for our clients, or information which PINC Insurance uses for its own purposes, such as marketing). These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, 'Use of Personal Information.'

Examples include:

- IT service providers who manage our IT and back office systems and telecommunications networks;
- marketing automation providers;
- contact center providers.

These third parties appropriately safeguard your data, and their activities are limited to the purposes for which your data was provided.

Legal Requirements and Business Transfers

We may disclose personal information

- (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request.
- (ii) in response to law enforcement authority or other government official requests,
- (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss,
- (iv) in connection with an investigation of suspected or actual illegal activity or
- (v) in the event that PINC Insurance is subject to a merger or acquisition to the new owner of the business.

Disclosure may also be required for company audits or to investigate a complaint or security threat.

Transmission of Information Collected

Our organization has its footprint across India and business across the globe and may transfer certain personal information across geographical borders to PINC Insurance entities, authorized service providers or business partners in India and other countries working on our behalf in accordance with applicable laws. Our affiliates and third parties may be based locally or they may be overseas.

When we do, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data:

- we ensure transfers within PINC Insurance are covered by agreements based on the standard contractual clauses as per Indian Laws, which contractually oblige each member to ensure that personal information receives an adequate and consistent level of protection wherever it resides within PINC Insurance;
- where we transfer your personal information outside PINC Insurance or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us as noted below. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

Security for Protection of Information

The security of your personal information is important to us and PINC Insurance has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

What choices do you have about your personal information?

We offer certain choices about how we communicate with our customers and what personal information we obtain about them and share with others. When you provide us with personal details, if we intend to use those details for marketing purposes, we will provide you with the option of whether you wish to receive promotional e-mail, SMS messages, telephone calls and postal mail from us. At any time, you may opt out from receiving interest-based advertising from us by contacting us.

You may also choose not to receive marketing communications from us by clicking on the unsubscribe link or other instructions in our marketing e-mails, visiting the My Account section on our website including mobile applications , or contacting us as noted below.

How can you update your communication preferences?

We take reasonable steps to provide you with communication about your information. You can update your communication preferences in the following ways.

- *Profile*

If you have created a profile or account on one of our websites, you can update your contact information after you log into your account.

- *Newsletters*

If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

- *Mobile Devices*

If you previously chose to receive push notifications on your mobile device from us but no longer wish to receive them, you can manage your preferences either through your device or the application settings. If you no longer wish to have any information collected by the mobile

application, you may uninstall the application by using the uninstall process available on your mobile device.

- *E-mail*

Contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing and your requested changes.

If we do not provide you with access, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

Other rights regarding your data

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfill your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to Access

You have right to access personal information which PINC Insurance holds about you. If you have created a profile, you can access that information by visiting your account.

Right to Rectification

You have a right to request us to correct your personal information where it is inaccurate or out of date.

Right to be Forgotten (Right to Erasure)

You have the right under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.

Right to Restrict Processing

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or

- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

Right to Data Portability

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

Right to Object to Processing

You have the right to object the processing of your personal information at any time, but only where that processing is has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

International Transfers

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside India.

Cookies

Our website and mobile applications uses cookies. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site and services.

We may use cookies in the following ways:

- Where they are essential to make our site work
- To enable the personalisation features on our site (which give you the ability to recall recently viewed pages and see information which you have input on line)
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our site. We cannot identify you personally in this way.

Contact Us

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing

consent, or would like to make a complaint about a breach of the Act or this Statement, please contact the Compliance Officer: Mr. Sanjay Kabra

Changes to this Statement

We may update this Statement from time to time. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page.

We encourage you to periodically review this Statement so that you will be aware of our privacy practices.

Your acceptance of these terms

By using this Site and applications as mentioned above, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site and applications. Your continued use of the Site and applications following the posting of changes to this policy will be deemed your acceptance of those changes.

This Statement was last updated on August 31, 2019.

Insurance is the subject matter of the solicitation. For more details on benefits, exclusions, limitations, terms and conditions, please refer sales brochure/policy wording carefully before concluding a sale.