

Personal Information Collection Statement (Employment-related Personal Data)

Data Protection Policy

Liberty International Insurance Limited (the "Company") recognises its responsibilities in relation to the collection, holding, processing or use of Personal Data of its employees under the Personal Data (Privacy) Ordinance. For the purpose of this Statement, "Personal Data" means any data:

1. relating directly or indirectly to a living individual
2. from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and
3. in a form in which access to or processing of the data is practicable

Personal data will be collected during your job interview process, at the start of your employment and in the course of your employment. They will only be collected for lawful and relevant purposes, and all practicable steps will be taken to ensure that personal data held by the Company is accurate, kept secure, and that no unauthorised or accidental access, erasure or other use occurs. If you have any queries please consult Head of Human Resources Services, Hong Kong.

Purpose

To process, administer and/or manage your employment relationship with us, we will necessarily need to collect, use, disclose and/or process your personal data. Such personal data includes (i) information about you set out in the Company's various forms and documents and any other personal information provided by you, possessed by us, obtained by us, or which was or is collected in the course of your employment, whether now or in the future.

It may be necessary for you as our employee to provide the Company with your personal data for purposes related to employment, including:

1. processing an employment application
2. human resources management and administration, such as: planning and implementing staffing and training, promotions, transfers, secondments and other career related matters; reviewing, implementing and administering our employee benefits (such as pensions, insurance and medical benefits); forecasting and budgeting; global recruitment; succession planning; human resources statistical analysis and payroll administration
3. preparing Company marketing materials and/or directories identifying the names, office telephone numbers, email addresses and other contact information of employees for promotional and/or administrative purposes
4. providing employee references
5. departmental communications



6. monitoring compliance with the Company's rules
7. to comply with any legal or regulatory obligations in Hong Kong or overseas
8. evaluating future employment opportunity with our parent and affiliated companies, both locally and overseas ("Liberty Mutual Group of Companies")
9. investigating infringements of the law or policies of Liberty Mutual Group of Companies (including disciplinary and grievance matters)
10. establishing, exercising or defending legal rights of any member of the Liberty Mutual Group of Companies
11. facilitating global cooperation, communication and teamwork within the Liberty Mutual Group of Companies
12. providing a global directory
13. cross-border team work; investment decisions; accounting and cross-charging for salary and other compensation expenses among Liberty Mutual Group of Companies that benefit from contributions by employees of data exporter
14. providing third party benefit plans administration services and assisting Liberty Mutual Group of Companies in discharging essential functions regarding its benefits plans
15. facilitating the administration of "whistleblower" hotline ("Helpline") to provide for internal audits and investigation related to the Helpline
16. carrying out internal audits and investigations for Liberty Mutual Group of Companies in case of certain employee misconduct, enforcing the Liberty Mutual Group of Companies' Code of Conduct
17. carrying out due diligence or other screening activities (including background and probity checks) in accordance with legal or regulatory obligations or our risk management procedures that may be required by law or that may have been put in place by us
18. facilitating, administering, processing, dealing with and/or managing your application for and/or involvement in any events and seminars that we make available to employees
19. providing, allowing access to, administering or maintaining computer hardware and software systems used by us
20. maintaining, reviewing and developing our business systems, procedures and infrastructure, including testing or upgrading our computer hardware and software systems
21. other purposes directly relating to any of the above; and



22. any other purposes we notify you at the time of obtaining your consent

Please note that if you are unable to supply your personal data as requested, the Company may be unable to (i) if you are a job applicant, process your employment application; or (ii) if you are an employee, to provide you with employee benefits or take other actions related to your employment (such as administering employment benefits) where use of your personal data is required.

Please ensure that you provide complete and accurate personal data to us and keep us updated on any changes to your personal data. Kindly note that if you do not provide complete and accurate personal information to us as and when it is required, it may have adverse consequences for you as we would be relying on such personal data to make decisions about you such as ascertaining promotion, administering benefits.

Transfer of Personal Data

Your personal data will be kept confidential and may be held or stored locally, regionally or globally, whether in Hong Kong or out of Hong Kong.

Subject to the provisions of any applicable law, we may need to disclose your personal data to third parties, whether located within or outside Hong Kong for one or more of the above Purposes. Your personal data may be:

1. made available to appropriate persons in the Liberty Mutual Group of Companies on a “need-to-know” basis
2. supplied to the Data Center of Liberty Mutual Group of Companies for processing, storage, and/or backup of Personal Data. Such Data Centers are/may be located in Singapore, elsewhere in Asia, the United States of America, Europe and Latin America or such other countries/territories as determined by the Liberty Mutual Group of Companies from time to time
3. supplied to a global human resources information system (“HRIS”) which is a global tool that assists the Liberty Mutual Group of Companies administer human resources and employee compensation at an international level. Liberty Mutual Group of Companies in the USA may host such respective servers or may utilise third party servers which Liberty Mutual Group of Companies would be the controller
4. supplied to any agent, contractor or third party who provides administrative or other services to the Company in Hong Kong or elsewhere. Examples of such persons include: external auditors, medical practitioners, pension administrators, trustees, insurance companies, bankers, actuaries, and any consultants/agents appointed by the Company to plan, provide and/or administer employee benefits
5. supplied with your consent to persons seeking employee references
6. supplied to an organisation involved in conducting probity checks or monitoring employee conduct
7. disclosed to government departments or regulatory authorities in Hong Kong or elsewhere, such as the Inland Revenue Department and the Labor Department



8. made available to any actual or proposed purchaser of Company business or, in the case of a merger, acquisition or other public offering, the purchaser or subscriber for shares in Liberty Mutual Group of Companies
9. supplied to an organisation involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems
10. provided to your representatives including your legal advisers
11. made available to third parties in the form of Company marketing materials and/or directories identifying the names, office telephone numbers, email addresses and other contact information for key officers, senior employees and their secretaries, assistants and support staff for promotional and/or administrative purposes
12. used, disclosed or transferred for any purpose directly related to an individual's employment or prospective employment within Liberty Mutual Group of Companies
13. made available to anyone to whom you have given your consent
14. Supplied to whom the Company is under an obligation to make disclosure under the requirements of any law binding on the Company or any of its associated companies for the purposes of any regulations, codes or guidelines issued by governmental, regulatory or other authorities with which the Company or any of its associated companies are expected to comply
15. Supplied to person pursuant to any order of a court of competent jurisdiction and
16. Made available to other Company's authorised service providers to provide services to the employees for the above purposes for which the personal data are to be used

You acknowledge and agree that, in transferring the information referred to above and carrying out the above activities, your personal information may be transferred to, accessed, controlled and processed by entities located outside of Hong Kong and who may act on behalf of any member of the Liberty Mutual Group of Companies.

You should note that where your personal information is disclosed to or accessed by parties located outside of Hong Kong as provided above, your personal information may not be afforded the same protections as it is under Hong Kong law.

Access and Correction of Personal Data

Under the Personal Data (Privacy) Ordinance, you may ascertain whether the Company holds your personal data, obtain a copy of the data, and correct any data that is inaccurate. You may also request that the Company inform you of what type of personal data it holds. Please note that a reasonable fee may be charged to offset the Company's administrative and other costs to comply with your request.



Requests for access, correction or information regarding policies, practices and kinds of data should be addressed in writing to:

Head of Human Resources Services
Liberty International Insurance Ltd,
13/F Berkshire House,
25 Westlands Road, Quarry Bay, Hong Kong

Governing Law and Jurisdiction

These terms and conditions and the rights and obligations contained hereunder shall be governed by and construed in accordance with the laws of Hong Kong. The courts of Hong Kong shall have the exclusive jurisdiction to hear and determine any suit or proceeding, and to settle any dispute or claim, which may arise out of or in connection with these terms and conditions and the parties hereby irrevocably submit to the jurisdiction of such courts.

