

# Privacy Policy GDPR

## Introduction

At WellAway®, your privacy is pivotal. When you visit [www.WellAway.com](http://www.WellAway.com), you count on us to be thorough and serious about protecting your privacy online, in addition to providing you with reliable and quality products and services. To be successful in both aspects, we need to gather certain types of data and information that will help serve you best.

This Privacy Statement applies to all the products and services offered by WellAway Limited (“WellAway”).

## What kind of information does [www.WellAway.com](http://www.WellAway.com) collect?

- We have created the website to collect automatic tracking data. This allows us to see which topics interest you most. Automatic tracking information is gathered by capturing how you reached our website by following a link from another, external website, as well as tracing your movement through WellAway.com. The route visitors take informs the team about who visits our website. But no personally identifiable information is gathered because of the aforesaid. We use aggregate numbers to collect stats, track the website usage and its trends. Additionally, we use the date to ascertain compatibility between systems and technologies. We can then customize results and find the products and services best suited to your needs.
- Individualized information is not currently collected on the website, but we do capture on an individual basis first, where you navigated to us from, to then aggregate this data to evaluate marketing efficiency.
- We only collect personal information when you voluntarily submit it to us.
- When you apply for a quote, we, as any other quote engine, will require personal information to supply you with the correct prices and information. This might include your name, address, e-mail, phone number, gender, and birth date. When you submit an online insurance application for an insurance product we offer, we may request sensitive information such as details of your health relating to you or your dependents. We may also ask for other information about you, such as your credit card information (when you are making a purchase).
- You may choose not to provide us with any personal information. In that case, you can still access and use many portions of our websites; however, you will not be able to access and use those portions of any WellAway® website that require your personal information.
- We might also use cookies. For detailed information on our use of cookies and your rights and options in relation to this, please consult our [Cookie Policy](#).

## How does WellAway® use the information it collects on me?

- We use the personal information that you provide us to fulfill your request for our products, to respond to your inquiries about what we offer, and to provide you with other WellAway® products or services that may be of interest to you in accordance with the respective data protection laws. We may use this information to communicate with you.
- We will use the personal information that you provide about others (such as dependents in your application) to provide the products or services that you have requested. If you provide WellAway® another person's personal information as a referral, that information can be used, according to and in compliance

with applicable data protection law, to present them with products, services and offers, as well as invitation to use our website.

- Please ensure other parties have agreed for you to pass on their personal information to us before you do so.
- If you provide us with your contact information such as email or physical location, we will not trade, sell, rent or disclose them in any other way to third parties other than as described in the “Purpose of data collection” section.
- **Opt-out:** If you do not wish for your e-mail or postal address to be shared within WellAway’s affiliate companies or business lines you can opt out, by using the contact information on this website.
- You may also opt out of the receipt of any marketing materials from WellAway itself by using the contact information on this website.
- We may securely transfer your personal information and/or sensitive personal information to other WellAway offices (outside your country) for internal management and administrative purposes. In addition, your personal data will be securely transferred to other WellAway offices where necessary for the performance or conclusion of our contractual obligations to you or for your benefit. Transfers of personal information may also be made where necessary for the establishment, exercise, or defense of legal claims.
- WellAway may securely share sensitive personal information with outside companies or individuals, that may be sited in or outside of your country, for legitimate purposes including the following circumstances:
  1. **Trusted recipients.** Before sharing any personal information with outside parties, we require that these parties agree to process such information based on our instructions and in compliance with this Privacy Statement and any other appropriate confidentiality and security measures. We might use trusted businesses or persons to process personal information on our behalf including social media marketing.
  2. **Requirements (legal and/or safety).** In good faith, we may securely process information for the following requirements:
    - Comply with applicable law, regulation, or legal process;
    - Detect, prevent, or otherwise address fraud, security, or technical issues;
    - Enforce the terms of agreements & policies on our website; or
    - Protect against damage or harm to the right or safety of WellAway, its users, or the public as required and permitted by law.
    - **More purposes.** On certain occasions we may need to share your sensitive information outside of the conditions listed in this Privacy Statement, but first we will ask you for permission. This only applies to sensitive personal information.

## Purpose of data collection

### Services/Products

- We will/may collect, use, disclose and/or process your personal data for the purposes listed below:
  - (1) To consider and accept to provide you and yours with the plan or product you applied for. This includes us considering your application for a policy with WellAway and another insurer considering your application (whether now or in the future) for a policy with that insurer;
  - (2) Processing your application for underwriting and any approval process, including any other application that you may make (whether now or in the future) with another insurer;

- (3) Managing or administering your membership, account and/or policy with WellAway;
- (4) Dealing and processing any claims including the settlement of claims and any necessary investigations relating to the claims, under your policy or policies, whether such policy is issued by WellAway or another insurer;
- (5) Carrying out 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 WellAway, whether for this policy with WellAway or a policy with another insurer;
- (6) Answering any enquiries or request for quote by you;
- (7) Handling any matters relating to the services and/or products which you are entitled to under the policy which you are applying for or have applied (including the mailing of correspondence, statements, invoices, reports or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages);
- (8) Investigating any unlawful action or omission, fraud or criminal activities, whether relating to your application, your claims or any other matter relating to your policy or policies, whether such policy is issued by WellAway or another insurer.
- (9) Storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside your country;
- (10) Complying with applicable law in administering and managing your relationship with us;
- (11) Contacting you or communicating with you via phone/voice call, text message, email and/or postal mail for the purposes of administering and/or managing your relationship with us such as but not limited to communicating information to you related to any claims you have incurred or submitted, any additions, deletions, amendments to coverage for you and your covered family members or general queries you may have in relation to the policy in force. You acknowledge and agree that such communication by WellAway could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- (12) Developing and analyzing research and development activities (including but not limited to data analytics, surveys and/or profiling) to improve WellAway's services and facilities in order to enhance your relationship with us or for your benefit, or to improve any of WellAway's products or services for your benefit;
- (13) Complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities. For the avoidance of doubt, this means that we may/will disclose your personal data to the parties upon their request or direction

**Other purposes:**

- As the purpose for which we may/will collect, use, disclose or process your personal data depends 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 law.
- WellAway may/will also be collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes. To carry out or to deal with one or more of the Purpose, any other insurer may/can collect from WellAway (and WellAway may disclose to them), use, disclose (including disclose to WellAway) and/or process your personal data.
- Your personal data may/will be disclosed by WellAway to third parties, whether located within or outside

your country, for one or more of the above Purposes, as such third parties, would be processing your personal data for one or more of the above purposes.

#### **Our Website**

- In relation to your use of our Website, we may gather, disclose and/or process your personal data for one or more of the following purposes:
  - (a) Administering and/or managing your use of and/or access to the Website;
  - (b) Operating, administering and providing you the services and products on our Website;
  - (c) For identification and/or verification;
  - (d) For contacting you on matters relating to your transactions on the Website and your requested services on the Website, and any inquiries and/or requests submitted by you through the Website or otherwise;
  - (e) Social media marketing (upon your consent);
  - (f) For digital marketing information purposes such as direct mailers and updates about new products, special offers or other information which we deem useful or interesting to you and yours (if you have consented to the same); and/or
  - (g) Another purposes which we notify you of at the time of obtaining your consent.

The purposes above will also apply to your personal data for the Transaction and Website Management purposes.

#### **How does WellAway® protect the safety and integrity of the information?**

- We take appropriate digital and physical measures to protect your personal information. We use an array of security measures, such as encryption and authentication where required, to maintain the confidentiality. We keep your personal information behind protective programs such as firewalls, only accessible to specific employees, each of whom is required to keep the information confidential. We also take appropriate measures to secure the transmission of sensitive personal information from your computer to WellAway's computers.
- WellAway employees, agents, and contractors who have access to personal information are required to protect this information in a manner that is consistent with this Privacy Statement and may not use the information for any purpose other than to carry out the services they are performing for WellAway. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.
- WellAway gathers personal information that is necessary and important to the purposes for which it will be used. Though we do take appropriate steps to review and update the information that we store to ensure that it is accurate, complete, and current, we also depend on you to update or correct your personal information when necessary.
- To inquire about personally identifiable information that WellAway has collected about you, or to correct factual errors in that information, please use the contact information on this website.
- We use the data we gather for purposes consistent with this Statement. We will not use your sensitive personal information for any purposes other than those described in this Privacy Statement unless we have obtained your consent or if applicable law allows us to without your consent. If we propose to use your personal information for purposes beyond that explained in this Statement, we will provide notice before doing so and require consent, in accordance with any compliance regulation.
- Processes will be put in place where any personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that the purpose for which that personal data was

collected is no longer being served by the retention of such personal data; and/or retention is no longer necessary for any purpose.

**What if I need to edit, access or withdraw my consent?**

- You can contact us at [corpcompliance@wellaway.com](mailto:corpcompliance@wellaway.com). Please do not email individualized information unless the correct measures and encryption have been put in place. We have a policy that prohibits us from communicating individualized information through non-secure e-mails.

**Are links on your website secure?**

- We don't own or control all the websites linked from our website, therefore, we cannot guarantee they are secure and we cannot assume responsibility for their privacy practices. We advise you to review the privacy policies of any of the websites you visit once you leave this website.

**I have switched my coverage to another company. What will you do with my information?**

- We will continue to treat your information with the same confidentiality we provide all our distinguished members. As stated by data protection legislation, we will not keep your data longer than required. We may hold personal information for as long as it is necessary to do so, having regard to the purposes for which it was collected and the purposes for which it is to be further processed.

**Enforcement and Compliance with this Privacy Statement**

- Our Privacy Statement and the enforcement of it are priority and we regularly review our own compliance, accordingly. If you have any questions or concerns, or if you suspect that we have used your personal information in a manner not consistent with the policy or with applicable data protection law, please contact us at [corpcompliance@wellaway.com](mailto:corpcompliance@wellaway.com).

**You should also contact WellAway:**

- To request details of personal information that we hold about you (a small fee may be payable) – please let us know, which of your WellAway products and services you would like us to include in our reply, as well as the details of the information you would like to see
- If you no longer wish to receive information about our products and services, or would like details of the personal information we hold about you
- If you believe that any information we are holding on you is incorrect or incomplete or you would like us to remove any information that we have stored on you

You should not expect that all your personally identifiable information will be completely removed from our databases immediately upon request. In some cases, we will retain information, such as to resolve disputes, troubleshoot problems, or as required by our regulators. Information may never be completely removed from our databases due to technical constraints and the fact that we back up our systems.