

Privacy Policy

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PRISM MGA Hong Kong Limited and PRISM MGA Singapore Pte. Limited (together, “PRISM”, “we”, “us” or “our”) are committed to protecting the privacy of personal data. As a Lloyd’s coverholder, PRISM acts as a Managing General Agent for syndicates and insurers in the Lloyd’s market and is regulated in Hong Kong by the Insurance Authority and in Singapore by the Monetary Authority of Singapore.

This Privacy Policy explains how we collect, use, disclose, transfer, store and protect personal data, and the rights of data subjects under the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (the “PDPO”) and the Personal Data Protection Act 2012 of Singapore (the “PDPA”).

PRISM is a business-to-business specialty and facultative insurance organisation. This Policy primarily addresses how we handle personal data of individuals connected to our business counterparties — for example, named contacts at insureds, brokers, intermediaries, reinsurers, suppliers and other professional advisers — together with visitors to this website.

1. Scope of this Policy

This Policy applies to personal data we collect through this website, in the course of providing insurance underwriting and related services, and through any other interaction you have with PRISM. It applies to information about prospective, current and former insureds, claimants, brokers, business partners, suppliers, visitors to our offices and visitors to this website.

2. Categories of Personal Data We Collect

Depending on your relationship with us, we may collect the following categories of personal data:

- Identification and contact details — name, date of birth, nationality, identification document number, residential and business address, email and telephone number.
- Insurance and underwriting information — information necessary to assess risk, including occupation, business activities, claims history, prior insurance arrangements and beneficiary details.
- Financial information — limited information required to facilitate premium payment or claims settlement (we do not store full payment card details on this website).
- Claims information — details of incidents, third parties, witnesses, supporting documents and correspondence. PRISM writes specialty and facultative property and related lines and does not solicit or process health or medical data.

- Technical and usage data — IP address, browser type, device identifiers and pages visited, collected via cookies and similar technologies (see Section 11).

3. How We Collect Personal Data

We collect personal data directly from you, from your insurance broker or intermediary, from claims adjusters, third-party administrators, medical practitioners, legal advisers and other parties involved in a policy or claim, from publicly available sources, from credit reference and sanctions screening agencies, and from this website.

4. Purposes for Which We Use Personal Data

We use personal data for the following purposes:

- Considering and underwriting insurance risks and producing quotations.
- Issuing, administering and renewing insurance policies and certificates.
- Assessing, investigating, processing and settling claims.
- Recoveries, subrogation and dispute resolution.
- Risk assessment, portfolio analysis, pricing, reinsurance and aggregation reporting.
- Detecting, investigating and preventing fraud, money-laundering and other financial crime, including sanctions and watch-list screening.
- Complying with applicable law and our obligations to the Lloyd's market, the Hong Kong Insurance Authority, the Monetary Authority of Singapore, the Personal Data Protection Commission (PDPC), the Office of the Privacy Commissioner for Personal Data (PCPD), tax authorities and other regulators.
- Responding to enquiries, complaints and requests for access or correction.
- Management information, internal audit, training and quality assurance.
- Operational business communications with our brokers, insureds, reinsurers and other counterparties about policies, claims, market developments and PRISM corporate updates. PRISM does not undertake consumer direct-marketing activity.

5. Legal Basis and Consent

In Hong Kong, we collect and use personal data in accordance with the six Data Protection Principles set out in the PDPO. In Singapore, we rely on the consent, deemed consent or other lawful bases provided for in the PDPA, including where collection, use or disclosure is necessary for legitimate interests, evaluating a contract of insurance or managing a claim.

You may withdraw consent to the further collection, use or disclosure of your personal data at any time by contacting us using the details in Section 14. Withdrawal of consent may mean that we are unable to continue to provide a policy or service to you, and we will tell you the likely consequences before you withdraw.

6. Disclosure of Personal Data

We may share personal data with the following categories of recipients in connection with the purposes set out above:

- Lloyd's of London, the Council of Lloyd's, Lloyd's syndicates and managing agents on whose behalf PRISM underwrites risks.
- Insurance brokers, intermediaries and producers involved in placing or servicing a policy.
- Reinsurers and retrocessionaires.
- Claims handlers, loss adjusters, surveyors, medical examiners, investigators and legal advisers.
- Third-party administrators (TPAs) and outsourced service providers, including IT, hosting, document management and analytics providers.
- Auditors, professional advisers and corporate affiliates within the PRISM group.
- Credit reference, fraud-prevention, sanctions-screening and identity-verification agencies.
- Regulators, law-enforcement, courts and tax authorities, where required or permitted by law.
- A prospective purchaser or successor in connection with a corporate transaction, subject to appropriate confidentiality protections.

We require third parties who handle personal data on our behalf to do so in accordance with our instructions and with security measures comparable to our own.

7. International Transfers of Personal Data

Because insurance is a global business and the Lloyd's market operates across many jurisdictions, we may transfer personal data outside Hong Kong and Singapore, including to the United Kingdom, the European Economic Area, the United States and other jurisdictions where Lloyd's syndicates, reinsurers, brokers or service providers are located. Where we transfer personal data outside Singapore, we take steps to ensure that recipients are bound to provide a standard of protection comparable to that under the PDPA, for example through contractual safeguards. In Hong Kong, transfers are conducted in accordance with the PDPO and the PCPD's guidance on cross-border transfers.

8. Retention of Personal Data

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, to comply with our legal, regulatory, accounting and reporting obligations, to defend or pursue legal claims, and to support the Lloyd's market's long-tail liability requirements. Typical retention periods are:

- Policy and underwriting records: for the duration of the policy and for at least seven (7) years after expiry, or longer where required by law or the Lloyd's minimum standards.
- Claims records: for at least seven (7) years after final settlement, and longer for liability classes where claims may be reported many years after the event.
- Marketing data: until you opt out or otherwise withdraw consent, and for a reasonable period thereafter to evidence the opt-out.
- Website analytics data: typically retained for no longer than twenty-six (26) months.

9. Security of Personal Data

We implement appropriate technical and organisational measures to safeguard personal data against unauthorised or accidental access, processing, erasure, loss or use. These measures include access controls, encryption of data in transit, secure hosting, confidentiality obligations on staff and service providers, and regular reviews of our information-security arrangements. In the event of a data breach that is likely to result in significant harm, we will notify the PDPC, the PCPD and affected individuals as required by applicable law.

10. Your Rights

Subject to applicable law, you have the right to:

- Request confirmation as to whether we hold personal data about you, and request access to that data.
- Request correction of personal data that is inaccurate, incomplete or out of date.
- Withdraw your consent to our use of your personal data, where consent is the basis on which we are processing it.
- Request information about how your personal data has been used or disclosed in the twelve (12) months preceding the request (Singapore).
- Lodge a complaint with the PCPD (Hong Kong) or the PDPC (Singapore) if you are not satisfied with our handling of your personal data.

Requests should be made in writing to the contact details in Section 14. We will respond to access requests within forty (40) days in Hong Kong, and within thirty (30) days in Singapore, or within such other timeframe as is prescribed by law. A reasonable fee may be charged in accordance with applicable law.

11. Cookies and Website Analytics

This website uses cookies and similar technologies to operate the site, remember your preferences, measure how the site is used and improve its performance. Strictly necessary cookies are set automatically and cannot be disabled without affecting site functionality. Other cookies are only set with your consent through the cookie banner displayed on your

first visit. You may withdraw or change your consent at any time through the cookie settings link in the website footer.

- svSession – maintains your session and enables core website functionality.
- bSession – supports session management and website performance during your visit.
- server-session-bind – maintains a secure connection between your browser and the server during your session.
- hs and XSRF-TOKEN – security cookies used to protect the website against malicious activity, including forgery attacks and automated abuse.
- consent-policy – stores your cookie consent preferences so that your choices are remembered.

12. Data Protection Officer and Group Privacy Contact

PRISM has appointed a Data Protection Officer in Singapore as required by the PDPA, and a Privacy Officer in Hong Kong. Both can be contacted at [PRISM EMAIL] or by writing to the addresses in Section 13.

13. How to Contact Us

If you have a question, concern or request relating to this Policy or your personal data, please contact us:

By email: info@prismmga.com

PRISM MGA Hong Kong Limited — Privacy Officer

Jason Smith jason.smith@prismmga.com

Address: 46th floor, Lee Gardens One,

33 Hysan Avenue, Hong Kong

T: +852 3905 1815

PRISM MGA Singapore Pte. Limited — Data Protection Officer

Jason Smith jason.smith@prismmga.com

Address: CapitaGreen, 138 Market Street,

#05-01 Singapore 048946

T: +65 6977 6903

14. Changes to this Policy

We may amend this Privacy Policy from time to time. The current version is always available on this website and is identified by the effective date shown at the top. We encourage you to review this page periodically.