



TOKIO MARINE  
KILN

# Privacy Notice

## Singapore

Empowered Expertise

This Notice will explain to you how TMK Singapore collect, use and share your personal data for the purpose of operating our business and managing our relationships with suppliers. If you are a job applicant, former employee, contractor or other individual who previously worked under a contracting arrangement with us, please contact us at [dpo@tokiomarinekiln.com](mailto:dpo@tokiomarinekiln.com) to understand how we may retain and use your personal data.

## Who are we?

In this Notice, when we refer to “TMK Singapore”, “we, us, or our”, we mean Tokio Marine Kiln Singapore Pte Limited.

Where your personal data is processed by other entities of Tokio Marine Kiln Group Limited or other entities in the Tokio Marine group, you should refer to the privacy notices of those companies.

## What personal data do we collect?

Personal data is any information that relates to a living person and that identifies you either directly from that information or indirectly, by reference to other information that we have access to.

The personal data that we collect, and how we collect it, depends upon how you interact with us.

The personal data that we collect includes:

- **Individual Details**

Name, address (and proof of address), other contact details (e.g. email and telephone details), gender, marital status, family details, date and place of birth, nationality, employer, job title and employment history, educational and technical qualifications, family details and their relationship to you, and your images/ photographs.

- **Identification information**

Identification numbers issued by government bodies or agencies (e.g. depending on the country you are in, national registration identification number or social security number, passport number, tax number, driver's licence number).

- **Financial information**

Income and other financial information.

- **Risk details**

Information about you which we collect in order to assess the risk to be insured and provide a quote. This includes information relating to your health, criminal convictions, or other special categories of personal data. For certain types of policies, this includes telematics data.

- **Health information**

Current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g. smoking or consumption of alcohol), prescription information and medical history.

- **Criminal records**

Criminal convictions, criminal offences (including driving offences) and related security measures.

- **Policy information**

Information about the quotes you receive and policies you take out.

- **Credit and anti-fraud data**  
Credit history and credit score, sanctions and criminal offences information received from various anti-fraud databases relating to you.
- **Previous and current claims**  
Information about previous and current claims, (including other unrelated insurances), which may include in some cases, surveillance reports.

### Who do we obtain your personal data from?

We collect personal data from various sources, including:

- you
- your family members, representative, employer or trade or professional associations
- other insurance market participants, such as insurance intermediaries (e.g. introducers, brokers, agents and coverholders), insurers and reinsurers
- credit reference agencies
- anti-fraud databases, sanction lists, court judgements and other databases
- government agencies such as vehicle registration authorities and tax authorities
- publicly available information including the open electoral register
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, legal advisors, and claims handlers
- suppliers providing products and services to us

### How do we obtain your personal data?

We collect personal data in the course of our business including:

- **When you request a service from us**  
For example, if you ask us to obtain insurance quotes, or if you contact us to make an enquiry about a product or a service that we provide.
- **Providing a service/ product to our clients**  
Our services and products include insurance products and services (including underwriting, coverholder services and insurance administration). In these cases, your personal data will normally be provided to us by our clients (or intermediaries acting on behalf of our clients), or sometimes our clients may ask us to contact you directly. We will also obtain information from other third parties (see [Who do we obtain your personal data from?](#)).
- **When you sign up to attend or attend one of our events**  
We will ask you to provide your personal data and those of your guest.
- **When you visit our business premises or attend our events**  
We collect information that we need in order to identify you, complete necessary security checks and for other security purposes.  
  
When you visit our offices, sign up for or attend any of our events, we may collect information to establish that you are not at risk of Covid-19 or other infectious illnesses.

We may also collect dietary, allergies and disability information for catering and your health purposes.

○ **When we engage or are proposing to engage the services or purchase products from a supplier**

We collect information necessary to administer our relationship with a supplier including review of our supplier’s capabilities and qualifications, communicate with our suppliers or proposed suppliers, make payments and recover money owed to us, and perform any ongoing monitoring and investigations where required.

○ **Whenever you contact us**

We retain a copy of your email or other correspondence as a record of your communication with us. This will include occasions when you contact us for a complaint, to enquire about our processing of your personal data or in relation to a general enquiry.

○ **Merger or acquisition**

If we are in a process of merger, acquisition or asset transaction, we may acquire your personal data from the involved third party.

**What purposes does TMK Singapore collect and use your personal data for?**

**Providing a service/ product to our clients**

- **Quotation/ inception**
  - Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
  - Evaluating the risks to be covered and matching to appropriate policy/ premium
- **Policy administration**
  - Client care, including communicating with you and sending you updates
- **Claims processing**
  - Managing insurance and reinsurance claims
  - Defending or prosecuting legal claims
  - Investigation or prosecuting fraud
- **Renewals**
  - Evaluating the risks to be covered and matching to appropriate policy/ premium
- **Support and other business activities**
  - Providing technical, customer service and other support
  - Responding to your queries and requests for information
  - Communicating with you in connection with providing a service/ product to our clients or prospective clients
  - Collecting or refunding payments

**Other business purposes**

- **Conducting data analytics**
  - General risk modelling
  - Other data analytics: Our business relies on developing products and services by drawing on our experience from prior engagements.

We are not concerned with an analysis of identifiable individuals, and we take steps to ensure that whenever appropriate, personal data is anonymised or pseudonymised.

<ul style="list-style-type: none"> <li>○ <b>Contacting and marketing to our clients and prospective clients</b> <ul style="list-style-type: none"> <li>- Sending newsletters and other marketing communications to individual representatives of our corporate clients or prospective clients</li> <li>- Inviting individual representatives of our corporate clients or prospective clients to events (and arrange and administer those events)</li> </ul> </li> <li>○ <b>Conducting surveys and other evaluations</b> <ul style="list-style-type: none"> <li>- E.g. customer satisfaction surveys and other surveys for research and analytical purposes</li> </ul> </li> </ul>
<p><b>Legal, compliance and corporate governance</b></p> <ul style="list-style-type: none"> <li>○ Manage queries, complaints and respond to data subject right requests</li> <li>○ Complying with our legal and regulatory obligations, and law enforcement requests</li> <li>○ Performing financial, tax and accounting audits, audits and assessments of our operations, privacy, security and financial controls, our general business, accounting, record keeping and legal functions</li> <li>○ Purposes related to any actual or contemplated merger, acquisition, asset sale or transfer, financing, dissolution or restructuring of all or part of our business</li> <li>○</li> </ul>
<p><b>Securing and protecting our business</b></p> <ul style="list-style-type: none"> <li>○ Protecting and securing our business operations, assets, services, network and information and technology resources</li> </ul>
<p><b>Visitors to our premises and attendees of our events</b></p> <ul style="list-style-type: none"> <li>○ To establish that you are not at risk of Covid-19 or other infectious illnesses</li> <li>○ Processing of your dietary, allergies and disability information for catering and your health purposes.</li> </ul>

**Who do we share your personal data with?**

**Within the Tokio Marine group of companies**

We are part of the Tokio Marine Holdings, Inc. group of companies operating throughout the world. Your personal data is shared with our group entities for the purposes of providing services between our group entities, for our general business administration, reporting or regulatory/ compliance purposes.

**Other companies**

We may disclose your personal data to or share it with:

○ **The relevant insurance market participants and other companies**

The insurance lifecycle involves the sharing of your personal data between the various insurance market participants and other companies.

We may disclose your personal data to our insurance partners and other companies such as brokers, other insurers, reinsurers, coverholders and companies who act as insurance intermediaries. These insurance market participants and other companies are

responsible for their own compliance with data protection laws. You should refer to their privacy notices for more information about their practices.

We may disclose your personal data to companies who process your personal data on our behalf, such as those who are involved in risk assessment, handling, investigation, defence or prosecution of claims, administration of insurance policies, loss adjustment and information providers such as screening, due diligence and anti-fraud databases.

o **Other authorised service providers**

We may disclose your personal data to service providers we have retained to provide services to us.

Certain service providers such as banks, financial organisations and advisers, auditors, lawyers and tax advisers are responsible for their own compliance with data protection laws.

Other service providers such as our marketing agencies, document management providers and IT service providers who manage our IT and back office systems process on our behalf, those personal data which they receive from us.

**Legal and regulatory obligations**

We will make disclosures in order to meet our legal and regulatory obligations to law enforcement agencies, government and regulatory bodies such as the Monetary Authority of Singapore and other regulators as required by law.

We may make disclosures of your personal data for the purposes of legal proceedings, obtaining legal advice and complying with our obligations under data protection and other laws.

**Mergers and acquisitions**

We may disclose your personal data in connection with the sale, transfer or disposal of any of our businesses to third parties.

**Withdrawing your consent**

Where we rely on express, implied or deemed consent to process your personal data, you have the right to withdraw your consent by contacting us. However, if you choose to withdraw your consent or choose not to provide Personal Data when we ask you for them, this may limit the services we can offer you.

**How can you contact us?**

You can contact us by post, or email at:

Data Protection Officer  
Tokio Marine Kiln Singapore Pte Limited, 138 Market Street, #03-04 CapitaGreen, Singapore 048946

[dpo@tokiomarinekiln.com](mailto:dpo@tokiomarinekiln.com)

**How often is this Notice updated?**

We regularly review and revise this Notice. We will ensure that the most up to date version is published here. This Notice was last updated on 11 August 2021.