

Privacy Notice

Cayman Integrated Healthcare Ltd. ("CIHL or Company") trading as One Health Cayman, is committed to respecting the privacy of every person who shares information with the Company. Your privacy is important to us, and we strive to take reasonable care and protection of the information we receive from you, the User. We adhere to the applicable laws in the Cayman Islands.

CIHL collects information in accordance with the applicable laws and is committed to take all reasonable precautions to preserve the integrity and prevent any corruption, loss, damage or destruction of the data and information. This Privacy policy outlines how we collect, use, disclose your Personal Information. It also provides you an overview of your rights.

Information Collected

You are required to provide certain information to use the services of CIHL. The Company and its authorized third parties shall collect or obtain Personal Information related to you through one or more of the following circumstances:

- Filling an Application Form:** By filling in the application form for availing our services which includes information such as first name, last name, date of birth, gender, email address, phone number, employment status, name of employer (if employed), immigration status, dependants' first name, last name, date of birth, gender, relationship status, immigration status, personal health information and health history details. While availing the Group Insurance service, we shall not be collecting or processing any personal information, directly from the members during the application stage, except for employers' name, physical address, mailing address, main phone number and the member's gender, date of birth, relationship (employee spouse and children), coverage level, medical plan and dental plan to provide a quote for the group. However, once the group accepts the proposal, we shall be collecting the member's detailed personal information such as name, email address and phone number to provide the required insurance coverage. Additionally, if the members opt for receiving the policy in their mailing address, we shall enable the same by collecting their individuals mailing address.
- Calling the Contact Center/Web enquiries:** Government identifiers such as your Driver's License number or Passport number, when you call or write directly to us for any service-related queries or issues.
- Processing of Claims:** Additional information may be required for the purposes of issuance of policies and processing of your refunds, claims, payouts, etc. This might comprise of your information such as health information, which may be received through your Provider, and bank account details for claims payout. For group application we shall be directly communicating with the individual member for their claims processing.
- Information related to Dependant:** You also consent to the use, disclosure and sharing of the personal information about you or with respect to other members covered under the policy, dependant(s) (whether collected by the Company or received from third-party insurance agencies or provided by you), including but not limited to information about you or your dependants' health, physical attributes, medical history, and lifestyle, etc. by the Company. This will help you avoid repeat queries/tests, and help you avail the additional products, services or other new offerings as per the terms of this Privacy Policy.

All information, documents, undertakings, and data provided by you should be true, current, and correct. It is important to note that any information received from you pertaining to your dependants must be acknowledged by you that you have permission to provide us with the required information and that they are aware of how we will process their data. In addition, we encourage you to share this with anyone whose personal information may be processed to administer a policy including handling any claims.

Consent

You acknowledge that you have provided your Personal Information out of your free will and after understanding how it will be used. You also consent that the collection, storage, processing, disclosure and transfer of any Personal Information shall not cause any wrongful loss to you, if it is done in accordance with the provisions of this Privacy Policy. However, we shall not be liable for any loss that may happen to you owing to the provision of wrongful Personal Information provided by you.

Withdrawal of Consent

You have the right to withdraw your consent at any point, provided such withdrawal of the consent is intimated to us in writing through an email at dpo@onehealth.ky requesting the same. You may note that the consent withdrawal process will be done within a reasonable time, not exceeding **30** days from the date of your request. If you wish to rectify the Personal Information that we may have collected to offer you personalized services and offers, you may write to the DPO (whose contact details are available in the subsequent sections), citing the reason for such rectification of Personal Information. Once you withdraw your consent to share the Personal Information collected by the Company, we shall have the option not to fulfil the purposes for which the said Personal Information was sought and the Company may restrict you from using our services or the website.

How do we use your Personal Information

1. Provide the services offered by us including but not limited to personalizing user experience and sending you information about your insurance policy, your premium due dates, claims settlement details, etc.
2. Undertake identity authentication to establish and verify your identity.
3. Undertake the on-boarding process or creation of your account.
4. conduct research and analysis to develop new products / services, improve our services / Platform, or to detect, prevent, mitigate, and investigate fraudulent or illegal activities.
5. Send you and/or your contacts (as permitted by you) notifications.
6. To enable us to comply with any legal and regulatory obligations or information requests by any authority under the applicable laws including to enable us to proactively communicate with CIMA, or law enforcement agencies or any other government or judicial body in connection with any suspicious, illegal, fraudulent, or unlawful activities.
7. To enforce our legal rights against you.
8. For enabling customer support to you including to help us respond to your pre-sale and post-sale requests and support needs, including any claims and/or payout requests, efficiently and without delay.
9. For enabling communication with you including for enabling marketing and outreach activities including promotion of new products, services, and/or platforms offered on or through the Platform.
10. To help avoid repeat tests or checks or questions to and by you, and to allow you / your applicants dependants to avail the additional products, services, or other new offerings.

11. To contact you / other members covered under the policy / Dependant or otherwise communicate with you / Dependant to offer new products, services, facilities, features and/or discounts, as appropriate.
12. Assess serviceability of services or features offered.
13. To assist you with exercising Data Subject Rights Requests
14. Perform internal operations necessary to provide our Services or the Platform, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends.
15. To contact you for refund or cancellation or confirmation of a purchase or failed transaction or the claims or payout process with respect to the Services, products and/or policies availed by you or wherein you have expressed interest or intent of purchase.
16. We use information to send you transactional communication. We might send you emails or SMS/es or messages through other technology enabled messaging apps or call you about your account, or use of the Services or the Platform or a policy purchase.
17. If you have not chosen to stop receiving marketing information, we will provide you with details about our products and services via email, postal letter, telephone or SMS unless and until we have been instructed not to. The simplest way to instruct us is to follow the instructions on the communication to unsubscribe.

Sharing of your Personal Data

1. Third parties such as but not limited to service providers for policy administration software, for enabling cloud services, to investigate and correct claims that resulted in denials, accounting of payables and receivables, bank and payment reconciliation, claim processing, business analytics, customer service support, document management and maintaining the financial ledger.
2. Demographic information to Hospitals, Pharmacies and Physicians to enable the required Healthcare services.
3. CIMA and Health Insurance Commission on periodic basis for regulatory compliances and audits.
4. Other Insurance companies, Insurance databases to enable settling of any insurance claims or for valid verification of information by other insurance providers.
5. Dependant /Nominees

Group Insurance

In case you avail our services through your employer by means of group insurance we shall collect information such as your first name, last name, gender, date of birth, contact details, dependant's information, employers' name and contact details.

In such cases we shall communicate with you directly for claims processing. We shall email you regarding your claim's actions. In case of you facing any issues in our portal, you may contact us directly via our call centre services, where our agents might collect your name, date of birth, insurance id for validation prior to facilitation of troubleshooting.

Transfer of your Personal Information

1. Once you have freely consented to share your Personal Information with us, you authorize us to exchange, transfer, share, part with all or any of your Personal Information, across borders and from your country to any other countries across the world with the Cloud Service Provider and the Company's affiliates / agents / third party administrators / service providers / partners or any other persons, for the Purposes specified under this Policy or as may be required by applicable law.
2. You acknowledge that some countries where we may transfer your Personal Information may not have data protection laws that are as stringent as the applicable local laws. You acknowledge that it is adequate that when CIHL transfers your Personal Information to any other entity within or outside the country, CIHL will place contractual obligations on the transferee such as Data Processing Agreements, including EU Standard Contractual Clauses, which will oblige the transferee to adhere to the provisions of this Privacy Notice

Data Subject Rights

You have certain data subject rights with respect to personal data belonging to you collected by the Company for the purposes mentioned in this Privacy Notice. The rights are available to you as per the Cayman Islands Data Protection Act, 2021 and/or other applicable laws:

1. Right to Access Information

You have the right to request for:

- a) a summary of personal data that is being processed and the processing activities undertaken with respect to such personal data.
- b) the identities of all other Data Subjects and Data Processors with whom the personal data has been shared by CIHL, along with a description of the personal data so shared
- c) any other information related to the personal data and its processing, as may be prescribed

2. Right to Correction or Erasure

You have the right to request for:

- a) Correct the inaccurate or misleading personal data
- b) Complete the incomplete personal data
- c) Update personal data
- d) Erasure of personal data

3. Right to stop processing

You have the right to request for stopping the processing of your Personal Data to:

- a) cease processing, or not to begin processing
- b) to cease processing for a specified purpose or in a specified manner
- c) to cease, or not to begin, processing for the purposes of direct marketing personal data relating to the data subject

4. Right to stop processing via Digital Marketing

You have the right to provide a notice by writing to cease, or not to begin, processing for the purposes of direct marketing personal data relating to you.

5. Right in relation to automated decision making

A data subject is entitled at any time, by notice in writing to a data controller, to require the data controller to ensure that no decision taken by or on behalf of the data controller that significantly affects the data subject is based solely on the processing by automatic means of the data subject's personal data for the purpose of evaluating the data subject's performance at work, creditworthiness, reliability, conduct or any other matters relating to the data subject

Security

We may collect and store your personal data in electronic and/or physical form, depending on the requirement. Information may be stored at our and third-party premises within IT Systems (e.g., external cloud storage, internal or third-party management systems, e-mails, databases, hard drives), document warehouses, etc.

We endeavour, where practicable, to process your personal data in a safe environment by preventing any unauthorized or unlawful processing of personal data or accidental loss or destruction of, or damage to, such information. We train our employees about the importance of maintaining the privacy and security of your Personal Data. We have implemented various physical, technical, and administrative security measures to protect your personal data and our network from unauthorized access. Some of these measures include:

- a. encryption
- b. strict adherence to privacy and security practices
- c. periodic security assessments and reviews to upgrade our practices
- d. restriction of access to personnel who have a need to know such data

How Do We Ensure Children's Privacy?

Some of our services and processes require collection of children's Personal Data. For such purposes we use appropriate lawful bases for the processing based on verifiable consent from the parent/legal guardian of the child. The information in the relevant parts of this notice applies to children as well as adults.

How Do We Use Cookies and other Tracking Mechanisms?

We use cookies and other tracking mechanisms on our website to collect data about you. We use the data collected from cookies and trackers to analyse trends and statistics. This will help us optimize and customize your website experience and to provide better website functionalities. We collect Personal Data about you via our Mobile Web Application using permissions such as camera, storage, location, etc. Your iOS and Android devices will notify you of the permissions that our Mobile Web Application seeks and will provide you an option to consent to or refuse the permission. We use the data obtained through permissions to enhance the functionality of the App and to analyse it to serve you better.

Data Retention

We collect, share and retain your personal information only for the purpose specified above, including ensuring compliance with applicable laws. Subject to CIMA and other relevant regulatory or law enforcement requirements or other obligations under applicable laws which may prescribe longer periods, we will retain your personal information in an identifiable form until you withdraw your consent.

Data Protection Officer

We have appointed a Data Protection Officer to address any concerns or grievances that you may have regarding the processing of your Personal Information. If you have any such grievances, please write to our Data Protection Officer at dpo@onehealth.ky and Our officer will attempt to resolve your issues in a timely manner.

Notification of Changes

We reserve the right to amend, modify, vary, or update this Privacy Notice, at our sole discretion from time to time, as and when the need arises. The most recently published Privacy Notice shall prevail over any of its previous versions. You are encouraged to check this Privacy Notice from time to time to stay informed of any changes.

Disclaimer

By submitting personal data to us, you acknowledge that:

- a. You have read and understood this Privacy Notice and agree and consent to the use, processing and transfer of personal data as set out herein; and
- b. All information and representation provided are true and correct to the best of your knowledge, and you have not knowingly omitted any relevant information which may have an adverse effect.