



AXA - Global Healthcare Data Privacy Notice

This Data Privacy Notice tells you what data we collect, why we collect it and what we do with it. You can also find information about your rights over your personal information.

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AXA Global Healthcare (AGH) includes AXA Global Healthcare (UK) Ltd, AXA Global Healthcare (EU)Limited, AXA Global Healthcare (Hong Kong) Limited and AXA Life and Health Reinsurance Solutions Limited (ALHRS) (collectively, “**AXA Global Healthcare**”). We are all committed to ensuring your privacy and personal information is protected.

If you were referred to this Privacy Policy from a different AXA Global Healthcare website, or document (for example, your insurance policy handbook) the website or document will set out the details of the AGH company and/or insurer that is processing your personal information. Your policy document will also confirm who the ‘data controller’ of your personal information is.

References to “**we**” or “**us**” shall refer to AXA Global Healthcare. For the purposes of this Data Privacy Notice, subject to the exception set out below, AXA Global Healthcare is the data controller of your personal information. The insurer (the company who has underwritten your policy) will have their own separate Privacy Notice and/or Policies. These can be reviewed [here](#) under the "For existing members" section.

Where you have provided information to us about a third party who has consented to you doing so on their behalf (such as a named party on your policy), please ensure you provide them with this Data Privacy Notice and encourage them to read it as it describes how we collect, use, share and secure personal information.

By providing your personal information to us or on behalf of another party, you acknowledge that we may use it in the ways set out in this Data Privacy Notice. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time, we may need to make changes to this Data Privacy Notice, for example, as a result of government regulation, new technologies or other developments in data protection laws or privacy generally. You should check the AXA Global Healthcare website periodically to view the most up to date Data Privacy Notice.

Exception

If your policy is underwritten by AXA Insurance dac, AXA Global Healthcare (UK) Limited is a data processor and AXA Insurance dac is a data controller for the purpose of administering your insurance contract and complying with data protection laws. You can find AXA Insurance dac’s data privacy statement via the “For existing members” link provided above.



1. Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below, keep it safe and will never sell it.

1. Personal information you provide is processed fairly, lawfully and in a transparent manner
2. Personal information you provide is not processed in a way which is incompatible with the purpose for which we collected it
3. The personal information we request is adequate, relevant and limited to what is necessary for the purposes for which it is processed
4. Your personal information is kept accurate and where necessary kept up to date
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed
6. We will take appropriate steps to keep your personal information secure
7. Your personal information is processed in accordance with your rights
8. We will only transfer your personal information to another country or an international organisation where we have taken steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards and performing appropriate risk assessments of those transfers
9. AXA Global Healthcare companies do not sell your personal information and will ensure that third parties cannot use it for any purposes outside of what a data subject could reasonably expect.
10. We endeavour to be transparent and clear with the way we use your personal information

2. How do we collect your personal information?

While there are several ways in which we collect your personal information, the two main ways we might collect personal information about you are from things you tell us yourself and from things we ask other people or organisations to share with us. Things you tell us could include conversations we have on the phone, what you've written on an application form or if you post something on one of our websites. We might also collect information about you from other people and organisations, such as medical professionals. Please see below for a list of some of the ways we may collect your personal information:

We may collect personal information directly from you:

- via the AXA Global Healthcare App;
- via enquiry, registration forms and claim forms, live chat and virtual assistant platforms;
- via feedback forms and forums;
- when you purchase any of our products or services;
- when you fill out a survey or vote in a poll on our website;
- through quotes and application forms;



- via cookies. You can find out more about this in our cookies policy <https://www.axaglobalhealthcare.com/en/about-us/cookie-policy/> /;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline; and
- when you provide a service to us or our customers (as a supplier).

We may also collect your personal information indirectly from different sources, including:

- from an individual who has a policy with us under which you are insured, for example if you are a named dependant on your spouse's health insurance policy;
- where you are a member of a group or company arrangement, from the sponsor of the arrangement (e.g. your employer or your employer's service provider);
- from websites where you may leave reviews about us, e.g. Trustpilot;
- from social media or via a third party which collates public opinion about AXA from social media;
- your family members, where when they make enquiries about purchasing a product for you or including you on their insurance, when you ask them to make a claim on your behalf, or where you may be incapacitated or otherwise unable to provide information yourself when we need it;
- other AXA Group companies;
- your Insurance Broker if you have one;
- partners who provide our policies directly to you;
- aggregators (such as price comparison websites);
- medical professionals and hospitals;
- third party network providers;
- third parties who assist us with claims management (e.g. checking that claims are eligible for payment);
- third parties who assist us in investigating fraud;
- third parties such as companies who provide consumer classification for marketing purposes e.g. market segmentation and lifestyle data;
- Social media platforms;
- Cookie vendors; and
- Targeted marketing platforms.

3. What personal information do we collect?

We might collect personal information such as your contact details or information about your bank or credit cards. The information we collect depends on which product or service you're interested in. For medical insurance we may ask you about you or your families' medical history. Please note, in certain circumstances we may request and/or receive "sensitive" personal information about you. For example, we may need access to health records for the purposes of providing you with a policy or processing claims.

The information that we collect will depend on our relationship with you. If we need information about other people named on your policy, we may ask you to provide the information below in relation to those people too, if this is relevant to your insurance. For completeness, when we refer to "sensitive personal information", we include both Special



Category Personal Data and Criminal Conviction Data.

Where AXA Global Healthcare is the data controller, we may collect the following information about you.

- Personal information:
 - contact details such as name, email address, postal address and telephone number, including any telephone number collected by our system when you call us;
 - nationality and/or home country and intended country of residence;
 - the relationship of you to other people associated with you in our records, for example, partner, parent, child and the gender you identify as;
 - details of any other persons included on your policy and the relationship to you as policyholder;
 - your occupation;
 - identification information such as your date of birth, national insurance number, passport and driving licence;
 - financial information such as bank details, credit card details;
 - where applicable, details of any vulnerabilities in customers' personal circumstances identified and the support offered;
 - employment details such as name of any employer and work location;
 - information obtained through our use of cookies. You can find out more about this in our [Cookie Policy](#);
 - details of any financial sanction that may apply to you
 - information relevant to your claim
 - your marketing preferences;
 - a record of any consent provided by you; and
 - information collected from your device(s) including IP address, device information (e.g. device type, operating system) and browser.

- Sensitive personal information:
 - details of your current or former physical or mental health;
 - details concerning sexual life or sexual orientation, for example marital status; and
 - details regarding criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions, bankruptcies and other financial sanctions).

- Children's personal and sensitive information
 - We do not collect and record personal and sensitive information about children (individuals under the age of 13) without the consent of the child's parent/ guardian.

For additional personal and sensitive data collected under services provided via our AXA Global Healthcare App, please see the AXA Global Healthcare App [Privacy Notice](#).



4. How do we use your personal information?

We use your personal information to provide you with an insurance policy or benefits; to administer your healthcare trust benefits and other services that you, your employer, or other family members obtain from us. For example, if you have a problem, we make sure the right network of providers and specialists are in place and we can also update you quickly on the progress and cost of your claim and keep you safe from fraud. However, there are several other reasons why we may need to use your personal information; please see below for more details.

When the personal information we process about you is classed as sensitive personal information (criminal offences information and 'Special Category Personal Data' such as your health, sexual orientation and ethnic origin), we must have an additional legal ground for such processing. The legal grounds we rely on for our processing are also set out in more detail at section 5 below.

Administering your Insurance or Trust Benefits

We may process personal and sensitive personal information that is necessary for us to provide your insurance policy, benefits or other services, such as;

- providing a quote;
- assessing your application for cover and setting you up as a policyholder, or trust beneficiary;
- administering and managing your insurance policy or benefits and providing all related services;
- assessing your eligibility for and the handling and paying of claims, (not applicable if your policy is underwritten by AXA Insurance dac); and
- communicating with you regarding your policy.

We use the personal information that you and others provide to us about you your family, where you live, your policy claims history and other non-personal information such as hospital costs to determine your premium and eligibility. The price also depends on what options you have chosen to purchase. We also use information about how long you have been a customer, how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

Information Management

We may use your personal information to help us understand our business and monitor our performance, for example, to help determine how much insurance premiums should be.

If you are a member of a group scheme, we may use your personal information to provide reports to your employer or a parent company on the performance of the scheme and on the



health of the workforce.

The information we provide typically does not allow your employer to identify any individual employee as it is anonymised. However, we may on occasion provide your employer with information that compares total claims paid out on the scheme with the premium paid. This is to help companies get the best value quotes at renewal. For small groups this may cause an employer to infer that a claims cost was due to a particular person.

We use cloud technology storage solutions to store information within the United Kingdom and Europe. These solutions are chosen to ensure efficiency and improved information management performance.

Sometimes we also use services which collate views about AXA shared within social media platforms to obtain a better understanding of opinions about our products and services shared publicly.

Research and Analytics

We may use your personal information for research and analysis including general research into health-related areas and research about the products and services we provide. This allows us to tailor and improve our products and services to better suit the needs of our customers, as well as improving the training we provide internally. Where applicable, we will take steps to anonymise or pseudonymise your data. We will ensure appropriate controls and governance are in place to protect your information.

Fraud Prevention and Detection

To help keep premiums and costs down we work with other insurers, healthcare providers, anti-fraud bodies and law enforcement agencies to protect ourselves, the local healthcare providers and our policyholders from fraudulent behaviour and medical malpractice. We also monitor the services you are being provided by healthcare providers

This may mean disclosing personal information, including health information, to these bodies. In some cases, we provide your personal information to insurance fraud databases, such as the Health Insurance Counter Fraud Group database. We may use information provided by these organisations as well as publicly available information on social media and other sources (including third parties who assist with identity verification and work with Credit Reference Agencies) to help us combat fraud. For example, we use automated anti-fraud filters that check against lists of people known to have undertaken fraudulent transactions. We also have access to tools for detecting fraud, waste and abuse (FWA).

In some cases, we are required by law to report crime and suspected crime and other matters to law enforcement and government agencies. We are also obliged to report suspicions of medical malpractice to a relevant regulatory body such as, in the UK, the



General Medical Council.

If false or inaccurate information is provided to us and fraud is suspected, details may be passed to fraud prevention agencies. We will also periodically search records held by fraud prevention agencies to:

- help make decisions on insurance policies and claims for you and your dependants;
- check your identity to prevent money laundering;
- carry out electoral roll searches and further fraud searches.

Marketing

We would like to keep you informed from time to time about relevant products and services. Depending on your preferences, we may do this by mail, email, telephone or other electronic methods such as text message.

We may occasionally run specific marketing campaigns through social media and digital advertising which are based on general demographics and interests. If you do not want to see any campaigns, then you will need to adjust your preferences within social media settings and your cookie browser settings.

We are committed to only sending you marketing communications that you are interested in receiving. To help us understand the specific products and services that may interest you we sometimes rely on information obtained from third parties inside and outside the AXA Group, including information from cookie vendors (for more information, please see our [Cookie Policy](#)) and targeted marketing platforms.

You are in control of how we use your information for marketing. If you wish to unsubscribe from our marketing communications, you may do so at any time by clicking on the "unsubscribe" link that appears in all emails. Otherwise, you can always contact us to withdraw your consent or update your preferences by using the details provided to in our marketing communications or your policy handbook. If you are a customer, we may need to continue to send you service related (non-marketing) communications.

If you begin the process of obtaining a quote on our website, we may retain certain information provided to us even if you did not complete your quote. Where you consent, we may use this information to enquire as to why you did not complete your quote and better understand your needs.

AI Systems

Artificial Intelligence (AI) is an umbrella term for a range of technologies that replace manual processes and solve complex tasks by carrying out functions that previously required human action. Tasks that we have traditionally done by thinking and reasoning are increasingly being done by, or with the help of, AI.

We use AI to support our existing activities, including our claims management. For example, we use AI to automatically translate some medical invoices and index relevant



documents under your customer records. This allows us to manage claims more efficiently compared to doing these processes manually.

5. Legal grounds we rely on for the use of your personal information

We will only process your personal information where we have a legally valid reason to do so. This is called a legal basis, and more than one legal basis will often apply depending on the processing activity. The table below summarises the legal bases we rely on for each use of your personal information.

How we use your information	Personal information we may process:	Legal grounds for Processing
<p>To review your insurance application and/or provide you with cover.</p>	<p>Your contact and identifying details.</p> <p>Employment details.</p> <p>Your location.</p> <p>Other information relevant to your benefits such as travel plans, destinations, planned activities, dates of travel.</p> <p>Your age, gender and information about your lifestyle (e.g. whether you smoke).</p> <p>Sensitive personal information about your physical or mental health or condition.</p> <p>.</p>	<p>Legal ground for processing of personal information:</p> <p>Performance of a contract: the processing of this personal information is necessary to begin providing health insurance services to you; or</p> <p>Consent: you or someone on your behalf has confirmed your consent.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: such as providing insurance services and the prevention of fraud; or</p> <p>Consent: you or someone on your behalf has confirmed your consent.</p>



<p>To administer, provide and service your insurance policy or your Trust, to verify your no claims discount entitlement, assess eligibility for and handling and paying claims (not applicable if your policy is underwritten by AXA Insurance dac. Please see the AXA Insurance dac Privacy Policy).</p>	<p>Your contact and identifying details.</p> <p>Your employment details.</p> <p>Your location.</p> <p>Your healthcare provider(s).</p> <p>Your financial details such as bank account details</p> <p>Information relating to your claims.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal ground for processing of personal information:</p> <p>Performance of a contract: the processing of this personal information is necessary to provide health insurance services to you; or</p> <p>Consent: you or someone on your behalf has confirmed your consent.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: such as providing insurance services and the prevention of fraud; or</p> <p>Consent: you or someone on your behalf has confirmed your consent.</p>
<p>To communicate with you and resolve any complaints you may have.</p>	<p>Your contact and identifying details.</p> <p>Your location.</p> <p>Your financial details</p> <p>Other information relevant to your benefits such as travel plans, destinations, planned activities, dates of travel.</p> <p>Information relating to your claims.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal grounds for processing of personal information:</p> <p>Performance of a contract: the processing of this personal information is necessary to provide health insurance services to you; or</p> <p>Consent: You or someone on your behalf has confirmed your consent; or</p> <p>Legal obligation: we may need to process personal data to comply with our statutory obligations relating to your complaint; or</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: such as providing</p>



		<p>insurance services and the prevention of fraud; or</p> <p>Consent: you or someone on your behalf has confirmed your consent; or</p> <p>Establishment, exercise or defence of legal claims: to protect our legal rights.</p>
<p>For our own information management purposes, including managing our accounting records, analysis of financial results, internal audit requirements and receiving professional advice.</p>	<p>Your contact and identifying details.</p> <p>Financial details.</p> <p>Employment details.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal ground for processing of personal information:</p> <p>Consent: you or someone on your behalf has confirmed your consent; or</p> <p>Legitimate interest: we have a legitimate business need to use your personal information to understand our business and monitor performance and maintain appropriate records; or</p> <p>Legal obligation: we may need to process your information to comply with certain legal obligations with regard to the security and operation of our systems and maintenance of accounting records; or</p> <p>Performance of a contract: properly managing your information is necessary in order to provide health insurance services to you.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: such as providing insurance services and the prevention of fraud; or</p> <p>Consent: you or someone on</p>



		your behalf has confirmed your consent; or
For research and analytical purposes, to enhance our service quality, training and information security (for example, using recorded phone calls made to our contact numbers to train customer service agents).	<p>Your contact and identifying details.</p> <p>Your financial details,</p> <p>Information relating to your claims.</p> <p>Information shared during your interactions with us, e.g. information shared over the phone.</p>	<p>Legal ground for processing of personal information:</p> <p>Consent: you or someone on your behalf has confirmed your consent; or</p> <p>Legitimate interest: we have a legitimate business need to use your personal information to enhance our service, training and information security.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: such as providing insurance services and the prevention of fraud.</p>
To prevent, detect and investigate fraud	<p>Your contact and identifying details.</p> <p>Your location.</p> <p>Your employment details.</p> <p>Your financial details</p> <p>Other information relevant to your benefits such as travel plans, destinations, planned activities, dates of travel.</p> <p>Information relating to your claims.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal ground for processing of personal information:</p> <p>Legal obligation: We have a legal obligation to prevent, detect and investigate fraud.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: there is a substantial public interest in the prevention, detection and investigation of fraud.</p>



<p>For the purposes of debt recovery, for example we may need to process information for this purpose if you have not paid for your insurance policy.</p>	<p>Your contact and identifying details.</p> <p>Your location.</p> <p>Your financial details.</p> <p>Information relating to your claims.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal ground for processing of personal information:</p> <p>Legitimate interest: we have a legitimate business need to recover any debt.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Establishment, defence or exercise of legal rights : such use is necessary for the purposes of establishing, exercising or defending our legal rights.</p>
<p>Complying with our legal or regulatory obligations</p>	<p>Your contact and identifying details.</p> <p>Your location.</p> <p>Your financial details.</p> <p>Information relating to your claims.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal ground for processing of personal information:</p> <p>Legal obligation: Where applicable, we may process your information to comply with a legal or regulatory obligation.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: there is a substantial public interest in ensuring we comply with our legal and regulatory obligations when processing your data.</p>
<p>Communicating marketing information to you via post, phone, email, text message or social media and developing and tailoring our marketing activities</p>	<p>Your contact and identifying details.</p> <p>Your marketing preferences.</p> <p>Your behaviour and usage data.</p>	<p>Legal ground for processing of personal information:</p> <p>Consent: you or someone on your behalf has confirmed your consent; or</p> <p>Legitimate interest: We have a legitimate business need to tailor advertising to and market to customers and prospective customers who show an interest in us.</p>



<p>To protect and secure our business operations, systems and services</p>	<p>Your contact and identifying details.</p> <p>Your financial details.</p> <p>Information relating to your claims.</p> <p>Your behaviour and usage data.</p> <p>Sensitive personal information about your physical or mental health or condition.</p>	<p>Legal ground for processing of personal information:</p> <p>Legitimate interest: we have a legitimate business need to protect and secure our business operations, systems and services.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: there is a substantial public interest in ensuring we are able to protect and secure our business operations, systems and services to ensure your health information is protected.</p>
<p>To develop artificial intelligence (AI) models and systems, which once developed may be used for the purposes set out in our privacy policy and privacy notices. For example, the use of AI models to support fraud detection or claims processing</p>	<p>This varies depending on the purpose of the model being developed; but may include any of the data already listed in the table above.</p>	<p>Legal ground for processing of personal information:</p> <p>Legitimate interest: we have a legitimate business need to protect and secure our business operations, systems and services.</p> <p>Additional legal ground for processing of sensitive personal information</p> <p>Substantial public interest purposes: there is a substantial public interest in ensuring we are able to protect and secure our business operations, systems and services to ensure your health information is protected.</p>



6. Who do we share your personal information with?

We might share your personal information with two types of organisation – companies inside the AXA Group, and other third parties. For further details of all disclosures, please see below. We will not share any of your personal information other than for the purposes described in this Data Privacy Notice. If we share anything outside the AXA Group, it will be kept strictly confidential and will only be shared for reasons that we have agreed with you in advance.

Disclosures within the AXA Group

In order to provide our services, your personal information is shared with other companies within the AXA Group including, but not limited to AXA Insurance dac, AXA PPP healthcare Limited (AXA Health), AXA Assistance, AXA Global Business Services and AXA Health Services Limited, AXA XL Insurance Company UK Limited. In addition, your personal information might be shared for our general business administration purposes.



Disclosures to third parties

We may also disclose your information to the third parties listed below for the purposes described in this Data Privacy Notice. If you are a member of a Trust scheme we will always gain your consent before discussing your health information with a third party.

Our third parties include:

- Your doctor or hospital, or other medical, social and welfare advisers, or practitioners;
- Your relatives, guardians or someone else acting on your behalf where you are incapacitated or unable, or other people or organisations connected to you such as your insurance broker, your patient (if you are a healthcare practitioner) or your lawyer
- Your current, past or prospective employers if you have been part of a group or company scheme;
- Appointed third-party hospital network providers, administrators or service providers that we use to assist in confirming eligibility, management and settlement of claims;
- Our insurance partners such as brokers, insurers, reinsurers or other companies who act as insurance distributors;
- Other insurers, if you are transferring from one insurer to another;
- Our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and contractors and their sub-contractors;
- Our suppliers and providers of goods or services that we make available to you;
- Financial organisations and advisers;
- Central and local Government (for example if they are investigating fraud or because we need to contact them regarding international sanctions);
- Law enforcement or regulatory authorities such as, in the UK, the Financial Conduct Authority or the Information Commissioner's Office, in Ireland, such as the Central Bank of Ireland or the Data Protection Commission, and in Hong Kong, such as the Office of the Privacy Commissioner for Personal Data (PCPD);
- Complaint arbitration services such as, in the UK, the Financial Services Ombudsman;
- Other insurance companies, healthcare provider fraud teams, the UK General Medical Council, the police or other law enforcement agencies and organisations that maintain anti-fraud or other crime databases where reasonably necessary for the prevention or detection of crime;
- Selected third parties in connection with the sale, transfer or disposal of any part of our business; and
- Selected cookie vendors and marketing platforms in connection with our targeted marketing activities and market analysis.

Disclosure of your personal information to a third party outside of the AXA Group (with the exception of certain requests from law enforcement or regulatory bodies) will only occur where the third party has agreed to keep your information strictly confidential and where it may only be used for the specific purpose for which we provide it to them.



7. Data transfer and access across borders

The collection of information and its processing prior to transfer are subject to the national laws where it is collected and/or where the data subject is located, and conditions for or restrictions on its transfer according to those laws are respected by AXA Global Healthcare.

We provide medical insurance and claims management services on a global scale. As a result, customer data can be accessed in various national jurisdictions to service your policy or process a claim. We ensure that the organisations and individuals with access to the data comply with strict security standards and are subject to contractual obligations regarding non-disclosure and data protection. Such steps may include placing the party gaining access to the information under contractual obligations to protect it to appropriate standards (such as by putting Standard Contractual Clauses in place).

8. How long do we keep records for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Data Privacy Notice and to comply with our legal and regulatory obligations. The period varies depending on the nature of the personal information and what we do with it, as well as our regulatory obligations. We typically keep quote information for up to 3 years, and policy and claims records for up to 7 years from the end of our relationship with you. In some cases, such as if there is a dispute or a legal action, we may be required to keep personal information for longer.

9. Your rights

You have various rights with regards to your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even ask us to delete it. We'll either do what you've asked or explain why we can't – usually because of a legal or regulatory issue.

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you in a secure electronic format, unless otherwise requested.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete however, if you believe that any of the personal information we hold is incorrect, please let us know so that we can update or amend it.



The right to erasure

In certain circumstances you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example there may be legal and regulatory obligations which mean we cannot comply with your request. Please note that if we erase your personal data, we may not be able to process your insurance policy or administer your Trust claims. This may result in the cancellation of your policy where our ability to administer your claim appropriately has been prejudiced by erasure of your personal information.

Right to restriction of processing

You are entitled to ask us to stop using your personal information. If you request that we restrict processing of your personal data we may not be able to process your insurance policy or administer your Trust claim. This may result in the cancellation of your policy where our ability to administer your claim appropriately has been prejudiced by erasure of your personal information.

Right to data portability

Where you have purchased your policy online, you have the right to ask that we transfer any personal information that you have provided to us as part of that process to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

Right to object to direct marketing

You can ask us to stop sending you marketing messages at any time. Please see section 4 for more information.

Right not to be subject to automated decision-making

You have the right not to be subject to decisions that are made automatically by inputting your personal information into a system or computer rather than made by our employees.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this you have the right to withdraw your consent to further use of your personal information. You can do this by contacting us via the details provided in the section below. Please note in some cases we may not be able to process your insurance claim or your Trustclaim if you withdraw your consent.

The right to lodge a complaint

You have a right to complain to the Information Commissioners Office in the UK, the Data Protection Commission in Ireland, or the relevant Data Protection government body in the country you reside at any time if you object to the way in which we use your personal information. More information can be found on the UK Information Commissioner's Office



website: <https://ico.org.uk>, or the Irish Data Protection Commissioner's website:
<https://forms.dataprotection.ie/report-a-breach-of-personal-data>.

You can make any of the requests set out above using the contact details provided below. These details are also in your policy handbook. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. We will always respond to any request you make and if we can't comply with your request we will tell you why.

10. Contact details of the Data Protection Officer

If you wish to contact the Data Protection Officer, the details are below:

The Data Protection Officer:

AXA Global Healthcare
International House,
Forest Road
Tunbridge Wells
TN2 5FE
England

Email address: aghprivacy@axa.com