

	<p>What Athena does with the Personal Data provided to us</p>
<p>Personal Data</p> <p>The types of personal data we may process depends on the products or services we may provide you</p>	<p>Basic Personal Data such as:</p> <ul style="list-style-type: none"> a) Personal information: last name, middle name, first name, date of birth, gender, nationality, employment details b) Identification information: identity card and/or personal identification number/s, passport number, driver's license, license plate, personal tax, social or insurance card number/s, images/photographs c) Contact information: mailing address, home address, telephone number, email, d) Family information: marital status, family relationships, dependents e) Digital information: information collected automatically when using our websites and/or mobile applications such as IP information, cookies, logins f) Communication information: phone call recordings to our hotlines, customer service lines, complaints, surveys, experiences, your communication preferences, and related information. <p>Sensitive Personal Data such as:</p> <ul style="list-style-type: none"> a) Financial & Transaction information: bank account, credit card, debit card, credit bureau records, payment/transaction records, b) Insurance & Private information: claim history, medical and health records/diagnosis, police/law enforcement and/or court decisions/reports/investigations, genetic/pre or hereditary conditions, race/ethnicity, sexual orientation
<p>Purpose</p> <p>The reasons we may process Personal Data depends on the products or services we may provide you</p>	<p>The Personal Data is primarily to assist in serving your interests and assists us to operate efficiently so we can continue to best serve your interests. Hence, we may process your Personal Data for the below "Purposes":</p> <ul style="list-style-type: none"> a) To perform our obligations and maintain high level of services to you by: <ul style="list-style-type: none"> Processing and determining insurance applications, claims; providing ongoing insurance services such as administering policies issued, conducting identity, credit, debt, medical, health checks; communicating with you Processing requests for payment such as direct debit authorizations, automated credit card payments; evaluating your financial needs; accounting purposes managing, investigating, analyzing disputes, actions and/or legal proceedings; exercise our rights defined in applicable policy wordings such as subrogation rights b) To comply with applicable laws, regulations & maintain our standards by: <ul style="list-style-type: none"> Meeting disclosure requirements of the laws of Vietnam or any foreign law, regulations, codes, or guidelines binding on Athena, its parent, and affiliated companies assisting police/law enforcement, other government/regulatory authorities in Vietnam or other applicable jurisdictions complying with legitimate requests/orders of the People's Courts of Vietnam, Insurance Supervisor Agency under Ministry of Finance of Vietnam, auditors, governmental bodies, related establishments Conducting matters related to our operations, corporate strategy, transactions (ie. joint ventures, acquisitions, sales) managing IT security, environment and related matters including security of our operations, systems, data preventing, detecting and investigating illegal activities, such as fraud, bribery, money laundering, terrorism financing. Complying with legal, regulatory, fiscal, and other good governance obligations, including respond to requests/audits from public, government authorities in Vietnam and/or overseas

	<p>Monitoring, maintaining compliance with our, Athena, policies, and standards; establishing, exercising, or defending our legal rights.</p> <p>c) To continuously improve our products/services for you:</p> <p>Achieving other legitimate business purposes such as carrying out insurance surveys, statistics, research, analysis; analyzing our customer base, other individuals for behavior, preferences, interests; developing new products or recommendations; targeting, understanding your specific interests or needs; improving our services to you; identifying usage trends.</p> <p>Offering, providing, marketing certain products/services of ours, Athena or our business partners (see “Direct Marketing” below) facilitating our partners, authorized service providers, intermediaries to provide services to us and/or you for above purposes, other purposes directly relating to any of the above purposes; and other purposes we notify you at time of obtaining your consent.</p>
<p>Methods</p> <p>How we collect or obtain Personal Data depends on the products or services we may provide you</p>	<p>We only process Personal Data i) when you provide us voluntary express consent, ii) to protect life/health of data subjects or others in emergencies, iii) per applicable laws or iv) fulfill obligations under contracts with data subjects.</p> <p>As such, we may collect Personal Data through our websites, mobile applications, when you communicate with us, submit applications, claims, complaints, make requests, purchases, payments, subscribe, follow our social media or create customer accounts. Additionally, we may obtain Personal Data from one of our, business partners, service providers, insurance intermediaries, your representatives, employers, or other related third parties such as but not limited to police, hospitals, regulators, government, or public authorities.</p> <p>Your consent may be withdrawn at any time (see “Your Rights” below). Withdrawal of your consent does not affect the lawfulness of our Personal Data processing prior to your withdrawal. Please note, if you refuse i) to provide us all or some of your Personal Data, ii) whom we may obtain or provide Personal Data, iii) to process Personal Data for all or some of the Purposes, or, iv) for if you provide us incomplete or inaccurate information, it may have undesirable consequences for you such as we may not be able to provide you all or some of our products/services, or at standards we promised or which you may have requested, including meeting obligations under the insurance contract.</p>
<p>Retention & Security</p>	<p>We have reasonable policies and procedures in place to protect Personal Data provided to us and take all practicable steps to ensure the security of the Personal Data, to avoid unauthorised, accidental access, erasure, misuse, alternation, destruction, or other undesirable consequences. Despite our best efforts, protection cannot be absolutely guaranteed against all threats. To the best of our ability, access is limited to those Recipients stated above for any of the above Purposes and those who have access to Personal Data are required to uphold confidentiality and adhere to standards as dictated in this Privacy Notice.</p> <p>We also make best efforts to retain Personal Data only for so long as necessary for any of the above Purposes or until we are asked by you for your Personal Data to be deleted (see “Your Rights & Obligations” below).</p>

<p>Recipients</p> <p>Who we provide Personal Data depends on the products or services we may provide you</p>	<p>Subject to applicable laws, we may provide Personal Data to others for one or more of the above Purposes. Your Personal Data may be available to:</p> <p>Athena: our affiliates; employees/contractors associated with us; reinsurers; claims investigation companies; intermediaries; industry associations; companies that consolidate claims and underwriting information for insurance industry; fraud prevention companies; insurers (whether directly or through fraud prevention or others named herein); databases or registries (and operators) used by insurance industry; claims/loss adjusters; others carrying on insurance or reinsurance related business</p> <p>Service Providers: agents; consultants; sub-contractors; banks; third parties providing administrative, telecommunications, computer, payment, banking, financial or other services in connection with our operations and/or business; accountants; auditors; legal and other advisors; call-centers; research and analytics providers; other third-party providers assisting in related activities</p> <p>Others: healthcare professionals; hospitals; investigators; medical and rehabilitation clinics; police; court; emergency assistance companies; medical panels; surveyors, specialists; repairers; credit agencies; debt collection agencies; those with legitimate interests in your policies, subject matter of your policies, and/or products/services you have with us; those in event of reorganizations, mergers, sales, joint ventures, assignments, transfers or dispositions of all or any portion of our businesses, assets or stock (including in connection with any bankruptcy or similar proceedings); marketing providers (if consent is provided); your representatives or those whom you provided consent</p> <p>By Law: persons/entities we are obligated to make disclosure under applicable laws or for purposes related to any regulations, codes or guidelines issued by government, regulator, or other authorities which Athena are expected to comply or per court orders</p> <p>IT Security & Storage: data centers, servers of ours and Athena where we would be controller of processing Personal Data. Subject to applicable laws, such data centers/servers may be in Vietnam, or such other countries as determined by Athena from time to time; IT systems, management, support, security providers; data processors; cloud providers; companies maintaining, reviewing, developing our systems, procedures, and infrastructure including testing or upgrading our computer networks, security, software, data protection</p>
<p>Direct Marketing</p>	<p>We may use your Personal Data for direct marketing purposes such as sending you, from time to time, by post and/or electronically: latest and/or seasonal promotions, offers and/or discounts</p> <p>renewal and/or new offers, updates, newsletters, or related communications marketing campaigns, personalized ads and/or related communications that we consider may be of your interests related to your current insurance policy or certain products/services that may be offered by us.</p> <p>We only send you marketing materials as described above upon your prior voluntary express consent. You may, at any time, withdraw your consent to the processing of your Personal Data for direct marketing by clicking the unsubscribe link (if any) in such materials or by contacting us in person, post, via email and/or call.</p>

Minors	<p>Persons under the age of 16 (“Minors”) shall not transmit Personal Data to us without consent of their parents/guardians. We do not knowingly solicit or collect Personal Data from Minors.</p> <p>There are situations where collection is outside of our control, for example, filling in online applications which Minor might access without adult supervision, control, or accompaniment. Under such circumstances, we do ask if such Minor provided its own consent and its parents/guardian’s consent for processing the Minor’s Personal Data.</p>
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