

Privacy Notice and Personal Data Use



1 LEGAL NOTICE

Best Doctors Insurance Limited ("BDIL"), and each of its affiliates, subsidiaries and providers (collectively "Best Doctors"), require that every client, member and visitor (the "User") to the BestDoctorsInsurance.com website, any subdomain of the same, or other websites operated by or for Best Doctors, as well as its electronic Portals (collectively, the "Sites") be aware of the terms and conditions in this Privacy Notice (the "Notice") regarding the use of clients', members' and Users' Personal Data.

By accessing and using the Sites, the User is subject to these terms and conditions and agrees to abide by them.

This Privacy Notice applies to any person who voluntarily provides Personal Data for the purposes described in this Notice and concerning the products and related services offered by Best Doctors.

2 TERMINOLOGY

For all practical and legal purposes, the User is advised that in the Sites, the term "Best Doctors" refers to the company that offers health insurance policies or administers health insurance coverage, as well as its providers, under the terms and privacy conditions described in this Notice, in compliance with Best Doctors Privacy Policy and with all applicable regulations.

3 HEALTH INSURANCE SERVICES

The benefits and coverage referred to on Best Doctors' documents and in the Sites are subject to each insurance policy's terms, conditions, and restrictions, as established in the contract between Best Doctors, or any other applicable insurance company, and the User.

4 PERSONAL DATA

Personal Data is any information that can identify a person, directly or indirectly, and that refers to their medical or health condition, financial position, employment status or national origin and marital status. For example, names, email addresses, identification cards, bank and financial information, health status and medical records, and sensible such as biometric, and genetic data, among others.

5 USE OF PERSONAL DATA

Best Doctors confirms that its collection and treatment of Personal Data is carried out in compliance with privacy and security standards and guarantees the legally recognized rights of its holders in compliance with applicable statutes and regulations, including Bermuda's Personal Information Protection Act 2016 ("PIPA").

For purposes of this Notice and regarding any insurance policy issued by BDIL, the term "Personal Data" and "Sensitive Personal Data" shall be identical to the definitions of Personal Information and Sensitive Personal Information in PIPA.

Best Doctors collects and handles the Personal Data of its clients, members, and Users only for the purposes described in this Notice and in a way that is

adequate, relevant and not excessive in relation to such purposes.

The treatment, use, or transfer of personal data, including sensitive data, is done legally and responsibly, safeguarding the right of consent, responsibility, and purpose for which the data was collected, in compliance with applicable laws and regulations, including Bermuda PIPA.

Best Doctors shall not use Sensitive Personal Data relating to an individual's place of origin, race, color, national or ethnic origin, sex, sexual orientation, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political beliefs or opinions, trade union membership, biometric information or genetic information to discriminate any person, contrary to Part II of the Bermuda Human Rights Act 1981.

6 LAWFUL BASIS FOR PROCESSING PERSONAL DATA

Access to and use of Best Doctors Sites, plans, services and documents are subject to current legal provisions as described in this Notice.

Likewise, Personal Data collected by Best Doctors through different formats and means, including physical and electronical, will be treated in strict compliance with applicable statutes and regulations, including PIPA.

In addition to this Notice, our User Terms are available at BestDoctorsInsurance.com and in the Portals, where you can find the standards and conditions under which Personal Data is used.

7 PERSONAL DATA COLLECTION

Personal Information, including that of a sensitive nature, provided by our clients, members, and Users through applications, websites, calls, mails and other types of documents, such as questionnaires and contract-related formats, as well as that provided through third parties authorized by Best Doctors, and that generated as a result of the legal relationship with our clients, members and Users, will be treated for the purposes, and in accordance with the conditions, expressed in this Notice.

Type of data that we may collect from our clients, members and Users:

- **Personal Data:** names, addresses, emails, phone numbers, assets, banking and financial information, identification, employment, hobbies, academic, and immigration data; as well as data on legal procedures, lawsuits and/or jurisdictional proceedings, and all kinds of telephone call records that Best Doctors keeps regarding its clients, members, and Users.
- **Sensitive Personal Data:** data related to the health, physical features, lifestyle, sexual orientation, and ideology of our clients and Users.
- **Biometric Data:** data related to physiological characteristics and behaviors that provide unique information on the physiology or health of our clients and Users.

Privacy Notice and Personal Data Use



- **Genetic Data:** data related to inherited or acquired genetic characteristics that provide unique information about our clients' and Users' profiles.

8 PURPOSES FOR USING PERSONAL DATA

The Personal Data will be processed by Best Doctors, directly or indirectly, through its subsidiaries, affiliates, or related companies, through third parties, service providers, or contractors with whom there is a legal relationship, or through those who collect and process Personal Data on behalf of Best Doctors for the purposes Users, members and clients gave their consent per this Notice and that are necessary for the existence, maintenance, and fulfillment of the established legal relationship.

The Personal Data will be processed to evaluate their request for medical coverage and underwriting, to verify and analyze coverage in the event of a covered illness or accident, and, if applicable, for the issuance of the service contract. It will also be used to process claims, to manage, maintain, and renew the insurance policy, to prevent fraud and illegal operations; for statistical purposes, and for any other purposes related to the fulfillment of Best Doctors' obligations, according to the provisions in the insurance policy and the applicable current regulation.

Best Doctors may also collect Personal Data from third parties, through their clients, members, and Users for billing purposes and/or for signing contracts or other instruments.

In addition, Best Doctors may use Personal Data for **secondary purposes** that are not necessary for the existence, maintenance, and fulfillment of the aforementioned legal relationship, but that enables it to provide a better service by:

- Offering and promoting products, and services directly or indirectly by Best Doctors' entities or affiliates.
- Marketing, advertising, and evaluating its products and services, by delivering free promotional items, or gifts.
- Sending event invitations.
- Contacting, by any means, its members to assist them with requests, complaints, and/or claims.
- Conducting surveys, market studies, and/or confirming Personal Data.
- Analyzing internal statistics or sending notices of service improvements.

If Users disagree with the processing of their Personal Data for the purposes described above, they can send an email to ddarrell@iml.bm or mail a written letter to 5201 Blue Lagoon Drive, Suite 300, Miami, Florida 33126 to limit the processing of their personal data. Opting out of the secondary purposes of use of Personal Data is not a reason for Best Doctors to deny products or services offered by the contracted insurance policy.

9 INFORMED AND VOLUNTARY CONSENT

Best Doctors may receive or collect Personal Data

through its Sites, applications, portals, devices, websites, through social media networks, or by any other means or channels, physic or electronic.

In this regard, Users give Best Doctors, its subsidiaries, affiliates, third parties, contractors, and suppliers their voluntary, free, express, specific, informed, and unequivocal consent to collect, handle, use, store and transfer their Personal Data through any of its modalities and means (local or cross-border), directly or indirectly, virtually or physically, for the purposes described in this Notice.

10 USER'S DATA PRIVACY RIGHTS

Best Doctors recognizes and observes the User's rights regarding the privacy of their Personal Data among which are the following:

- Have free access to their provided Personal Data and be informed about the purposes for which such data has been and is being used.
- Request to update and rectify partial, inaccurate, incomplete, or misleading Personal Data.
- File complaints about any situation related to their Personal Data.
- Revoke the authorization to use their Personal Data and/or request its deletion, unless there is a legal or contractual duty that makes it necessary to keep it.
- Refrain from answering questions about sensitive data.
- Request the modification and/or elimination of their Personal Data stored in Best Doctors' databases.
- Exercise the right to the portability of their Personal Data.
- Erase, block and destroy their Personal Data.

In accordance with section 18 of PIPA, Best Doctors may refuse access to Personal Data if disclosure of it would be likely to prejudice the physical or mental health of the User.

11 TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Through this Notice, Best Doctors informs clients and Users that it can transfer their Personal Data to national or overseas third parties, including subsidiaries, affiliates, or related companies and service providers with which Best Doctors maintains a contractual relationship and privacy clauses, for purposes including but not limited to the following:

- To comply with financial or regulatory obligations derived from laws or international agreements related to Best Doctors' activities, noting that such sharing of information is a described purpose under section 9 (1)(b) of PIPA and noting the choices and means the User has to access, rectify, block, erase and destroy Personal Data as set out in this Notice.
- To comply with notifications, requirements, or judicial orders; with sector institutions or entities for fraud prevention and risk selection.

Furthermore, Best Doctors may, subject to the requirements of section 15 of PIPA or any other applicable law or regulation, transfer Users' Personal

Privacy Notice and Personal Data Use



Data, without their consent, in the cases specified below:

- When the transfer is provided for in international law or treaty.
- When the transfer is required for preventive medicine or medical diagnosis, the provision of medical care or treatment, or the management of health services required by public or medical authorities.
- When the transfer is necessary or legally required to safeguard public interest or to seek or administer justice.
- For public interest reasons in the health field, in compliance with data protection and establishing adequate and specific measures to protect the interests and fundamental rights of the client, member, or User.
- If necessary, to protect the vital interests of the clients, members, or Users in case they cannot provide their consent.

12 TOOLS AND PROCEDURES TO REVOKE THE CONSENT OF PERSONAL DATA PROCESSING

At any time, Best Doctors clients, members, and Users can revoke their consent to process their Personal Data. However, it is important to understand that in some cases, it is required to continue using their Personal Data due to legal obligations.

Likewise, the revocation of the consent will imply that Best Doctors cannot continue to provide the contracted service and may need to terminate the relationship with the client, member, or User in the absence of the necessary information for the contractual relationship.

To revoke consent, a Best Doctors client, member, or User must send a message by email to ddarrell@iml.bm or by post to: 5201 Blue Lagoon Drive, Suite 300, Miami, Florida 33126, with their Request for **Revocation of Consent**, accompanied by proof of identity (official identification) or, where appropriate, that of the person who legally represents them.

Also, if the client, member, or User does not want their Personal Data to be transferred to third parties for the purposes described in this Notice, they must withdraw their consent.

13 PERSONAL DATA STORAGE, PRIVACY AND SECURITY

The Personal Data collected by Best Doctors will be incorporated and processed in the Best Doctors Data Bank. Automating this process guarantees the necessary technical, organizational, and security measures for its treatment, including cross-border transfers.

To prevent unauthorized access to the client's, member's, and User's Personal Data Best Doctors has implemented physical, electronic, and administrative procedures that limit its use and disclosure and allow it to handle it properly.

Best Doctors does not retain User's Personal Data for longer than it believes is necessary for any of the purposes set out in this Notice or which is dictated by legal or professional requirements.

Best Doctors will encrypt, erase or destroy, documents containing Personal Data as soon as it is reasonable to assume that the original purpose for which it was collected is no longer being served by the retention of the data or retention is no longer necessary for legal, business or professional purposes. Best Doctors will take reasonable care when destroying data.

Best Doctors has adequate and sufficient technological measures to guarantee the protection of its clients', and Users' Personal Data, which are periodically evaluated. Nevertheless, there is the possibility of involuntary leakage or unauthorized access to said data, in which case Best Doctors will notify the corresponding authorities and its clients, members, and Users without undue delay and take immediate and corrective actions.

14 CONFIDENTIALITY IN USER COMMUNICATIONS

Except for what is established in the applicable legal provisions, Best Doctors will do its best to safeguard the confidentiality of its clients', members', and Users' Personal Data and communications. However, registrations or enrollments made by the client, member or User in any type of discussion board will not be considered confidential.

15 PRIVACY OFFICER, COMMUNICATION CHANNELS AND RESPONSE TIME

Dawnette Darrell is designated as BDIL's Privacy Officer, is responsible for compliance with its Privacy Policy and may be contacted at ddarrell@iml.bm.

Best Doctors will review and respond to all inquiries, requests, or questions related to its clients, members, and Users' Personal Data within a reasonable period not longer than ten (10) working days and following the applicable legal regulations.

16 MODIFICATIONS AND CHANGES TO THE PRIVACY NOTICE

This Notice may be modified or updated by Best Doctors at any time. Modifications or updates will be effective immediately; therefore, we recommend Users check it periodically when visiting the Sites to be aware of any updates.

The insurance policy is issued by Best Doctors Insurance Limited, a company registered in Bermuda. The medical insurance management service is offered by Best Doctors Insurance Services, LLC., representing Best Doctors Insurance Limited. **BestDoctorsInsurance.com**

Collect Call 1.305.269.2521
Toll Free in the USA 1.866.902.7775
Fax 1.800.476.1160