



AXA Global Healthcare PP App Privacy Notice

1	Introduction.....	4
1.	Protecting Your Privacy	4
2	Transparent and Responsible Handling of Your Information.....	5
3	Changes to Our Privacy Practices	5
4	Wellness Modules	6
5	Module-Specific Changes.....	6
5.1	Activity Tracking.....	6
5.2	Nutrition.....	6
5.3	Mindfulness.....	7
5.4	Face Scan	7
5.5	Brain Games.....	7
6	User Responsibility.....	8
7	Information We Collect.....	8
7.1	Personal Information	8
7.2	Device and Usage Information.....	8
8	Information Collected Through AI Features.....	8
8.1	Wellness Module 4: Face Scan - Blood Pressure Monitoring Using Green Light Reflection.....	8
9	Data Handling and Privacy.....	9
10	Health Data Access Permissions	9



10.1	Overview of Health Data Integration	9
10.2	Permissions Required.....	9
10.2.1	Apple HealthKit.....	9
10.2.2	Google's Android Health	9
11	How We Use Health Data.....	10
12	User Consent and Control	10
13	International Data Transfers	10
13.1	Overview of Data Transfers	10
13.2	Entities Involved in Data Processing.....	10
13.3	Safeguarding Your Data	10
13.4	Security Measures.....	11
13.5	Commitment to Data Security	11
13.6	Technical Safeguards	11
13.7	Organisational Measures.....	11
13.8	Physical Security Measures.....	12
13.9	Continuous Improvement.....	12
13.10	Your Role in Securing Your Data.....	12
14	Retention of Your Information	12
14.1	Overview	12
14.2	General Retention Policy.....	12
14.3	Specific Retention Practices for Wellness Modules.....	13
14.3.1	On-Device Data Storage	13
14.3.2	Developer Data Collection	13
14.4	Access and Deletion.....	13
14.4.1	Compliance and Review	14



15	Use of Cookies and Tracking Technologies.....	14
15.1	Introduction.....	14
15.2	What are Cookies and Tracking Technologies?.....	14
15.3	How We Use These Technologies	14
16	Marketing Preferences	15
16.1	Overview	15
16.2	Marketing Communications.....	15
16.3	Types of Marketing Communications.....	15
16.4	Managing Your Marketing Preferences.....	15
17	Your Rights.....	16
17.1	You have the right to:	16
17.2	Changes to Marketing Preferences:.....	16
17.3	Commitment to Your Preferences	16
18	Children’s Privacy	16
18.1	Commitment to Protecting Children's Privacy	16
18.2	Information on Dependents.....	17
18.3	Safeguarding Dependent’s Information.....	17
18.4	Parental Consent and Access.....	17
18.5	Updates and Contact Information.....	17
19	Contact Us.....	18
19.1	Getting in Touch	18
19.2	Contact Details	18
20	Appendix.....	18
20.1	Overview	18
20.2	Definitions of Key Terms	18



21	Legal References and Documents.....	19
21.1	Links to Third-Party Privacy Policies	19
22	Contact Information for Data Protection Authorities	19
23	Glossary of Technical Terms	19

1 Introduction

The AXA Global Healthcare PP App is developed for AXA Global Healthcare group, which 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.

This Privacy Notice explains how we handle and protect the personal information of our users. It is designed to inform you about our practices concerning the collection, use, and sharing of personal information you provide to us using our mobile app, which extends the features of our online portal and includes a unique wellness tab equipped with advanced AI-driven functionalities.

1. Protecting Your Privacy

Your privacy and the security of your personal information are of paramount importance. We are committed to treating your personal information with care and respect. Under the framework of data protection laws, we act as the data controller, meaning we determine how and why your personal data is processed. Where applicable, such as when policies are underwritten by AXA Insurance DAC, AXA Global Healthcare (UK) Limited acts as a data processor, and specific privacy statements relating to those arrangements can be found on our website.

This app-specific privacy notice is designed to provide detailed information about the specific features and data processing activities unique to this app. It is important to read this notice in conjunction with the main privacy notice of AXA, which can be found at <https://www.axaglobalhealthcare.com/en/about-us/privacy-and-legal/>. In the event of any discrepancies between this app-specific notice and the main privacy notice, the main privacy notice should be considered the authoritative source of information.



2 Transparent and Responsible Handling of Your Information

Our handling of your personal information is guided by the following principles:

- **Fairness and Lawfulness:** We process your personal information fairly and lawfully.
- **Purpose Limitation:** We collect personal information for specific, explicit, and legitimate purposes and do not process it in a way that is incompatible with those purposes.
- **Data Minimization:** We ensure that personal information is adequate, relevant, and limited to what is necessary.
- **Accuracy:** We keep personal information accurate and up to date.
- **Security:** We implement strong measures to protect your personal information from unauthorized access, alteration, or destruction.
- **Rights Protection:** We process your personal information in ways that protect your rights.

3 Changes to Our Privacy Practices

This Privacy Notice may be updated periodically to reflect changes in our personal information practices or relevant laws and will be uploaded to <https://www.axaglobalhealthcare.com/en/about-us/privacy-and-legal/>. We will indicate at the top of the notice when it was most recently updated. We encourage you to review our Privacy Notice periodically to stay informed about how we are protecting your information. Our most up-to-date privacy notices will also be linked to from the Apple App Store and Google Play Store listing pages.

By using the AXA Global Healthcare PP App, you acknowledge that you have read and understood this Privacy Notice and the collection and use of your personal information as outlined herein. We also recommend sharing this information with other individuals whose personal information you may provide through our services. The app is not intended for use by children under the age of 16.



4 Wellness Modules

We are committed to ensuring transparency and maintaining your trust by keeping you informed about how we handle your personal data. Our app includes five wellness modules, each provided by a different third-party vendor with its own set of privacy practices and terms and conditions. AXA Global Healthcare group does not collect personal data shared or processed by the Wellness modules.

Here's how we manage and communicate changes to our Privacy Notice and those of each module:

5 Module-Specific Changes

Each wellness module is designed to offer specialised functionality, managed and updated by third-party providers. Updates to the provider's Privacy Notice and Terms and Conditions, can be reviewed directly using the links provided.

5.1 Activity Tracking

The updated privacy notice and terms for Activity Tracking can be accessed through a dedicated link below:

The Activity Tracking service provides real-time physical activity tracking by connecting to a Health App (Apple or Google), from the Smartphone. This enables automatic synchronised data transfers.

Historical data previously collected can also be reviewed to track progress.

The latest privacy notice and terms can be reviewed below:

Terms of Use:

Privacy Policy:

5.2 Nutrition

Weight management goals, tasks and diet duration can be set up together with the Activity Tracking for healthier lifestyle choices. Baseline and regular weight details are entered to track progress, food intake logged to track calories consumed and burnt.

The latest privacy notice and terms can be reviewed below:



Terms of Use:

Privacy Policy:

5.3 Mindfulness

By setting goals around common mental wellness topics, you will get related recommended guided meditation audio sessions as daily tasks. These tracks can be sampled individually or as part of recommendations from bespoke Personal programs. The content is continually refreshed and updated.

The latest privacy notice and terms can be reviewed below:

Terms of Use:

Privacy Policy:

5.4 Face Scan

Using the camera on your smartphone, this service leverages on the latest technology to scan your face and measure crucial vital signs in real-time such as heart rate and stress levels among other features and provides a health report.

Historical reports containing data from previous scans can be reviewed to track your health progress.

The latest privacy notice and terms can be reviewed below:

Terms of Use:

[Privacy Policy:](#)

5.5 Brain Games

These games and assessments crafted from a foundation of recognised neuropsychological evaluation tests, may be customised according to unique requirements to track specific brain functions within 5 domains explicitly Attention, Memory, Coordination, Perception and Reasoning.

Training games can be personalised in three 15-minute sessions.

Reports are generated for each session and historical data in previous reports can be reviewed to track progress.

The latest privacy notice and terms can be reviewed below:



Terms of Use:

Privacy Policy:

6 User Responsibility

By using the AXA Global Healthcare PP App and its associated wellness modules, you agree to review the privacy notices and terms provided by us and each third-party provider, as well as any updates. The App presents the notices for each module, at the time of first use, and can be accessed again, from this notice.

7 Information We Collect

7.1 Personal Information

We collect personal information that you provide when using our app and its wellness modules. This may include your name, email address, postal address, phone number, and other contact details. When you register for specific wellness modules, we may also require additional health-related information, which could include your medical history or current health conditions, to tailor the services to your needs.

7.2 Device and Usage Information

We gather information about the devices you use to access our app, such as hardware models, operating system versions, device configurations, IP addresses, and other unique device identifiers, a part of serving information on the web. We also collect usage data that helps us understand how you interact with our app, which includes the pages you visit, the links you click on, and other actions taken within the app. This data helps us improve and optimize our services and ensure technical functionality.

8 Information Collected Through AI Features

8.1 Wellness Module 4: Face Scan - Blood Pressure Monitoring Using Green Light Reflection

For wellness Face Scan, our app uses an innovative AI feature that monitors your blood pressure by analysing the green light reflection off your skin. This technology captures subtle



changes in light absorption caused by blood flow, allowing for non-invasive monitoring. This data is processed to provide you with real-time blood pressure readings.

9 Data Handling and Privacy

All data collected, particularly health data from our AI features, is handled with the care and compliance with applicable data protection laws. We ensure that the data is processed fairly and lawfully by our Wellness partners, with appropriate security measures in place to protect your personal information from unauthorized access or disclosure.

10 Health Data Access Permissions

10.1 Overview of Health Data Integration

10.2 Permissions Required

To fully utilise the wellness features, our app needs to access certain data from Apple HealthKit and Google's Android Health systems. Below is a list of the permissions that may be requested:

10.2.1 Apple HealthKit

- **Calories:** Access to calories burned during activities.
- **Active Energy Burned:** Access to the number of active calories burned.
- **Heart Rate:** Access to heart rate data.
- **Steps:** Number of steps taken.
- **Sleep Analysis:** Information about sleep patterns.

10.2.2 Google's Android Health

- **Calories:** Access to calories burned during activities.
- **Activity Data:** Information on physical activities and workouts.
- **Heart Rate:** Access to heart rate readings.
- **Steps:** Total step count.
- **Sleep:** Details about sleep duration and quality.



11 How We Use Health Data

- Details on how the health data accessed is used to provide personalized wellness services and features.
- Explanation of the AI-driven functionalities and how they utilize this health data.

12 User Consent and Control

- Information on how users can grant or revoke permissions through their device settings.
- Explanation of the implications of revoking these permissions on app functionality.

13 International Data Transfers

13.1 Overview of Data Transfers

At AXA Global Healthcare PP App, developed by CareVoice, we understand the global nature of the internet and the importance of protecting your personal and sensitive information across borders. Our operations involve sharing your data with entities and third-party service providers located in various countries around the world. This section explains how we handle such international transfers of your data, ensuring compliance with applicable data protection laws.

13.2 Entities Involved in Data Processing

CareVoice, the developer of our app, has partnerships and operational setups across different regions. As such, your data may be processed in any country where CareVoice or its service providers are located. This can include, but is not limited to, countries outside the European Economic Area (EEA) which may not have laws providing specific protection for personal data or have different legal standards on data privacy than your country of residence.

13.3 Safeguarding Your Data

We implement robust measures to ensure that your personal information receives an adequate level of protection wherever it is processed:

Data Transfer Agreements: We use standard contractual clauses approved by the European Commission and other legally recognised agreements to ensure that data transferred outside the EEA is adequately protected.

Binding Corporate Rules (BCRs): For transfers within AXA's Group Entities, we may rely on BCRs that allow our group companies to transfer personal data internationally while ensuring high standards of protection.



Consent: In certain situations, we may seek your explicit consent for the transfer of personal data to third countries, particularly in the absence of an Adequacy Decision or other suitable safeguards.

13.4 Security Measures

13.5 Commitment to Data Security

AXA Global Healthcare PP App ensures the security of your personal information is paramount. We are dedicated to protecting your data from unauthorized access, alteration, loss, or misuse. Our security measures are designed to provide a level of security appropriate to the risk of processing your personal information.

13.6 Technical Safeguards

Encryption: We use strong encryption technologies to protect data during transit and at rest. This includes the use of SSL/TLS protocols to secure data as it travels between your device and our servers.

Secure Servers: Our data is hosted on secure servers that are managed by reputable third-party service providers. Access to these servers is tightly controlled and monitored around the clock.

Access Control: Access to personal information is restricted to authorised personnel only, based on their job roles. We enforce a strict least privilege policy and regularly review access permissions to ensure they are appropriate.

Firewalls and Intrusion Detection Systems: We deploy advanced firewall technologies and intrusion detection systems to help prevent unauthorised access to our network and to monitor for suspicious activity.

13.7 Organisational Measures

Data Protection Training: All employees and contractors are required to complete data protection training. This training is designed to raise awareness about the importance of protecting personal information and to ensure that all team members understand their roles in maintaining our security posture.

Data Security Policies: We maintain comprehensive data security policies that govern the management, handling, and protection of personal information. These policies are regularly reviewed and updated to align with industry best practices and regulatory requirements.



Incident Response Plan: We have a formal incident response plan in place to address any security breaches. This plan includes procedures for containment, investigation, remediation, and notification to affected individuals and regulatory bodies, as appropriate.

13.8 Physical Security Measures

Secure Facilities: Our physical facilities are secured with controlled access, security personnel, and surveillance systems. Access to areas where personal information is stored is limited to authorised personnel.

Disposal and Redundancy: We employ secure methods for the disposal of personal data that is no longer needed. Additionally, we maintain backup copies of personal information and regularly test these backups to ensure data integrity and availability.

13.9 Continuous Improvement

Regular Audits and Assessments: We conduct regular security audits and risk assessments to identify potential vulnerabilities and to ensure continuous improvement of our security practices.

Technology Updates: We stay informed about emerging security threats and continuously update our security technologies and protocols to address new challenges.

13.10 Your Role in Securing Your Data

While we take strong measures to ensure the security of your data, security also depends on your actions. We encourage you to use strong, unique passwords for your accounts, enable two-factor authentication where available, and be vigilant against phishing attacks and other forms of online fraud.

14 Retention of Your Information

14.1 Overview

At AXA Global Healthcare PP App, we recognize the importance of retaining your personal information only for as long as necessary to fulfil the purposes for which it was collected.

This section explains our data retention practices for the AXA Group companies, including how we handle information within the wellness modules and the specific retention policies of our third-party developers.

14.2 General Retention Policy

Consistent with the practices of AXA Global Healthcare, as detailed in the attached privacy notice, we retain your personal information only for as long as necessary to provide the



services requested, to comply with legal obligations, resolve disputes, and enforce our agreements. Typically, this means that personal information is kept for the duration of your relationship with us plus a period of time thereafter as required by applicable law or necessary for specific operational purposes, such as auditing, corporate record-keeping, and compliance with data protection laws.

14.3 Specific Retention Practices for Wellness Modules

14.3.1 On-Device Data Storage

Health Kits: For wellness modules that monitor health-related metrics (e.g., blood pressure, activity levels, nutritional intake, and mental wellness), the data is primarily stored locally on your device within Apple Health or Google's Health Kit. This means the retention of such data is managed through your device settings, allowing you control over how long your data is kept on your device.

14.3.2 Developer Data Collection

Third-Party Developers: While much of the data is stored on-device, our app developers, including CareVoice, collect some information necessary to provide additional functionalities and enhance user experience. This may include data analytics, usage statistics, and personalized health recommendations, which are handled according to the specific privacy notices of the developers.

Data Usage: The information collected by developers is used strictly within the bounds of the provided services and is not shared with third parties except as specified in their respective privacy notices.

Retention Period: Developers retain this information only as long as necessary to fulfil the specified purposes. For instance, anonymized data used for improving app functionalities and user interfaces may be retained longer than personally identifiable information, which is deleted once no longer necessary for service provision or legal compliance.

14.4 Access and Deletion

You can access, manage, and delete your health data stored in Apple Health or Google's Health Kit at any time through the settings on your device. Similarly, for any data collected by our developers, you can exercise your rights to access, rectification, or erasure by contacting them directly as outlined in their privacy notices.



14.4.1 Compliance and Review

We regularly review our data retention policies in line with legal and regulatory requirements and adjust them as necessary to ensure they remain appropriate. Our commitment to protecting your privacy includes being transparent about our data retention practices and providing you with options to manage your information effectively.

By understanding these retention policies, you can better manage your personal and health-related information within our app and the associated wellness modules.

15 Use of Cookies and Tracking Technologies

15.1 Introduction

At AXA Global Healthcare PP App, we employ cookies and tracking technologies to enhance your user experience, improve the functionality of our app, and analyse how our services are used. This section provides detailed information about the types of cookies and tracking technologies we use, why we use them, and how you can manage your preferences.

15.2 What are Cookies and Tracking Technologies?

Cookies: Small text files placed on your device that collect data about your device and your interactions with our app. Cookies help us remember your preferences, understand how you use our services, and tailor content to your interests.

Tracking Technologies: Tools such as web beacons, tags, scripts, and pixels that help us understand user behaviour, track visitors' movements around our app, and collect demographic information about our user base as a whole.

15.3 How We Use These Technologies

Essential Cookies: Necessary for the operation of our app. They include, for example, cookies that enable you to log into secure areas. Without these cookies, some services cannot be provided.

Performance and Functionality Cookies: Used to recognise you when you return to our app and to embed functionality from third-party services. They also help us understand user preferences, thus improving your browsing experience. Disabling these cookies may result in poorly tailored recommendations and slow app performance.

Analytics and Customization Cookies: Allow us to track app usage and performance. These cookies help us improve our services by providing analytical data on how users use this app.



16 Marketing Preferences

16.1 Overview

At AXA Global Healthcare PP App, we believe in transparent communication and respect your preferences regarding marketing communications. This section outlines how we handle marketing activities, your choices regarding the receipt of promotional messages, and how you can update your preferences.

16.2 Marketing Communications

We use personal information that you provide to us along with information we collect about your interactions with our app and services to tailor and deliver personalised marketing messages. These communications may include new product features, special offers, and invitations to participate in promotional activities.

16.3 Types of Marketing Communications

Emails: We may send you emails about new product updates, exclusive offers, and upcoming events that we think might interest you.

Push Notifications: If you opt-in, we may send push notifications directly to your device to alert you about new features or promotions.

In-App Messages: While using our app, you might see pop-up messages that promote app features, products, or scheduled events.

16.4 Managing Your Marketing Preferences

Opt-Out of Email Marketing: You can opt out of receiving marketing emails from us at any time by clicking the 'unsubscribe' link at the bottom of each email.

Push Notifications: You can disable push notifications by changing the settings on your device.

In-App Messages: If you prefer not to receive in-app marketing messages, you can adjust your preferences within the app settings.

Third-Party Marketing

We do not share your personal information with any unaffiliated third parties for their marketing purposes. However, we may partner with third parties to offer advertising services. If you do not wish to receive marketing communications from our partners, you can opt out at any time by updating your cookie preferences in our app.



17 Your Rights

17.1 You have the right to:

- Request access to the personal information we hold about you and how we use it for marketing purposes.
- Request correction or deletion of your information.
- Object to the processing of your data for marketing purposes.

Withdraw consent at any time where we rely on consent to process your personal information. Consent is not the only lawful basis that we rely on for the processing of your personal data.

17.2 Changes to Marketing Preferences:

It's important to note that changes to your marketing preferences do not affect the processing of your personal information for non-marketing purposes. If you withdraw your consent for marketing communications, we may still contact you for administrative or transactional purposes, such as account management or system maintenance notices.

17.3 Commitment to Your Preferences

We are committed to respecting your choices regarding your personal data. If you have any questions about how we handle marketing communications or wish to discuss your rights and options, please contact us directly through the app or via email:

AGHComplianceReporting@axa.com

By managing your marketing preferences, you control how you engage with our content and what types of communications you receive from us, ensuring that they are in line with your interests and preferences.

18 Children's Privacy

18.1 Commitment to Protecting Children's Privacy

At AXA, and when using the AXA Global Healthcare PP App, we take the privacy of all our users seriously, especially the youngest. Our app and services are not designed for, nor intentionally targeted at, children under the age of 16. The app will not knowingly collect or solicit personal information from anyone under the age of 16.



18.2 Information on Dependents

Policy Holder Accounts: In instances where the main policy holder's account covers dependents who may be under 16, the account will display details pertinent to the policy but controlled entirely by the main policy holder or a legally recognised guardian. No direct access to the app is provided or intended for dependents under 16.

Control by Policy Holder: It is the responsibility of the main policy holder to manage the information within the app, including the data related to their dependents. The policy holder must ensure that they handle this data in accordance with applicable privacy laws and our privacy policy.

18.3 Safeguarding Dependent's Information

Data Privacy: For dependents under 16, any information displayed or processed through the app will be treated with the standards of data privacy and security required, consistent with our general user data policies and expectations in the jurisdictions where we operate.

Limited Use of Information: Information pertaining to dependents under the age of 16 will only be used for purposes directly related to the administration of the policy under which they are covered. This information is not used for marketing purposes or shared with third parties for their own use. No such information will be knowingly made available to vendors providing Wellness functionality or services.

18.4 Parental Consent and Access

Parental Rights: Parents or guardians of children under the age of 16, whose information might be managed by the main policy holder, have the right to review the child's personal information, request deletion, and refuse to allow further collection or use of the child's information, where such consent was previously given.

18.5 Updates and Contact Information

Review and Updates: This Children's Privacy section may be updated periodically to reflect changes in our practices concerning the collection and use of children's personal information or changes in regulatory requirements.

This section reaffirms our commitment to safeguarding children's privacy and ensuring that our practices comply with laws and regulations designed to protect children online.



19 Contact Us

19.1 Getting in Touch

If you have any questions about this Privacy Notice, our data practices, or your dealings with AXA Global Healthcare PP App, contact us using the methods below:

19.2 Contact Details

Email: You can email us directly for general inquiries or specific concerns related to privacy and data protection at AGHComplianceReporting@axa.com

Phone: Reach our customer support team by calling [Phone Number] during our business hours ([specify hours], [timezone]).

20 Appendix

20.1 Overview

This appendix serves to provide additional information and resources related to the Privacy Notice of AXA Global Healthcare PP App. It includes definitions of key terms, links to relevant legal documents, and further details on specific practices or technologies mentioned in the main body of the Privacy Notice.

20.2 Definitions of Key Terms

Personal Information: Data that can be used to identify an individual, including, but not limited to, name, address, email address, or phone number.

Cookies: Small text files stored on a user's device that collect data related to their browsing behaviour and device specifics.

Data Controller: The entity that determines the purposes and means of the processing of personal data.

Data Processor: The entity that processes data on behalf of the data controller.

Data Protection Officer (DPO): An expert on data privacy who works to ensure that an entity is adhering to the policies and procedures set forth in data protection laws.



21 Legal References and Documents

General Data Protection Regulation (GDPR): Regulation in EU law on data protection and privacy in the European Union and the European Economic Area. [Link to GDPR Document]

21.1 Links to Third-Party Privacy Policies

For your convenience, below are the links to the privacy policies of third-party service providers and technology partners associated with AXA Global Healthcare PP App:

Wellness Module Services:

- [Third-Party Provider 1 Privacy Policy URL]
- [Third-Party Provider 2 Privacy Policy URL]
- [Third-Party Provider 3 Privacy Policy URL]
- [Third-Party Provider 4 Privacy Policy URL]
- [Third-Party Provider 5 Privacy Policy URL]

Teladoc:

Carevoice:

22 Contact Information for Data Protection Authorities

Should you feel the need to escalate a complaint or if you believe that your data protection rights have not been adhered to, you may contact the relevant data protection authorities. Below is a list of authorities by region:

European Union: [Our Members](#) | [European Data Protection Board \(europa.eu\)](#)

United Kingdom: [Contact us](#) | [ICO](#)

Switzerland : [Homepage \(admin.ch\)](#)

23 Glossary of Technical Terms

A glossary is provided to help you understand specific technical terms and concepts used within this Privacy Notice:

SSL/TLS: Protocols for securing communications over a computer network.

Anonymisation: The process of removing personally identifiable information from data sets, so that the people whom the data describe remain anonymous.



This appendix is meant to supplement the information provided in the App Privacy Notice and help you navigate and understand our privacy practices more comprehensively. If you have any questions or need further clarification on any of the points discussed, please refer to the contact section of this document to get in touch with us.