



Privacy Notice

Last Updated: 30 July 2026

Cayman Integrated Healthcare Ltd., trading as One Health Cayman ("CIHL", "Company", "we", "us" or "our"), is committed to protecting the privacy, confidentiality and security of Personal Information collected, processed, stored or otherwise handled by CIHL in connection with its health-insurance products, member services, digital platforms, customer-support channels, insurance administration, claims handling and related services. This Privacy Notice explains how CIHL collects, uses, stores, shares, transfers and protects Personal Information, and describes the rights available to individuals under applicable Cayman Islands data-protection law.

CIHL collects processes, stores, and uses information in accordance with the applicable laws and is committed to take all reasonable precautions to preserve the integrity and prevent any corruption, loss, damage or destruction of the data and information. This Privacy Notice outlines how we collect, process, use, maintain, store, disclose, transfer, and protect, disclose your Personal Information obtained through our website, digital platforms, member portals, applications, customer support channels, insurance administration processes, and related services (collectively, the "Platform" or "Services"). It also provides you an overview of your rights.

Information Collected

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

- 1. Filling of Request for Proposal forms:** Groups and individuals are required to provide certain information for us to prepare a rate proposal for services. While availing the Group Insurance service, we shall not be collecting or processing any personal information, directly from the members during the application stage, except for employers' name, physical address, mailing address, main phone number and the member's gender, date of birth, relationship (employee spouse and children), coverage level, medical plan and dental plan to provide a quote for the group. For individual applications, immigration, employment status, personal health information and health history details are requested for underwriting, eligibility assessment, regulatory compliance, and insurance administration purposes.
- 2. Filling of onboarding documents for accepted proposals:** By accepting our proposal, the onboarding of employees and individuals/dependents into our system requires detailed information. The information collected may include items such as first name, last name, date of birth, gender, email address, phone number, employment status, name of employer (if employed), dependants' first name, last name, date of birth, gender, and relationship status. Additionally, if the members opt for receiving the policy in their mailing address, we shall enable the same by collecting their individuals mailing address. CIHL may also collect information necessary for digital member access, account authentication, communication preferences, security verification, and policy administration purposes.
- 3. Calling the Contact Centre/Web enquiries:** Government identifiers such as your Driver's License number or Passport number, when you call or write directly to us for any service-related queries or issues. Calls, emails, chats, and other communications may be monitored or



recorded for quality assurance, training, fraud prevention, security, and regulatory compliance purposes.

4. **Processing of Claims:** Additional information may be required for the purposes of issuance of policies and processing of your refunds, claims, payouts, etc. This might comprise of your information such as health information, which may be received through your Provider, and bank account details for claims payout. For group application we shall be directly communicating with the individual member for their claims processing.
5. **Information related to Dependant:** You also consent to the use, disclosure and sharing of the personal information about you or with respect to other members covered under the policy, dependant(s) (whether collected by the Company or received from third-party insurance agencies or provided by you), including but not limited to information about you or your dependants' health, physical attributes, medical history, and lifestyle, etc. by the Company. This will help you avoid repeat queries/tests, and help you avail the additional products, services or other new offerings as per the terms of this Privacy Notice.

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

CIHL may automatically collect limited technical information relating to your access and use of the Platform, including IP address, browser type, device identifiers, cookies, access timestamps, and usage analytics for security, fraud prevention, system administration, and service improvement purposes.

Certain information collected by CIHL, including health and medical information, may constitute sensitive personal data under applicable law and shall be processed only for legitimate insurance, healthcare administration, legal, regulatory, audit, or compliance purposes and subject to appropriate confidentiality and security safeguards.

Health, medical, claims and related information will be processed only to the extent necessary for insurance quotation, underwriting, eligibility verification, policy administration, member servicing, claims adjudication, case management, care coordination, refunds or payouts, fraud prevention, audit, regulatory reporting, complaints handling, legal claims and related insurance or healthcare administration purposes.

Consent

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

You acknowledge and confirm that you are authorized to provide such information relating to your dependants or covered beneficiaries and that they have been informed regarding the manner in which their Personal Information may be processed under this Privacy Notice.

Withdrawal of Consent

You have the right to withdraw your consent at any point, provided such withdrawal of the consent is intimated to us in writing through an email at dpo@onehealth.ky requesting the same. You may note that the consent withdrawal process will be done within a reasonable time, subject to applicable legal, regulatory, contractual, and insurance administration requirements not exceeding **30** days from the data of your request. If you wish to rectify the Personal Information that we may have collected to offer you personalized services and offers, you may write to the DPO (whose contact details are available in the subsequent sections), citing the reason for such rectification of Personal Information. Once you withdraw your consent to share the Personal Information collected by the Company, Further we may be unable to continue providing certain services, administering policies, processing claims, maintaining member access, or fulfilling the purposes for which such Personal Information was collected, Accordingly, the Company may restrict, suspend, or discontinue your access to certain services, benefits, digital platforms, or the website, subject to applicable law and regulatory obligations. we shall have the option not to fulfil the purposes for which the said Personal Information was sought and the Company may restrict you from using our services or the website.

How do we use your Personal Information

1. Provide the services offered by us including but not limited to personalizing user experience and sending you information about your insurance policy, your premium due dates, claims settlement details, etc.
2. Undertake identity authentication to establish and verify your identity and to prevent unauthorized access, fraud, misuse, or suspicious activities.
3. Undertake the on-boarding process or creation of your account CIHL may also use such information for account authentication, security verification, password recovery, and digital member access management purposes.
4. Conduct research and analysis to develop new products / services, improve our services / Platform, or to detect, prevent, mitigate, and investigate fraudulent or illegal activities.
5. Send you and/or your contacts (as permitted by you) relevant security notifications and operational communications.
6. To enable us to comply with any legal and regulatory obligations or information requests by any authority under the applicable laws including to enable us to proactively communicate with CIMA, or law enforcement agencies or any other government or judicial body in connection with any suspicious, illegal, fraudulent, or unlawful activities.
7. To enforce our legal rights against you.
8. For enabling customer support to you including to help us respond to your pre-sale and post-sale requests and support needs, including any claims and/or payout requests, efficiently and without delay. Customer support interactions, including calls, emails, chats, or other communications with CIHL representatives, *may be monitored or recorded for quality assurance, training, audit, security, fraud prevention, and regulatory compliance purposes, subject to applicable law.*
9. To help avoid repeat tests or checks or questions to and by you, and to allow you / your applicants dependants to avail the additional products, services, or other new offerings.
10. To contact you / other members covered under the policy / Dependant or otherwise communicate with you / Dependant to offer new products, services, facilities, features and/or discounts, as appropriate through any approved communication channels, subject to applicable law and communication preferences/consents where required.
11. Assess serviceability of services or features offered.
12. To assist you with exercising Data Subject Rights Requests including requests relating to access, correction, rectification, withdrawal of consent, restriction of processing, or complaints relating to Personal Information, subject to applicable law. Requests relating to access, correction, restriction, stopping processing, direct marketing preferences or automated

decision-making may be submitted to CIHL's Data Protection Officer at dpo@onehealth.ky. CIHL may request reasonable information to verify the identity and authority of the requester. CIHL will respond within applicable statutory timelines and may decline, limit or defer a request where permitted or required under applicable law, including where processing is necessary for legal, regulatory, contractual, medical, claims, audit, fraud-prevention or legal-rights purposes.

13. Perform internal operations necessary to provide our Services or the Platform, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends.
14. To contact you for refund or cancellation or confirmation of a purchase or failed transaction or the claims or payout process with respect to the Services, products and/or policies availed by you or wherein you have expressed interest or intent of purchase.
15. We use information to send you transactional communication. We might send you emails or SMS/es or messages through other technology enabled messaging apps or call you about your account, or use of the Services or the Platform or a policy purchase.

Processing for legitimate interests

CIHL processes Personal Information only where it has a legitimate interest under the Cayman Islands Data Protection Act. Depending on the context, CIHL may process Personal Information where such processing is necessary for:

1. Preparing quotations and taking pre-contractual steps requested by an individual or employer group;
2. Issuing and administering insurance policies and benefits;
3. Processing claims, refunds, payouts, case management and related healthcare-support activities;
4. Complying with statutory, regulatory, audit, reporting, anti-fraud, sanctions, anti-money laundering, insurance and health-insurance obligations;
5. Establishing, exercising or defending legal rights;
6. Protecting vital interests in limited cases;
7. CIHL's legitimate business interests, including security, fraud prevention, service improvement, complaints handling and operational administration, provided such interests are not overridden by the rights and freedoms of the relevant individual; and
8. Consent, where consent is required under applicable law or where CIHL offers an optional service or communication preference.

Where CIHL processes sensitive personal data, including health or medical data, CIHL will ensure that an additional condition for processing such data is satisfied under applicable Cayman Islands data-protection law.

Sharing of your Personal Data

1. Third parties such as but not limited to service providers for policy administration software, for enabling cloud services, to investigate and correct claims that resulted in denials, accounting of payables and receivables, bank and payment reconciliation, claim processing, business analytics, customer service support, document management and maintaining the financial ledger.
2. Demographic information to Hospitals, Pharmacies and Physicians to enable the required Healthcare services which includes *healthcare providers, clinics, laboratories, diagnostic centres*, and other authorized medical institutions involved in policy servicing, treatment coordination, claims administration, or healthcare support services.
3. CIMA and Health Insurance Commission on periodic basis for regulatory compliances and audits and compliance obligations under applicable Cayman Islands laws and regulations.



4. Other Insurance companies, Insurance databases to enable settling of any insurance claims or for valid verification of information by other insurance providers.
5. Dependant /Nominees or to *authorized representatives, guardians, beneficiaries*, or persons acting on behalf of the member, where permitted by the member, required for policy administration, claims processing, or otherwise permitted under applicable law.

Group Insurance

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

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

CIHL shall take reasonable administrative, technical, and organizational safeguards to protect Personal Information collected under group insurance arrangements and shall process such information only for legitimate insurance, healthcare administration, operational, or regulatory purposes in accordance with applicable law.

Transfer of your Personal Information

CIHL may transfer Personal Information outside the Cayman Islands where necessary for insurance administration, claims management, technology hosting, cloud services, customer support, regulatory compliance, audit, legal, fraud-prevention, payment, document-management or related operational purposes. Such transfers may include transfers to service providers, affiliates, reinsurers, third-party administrators, medical networks, healthcare providers, IT/cloud vendors and professional advisers located outside the Cayman Islands.

CIHL will take reasonable steps to ensure that such transfers are made in accordance with the Cayman Islands Data Protection Act, including by assessing the destination jurisdiction, the nature of the data, the purpose of transfer, applicable safeguards, contractual protections, confidentiality obligations and security measures. Where appropriate, CIHL will use data-processing agreements, data-transfer agreements, standard contractual clauses or equivalent contractual safeguards.

Data Subject Rights

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

1. Right to Access Information

You have the right to request for:

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

2. Right to Correction or Erasure You have the right to request for:

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

3. Right to stop processing



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

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

4. Right to stop processing via Digital Marketing

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

5. Right in relation to automated decision making

A data subject is entitled at any time, by notice in writing to a data controller, to require the data controller to ensure that no decision taken by or on behalf of the data controller that significantly affects the data subject is based solely on the processing by automatic means of the data subject's personal data for the purpose of evaluating the data subject's performance at work, creditworthiness, reliability, conduct or any other matters relating to the data subject. The data subject has the right to request human intervention, to express your point of view, and to contest the decision, in accordance with the DPA.

Security

We may collect and store your personal data in electronic and/or physical form, depending on the requirement. Information may be stored at our and third-party premises within IT Systems (e.g., external cloud storage, internal or third-party management systems, e-mails, databases, hard drives), document warehouses, etc including systems hosted or managed by authorized cloud service providers, IT vendors, third-party administrators, or other service providers engaged by CIHL for legitimate operational or insurance administration purposes.

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

1. Encryption
2. Strict adherence to privacy and security practices
3. Periodic security assessments and reviews to upgrade our practices
4. Restriction of access to personnel who have a need to know such data.
5. Implementation of reasonable backup, disaster recovery, business continuity, and incident response measures, where applicable.
6. Monitoring and logging of system access and activities for security, audit, fraud prevention, and regulatory compliance purposes, subject to applicable law.

Breach Notification

In the event of a personal data breach, CIHL will assess the nature, scope, likely consequences and risk to affected individuals. Where notification is required under the Cayman Islands Data Protection Act, CIHL will notify the Office of the Ombudsman and affected individuals without undue delay and in any case no longer than 5 days after the data controller should, with the exercise of reasonable diligence. Such notification may describe the nature of the breach, likely consequences, measures taken or proposed by CIHL, and steps individuals may take to mitigate potential adverse effects.

Where a cybersecurity incident is deemed to have a material impact or has the potential to become a material incident, CIHL will also assess and make any notification required to the Cayman Islands Monetary Authority in accordance with applicable CIMA rules, statements of guidance and regulatory



expectations. CIHL will maintain internal escalation, investigation, containment, remediation, recovery and post-incident review processes to support timely regulatory and data-subject notifications.

How Do We Ensure Children's Privacy?

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

CIHL shall take reasonable measures to limit the collection and processing of children's Personal Data to only such information as is necessary for policy administration, dependent coverage, claims processing, healthcare servicing, regulatory compliance, or related insurance purposes.

How Do We Use Cookies and other Tracking Mechanisms?

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

Data Retention

CIHL will retain Personal Information only for as long as reasonably necessary for the purposes for which it was collected or subsequently processed, including policy administration, claims handling, customer support, regulatory reporting, audit, accounting, fraud prevention, complaints handling, legal proceedings, enforcement of contractual rights and compliance with CIMA, HIC, insurance, health-insurance, tax, accounting, anti-money laundering and other applicable legal or regulatory requirements.

Where Personal Information is no longer required for such purposes, CIHL will take reasonable steps to delete, anonymise, archive, restrict or securely dispose of it, subject to applicable law, regulatory expectations, backup-retention practices and legal-hold requirements.

Data Protection Officer

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

CIHL may require reasonable information or documentation to verify the identity and authority of the requesting individual before processing any privacy-related request or grievance.

Where required under applicable law, unresolved complaints may also be referred to the Office of the Ombudsman or other competent regulatory authority in the Cayman Islands.

Notification of Changes

We may update this Privacy Notice from time to time. For minor changes, we will update the 'Last Updated' date at the top of this Notice. Continued use of our services after material changes have been notified to you shall constitute acceptance of those changes.