Privacy Notice and Personal Data Use



1 LEGAL NOTICE

Best Doctors Insurance, and each of its affiliates and providers, hereinafter collectively referred to as "Best Doctors", require that every 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', affiliates', 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 Notice applies to people who voluntarily provide Personal Data for purposes described in this Notice and concerning the products and services offered by Best Doctors.

7 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, as well as its providers, under the terms and privacy conditions described in this Notice and in compliance with the Privacy Policy available on the Sites.

3 HEALTH INSURANCE SERVICES
The benefits and coverage referred to on the Sites are subject to each insurance policy's terms, conditions, and restrictions, as established in the contract provided by Best Doctors to the User.

WHAT IS PERSONAL DATA?

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

Best Doctors certifies that its treatment of Personal Data is carried out in compliance with security standards and guarantees the legally recognized rights of its holders in compliance with applicable regulations.

5 USE OF PERSONAL DATA

Best Doctors handles the Personal Data of its clients, affiliates, and Users in a strictly private and confidential manner, and only uses them for the purposes described in this Notice. Their treatment, use, or transfer is done legally and responsibly, safeguarding the right of consent, responsibility, and purpose for which the data was gathered, in compliance with current applicable legislation.

- LAWFUL BASIS FOR PROCESSING PERSONAL DATA
 Access to and use of the Sites are subject to current
 legal provisions. Likewise, Personal Data collected
 by Best Doctors through the Sites or by any physical,
 electronic, audible, or other means, will be treated in
 strict compliance with applicable regulations.
- 7 PERSONAL DATA COLLECTION

 Best Doctors is committed to safeguarding the privacy of Personal Data and maintaining a close and active relationship with its clients, affiliates, and Users. 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.

Personal Data, including that of a sensitive nature, provided by our clients, affiliates, and Users through applications, calls, and other types of contact such as questionnaires and contract-related formats, as well as that provided through third parties authorized by Best Doctors including electronic, visual, audio, or by any other means and technology, and that generated as a result of the legal relationship with our clients, affiliates, 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, affiliates, and Users:

- Personal Data: assets, banking and financial, identification, employment, hobbies, academic, driving, and immigration data; data on legal procedures, lawsuits and/or jurisdictional proceedings, and all kinds of telephone call records that Best Doctors keeps regarding our clients, affiliates, 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.
- 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 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, affiliates, 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 facilitate providing a better service for:

 Offering and promoting goods, products, and services and/or commercial prospects by direct or indirect Best Doctors' entities.

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- Marketing, advertising, and evaluating Best Doctors' products and services, including free delivery of samples, promotional items, or gifts.
- Sending event invitations.
- Contacting, by any means, to assist with requests, complaints, and/or claims.
- Managing direct sales of Best Doctors' products or services.
- Conducting surveys, market studies, and/or confirming Personal Data.
- Analyzing internal statistics or sending notices of service improvements.
- Informing authorities to whom the information is pertinent or indispensable.
- Analyzing and supporting the fulfillment of a legal duty, regardless of its nature.
- Verifying financial entities and receiving payments made by Best Doctors' clients, affiliates, and Users regarding contracted services.
- Reporting, querying, or modifying Personal Data, as well as for reporting breaches of contractual obligations.
- Transferring of Personal Data to medication providers associated with Best Doctors so that customers can access discounts or other benefits.

If User disagrees with processing their Personal Data for the purposes described above, they can email dataprivacy@bestdoctorsinsurance.com or mail it to 5201 Blue Lagoon Drive, Suite 300, Miami, Florida 33126.

Opting out of the secondary purposes to use Personal Data may not be a reason for Best Doctors to deny products or services offered by the insurance policy.

INFORMED AND VOLUNTARY CONSENT

Best Doctors may receive or collect Personal Data through its Sites, applications, devices, brand or product pages, through social media networks, or by any other means or channel. 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 treat, use, and transfer their Personal Data through any of its modalities, means, or supports (local or cross-border), directly or indirectly, virtually or physically, for the purposes described in this Notice.

USER'S RIGHTS RELATED TO THE USE OF THEIR PERSONAL DATA

Best Doctors recognizes and will observe the User's rights regarding their Personal Data, especially for the following:

- Have free access to their provided Personal Data that has been processed.
- 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 and/or request the deletion of their Personal Data unless there is a legal or contractual duty that makes it necessary to keep the information.

- Refrain from answering questions about sensitive data.
- Request the modification and/or elimination of their Personal Data stored in Best Doctors' databases.
- Request immediate access to their Personal Data.
- Exercise the right to the portability of their Personal Data and the right to suspend its treatment.

Regarding the treatment of sensitive health, biometric, and genetic data, Best Doctors guarantees that it will always be subject to confidential standards and will be protected against unauthorized or illegal treatment, theft, damage, or loss.

TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Through this Notice, Best Doctors informs clients and Users that it can transfer their identification and contact Personal Data (non-sensitive) to national or foreign third parties, including subsidiaries, affiliates, or related companies and service providers with which Best Doctors maintains a contractual relationship, for purposes including but not limited to the following:

- To financial authorities to comply with obligations derived from laws or international agreements related to Best Doctors' activities, tax obligations, and compliance of notifications or official requirements.
- To judiciary authorities to comply with notifications, requirements, or judicial orders.
- To sector institutions, organizations, or entities for fraud prevention and risk selection.
- To providers of health-related services.
- To other providers to comply with the contractual obligations that Best Doctors has with its clients, affiliates, and Users.
- To companies or service providers to contact Best Doctors' clients, affiliates, and Users to carry out promotional activities and/or offer products and/or services that those companies or service providers could market and/or offer jointly with Best Doctors.

Furthermore, Best Doctors may transfer its clients' and Users' Personal 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 made to holding companies, subsidiaries, or affiliates under the common control of the one in charge, a parent company, or any of the companies in the Best Doctors groups that operate under the same internal processes and policies.
- When the transfer is required under a contract signed or about to be signed by Best Doctors and a third party in the interest of the Personal Data owner.
- When the transfer is necessary or legally required to safeguard public interest or to seek or administer justice.
- When the transfer is necessary to recognize, exercise, or defend a right in a judicial process.

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- When the transfer is necessary to maintain or fulfill a legal obligation between Best Doctors and the client, affiliate, or User.
- When obtained from a public source.
- 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, affiliate, or User.
- If necessary, to protect the vital interests of the clients, affiliates, or Users in case they cannot provide their consent.
- For preventive medicine purposes or to obtain a medical diagnosis.
- To provide health or social assistance or treatment.

TOOLS AND PROCEDURES TO REVOKE THE CONSENT OF PERSONAL DATA PROCESSING

At any time, Best Doctors clients, affiliates, 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 our clients, affiliates, and Users Personal Data due to legal obligations.

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

To revoke consent, a Best Doctors client, affiliate, or User must send a message by email to dataprivacy@bestdoctorsinsurance.com 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, affiliate, or User does not want their Personal Data to be processed for the secondary purposes specified in this Notice or to be transferred to third parties for the purposes described in this Notice, they must withdraw their consent.

Best Doctors' clients, affiliates, and Users have the right to access, rectify, cancel, and oppose the processing of their Personal Data. As the owner of their Personal Data, the client, affiliate, or User has the right to know which ones are kept by Best Doctors. If they are inaccurate, outdated, or incomplete, the client, affiliate, or User must correct them (Rectification) or, when they are excessive or unnecessary for the described purposes that justified obtaining them or consider that they are not being used for the purposes they were granted for, the client, affiliate or User must request that they be no longer used (Cancellation) or may oppose their use for certain purposes (Opposition).

The client, affiliate, or User may limit the use or disclosure of their Personal Data by registering in the **Do Not Contact for Marketing Purposes** list. Their Personal Data will not be used for marketing, advertising, or commercial prospecting, or evaluating

Best Doctors' products and services. To request the limitation or revocation of consent regarding the processing of Personal Data and/or to exercise the rights described above, the client, affiliate, or User must email dataprivacy@bestdoctorsinsurance.com. Best Doctors will respond to their request as soon as possible and inform them about the results derived from exercising their rights.

PERSONAL DATA STORAGE, PRIVACY AND SECURITY
The Personal Data collected by Best Doctors will be
incorporated and processed in the Best Doctors Data

incorporated and processed in the Best Doctors Data Bank. Automating this data will guarantee the technical, organizational, and legal security measures taken for their treatment, including cross-border transfers.

To prevent unauthorized access to the client's, affiliate's, and User's Personal Data and guarantee that the information is used for the purposes established in this Notice, Best Doctors has implemented physical, electronic, and administrative procedures that limit their use or disclosure and allow Best Doctors to handle them properly.

Best Doctors has adequate and sufficient technological measures to guarantee the protection of its clients', affiliates', and Users' Personal Data, which are periodically evaluated. Nevertheless, there is the possibility of involuntary leakage or unauthorized access by third parties to said data, in which case Best Doctors will notify the corresponding authorities and its clients, affiliates, and Users 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', affiliates', and Users' Personal Data and communications. However, registrations or enrollments made by the client, affiliate, or User in any type of discussion board will not be considered confidential, so Best Doctors may use and transmit the information registered in their favor.

COMMUNICATION CHANNELS AND RESPONSE TIME

For more information about Best Doctors' Privacy Policy, Personal Data processing, and asserting rights regarding the treatment of Personal Data, the client, affiliate, or User can email a request, query, and/or complaint to dataprivacy@bestdoctorsinsurance.com.

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

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.