Apeiron International

Group Customer Data Protection & Privacy Policy

1. Introduction and scope

Apeiron International Limited and its affiliates, subsidiaries, and related entities (collectively, "Apeiron", "we", "us" or "our") are committed to protecting personal data and respecting the privacy of individuals whose personal data we collect, use, disclose, or otherwise process.

This Customer Data Protection and Privacy Policy ("Policy") sets out the principles and practices governing how Apeiron handles personal data in connection with:

- the provision of insurance advisory, brokerage, distribution, and related services;
- interactions with prospective clients, clients, introducers, business partners, and other members of the public; and
- use of our websites, digital platforms, and communications.

This Policy is intended to be a general group-level privacy policy and may be referenced in contracts, application forms, engagement letters, and other documents. Where required by law, more specific or supplemental privacy notices may be provided.

This policy is last updated in February 2026.

2. Applicability across jurisdictions

Apeiron operates internationally, including through offices or operations in Singapore, Hong Kong, the Dubai International Financial Centre (DIFC), and the United States. Accordingly, personal data may be processed under different data protection laws, including but not limited to:

- Singapore's Personal Data Protection Act (PDPA),
- Hong Kong's Personal Data (Privacy) Ordinance (PDPO),
- DIFC Data Protection Law,
- applicable US federal and state privacy laws

This Policy is designed to reflect globally recognised data protection principles. Where local laws impose additional or different requirements, those laws will prevail to the extent of any inconsistency.

3. Data controller and responsibility

The relevant Apeiron entity with which you interact will generally act as the data controller of your personal data. In some circumstances, Apeiron entities may jointly determine the purposes and means of processing, or process personal data on behalf of another Apeiron entity.

Apeiron maintains internal governance arrangements to ensure accountability for personal data protection across the Group, including the appointment of a Data Privacy Officer or equivalent function.

4. How personal data is collected

Apeiron may collect personal data in a number of ways, including:

- directly from you when you engage with us, submit enquiries, complete forms, or communicate with us;
- indirectly from third parties who have a lawful basis to provide your data, such as introducers, insurers, medical professionals, professional advisers, or service providers;

- from publicly available sources, registers, or databases, where permitted by law; and
- automatically through our websites and digital platforms (for example, through cookies and similar technologies).

Where required by law, we will obtain your consent before collecting or processing your personal data.

5. Categories of personal data

Depending on the nature of your relationship with Apeiron, the personal data we process may include:

- identification and contact information;
- personal and demographic information;
- financial and transactional information;
- information relevant to insurance underwriting, administration, or claims;
- health or medical information, where necessary and permitted by law;
- regulatory, compliance, or due diligence information; and
- technical and usage information relating to websites or digital platforms.

We endeavour to collect only personal data that is relevant and necessary for legitimate business or legal purposes.

6. Purposes of processing and lawful bases

Apeiron processes personal data for purposes that include:

- providing and administering our services;
- assessing suitability, arranging quotations, policies, or related services;

- complying with legal, regulatory, and compliance obligations (including anti-money laundering and counter-terrorism financing requirements);
- managing relationships with clients, introducers, and business partners;
- operating, maintaining, and improving our systems, platforms, and websites; and
- protecting our legitimate business interests, including risk management, security, and fraud prevention.

Personal data is processed on one or more lawful bases, which may include consent, contractual necessity, legal obligation, or legitimate interests, depending on the circumstances and applicable law.

7. Disclosure and sharing of personal data

Apeiron may disclose personal data to:

- other Apeiron group companies, where necessary for operational, administrative, or service-related purposes;
- insurers, reinsurers, intermediaries, and other parties involved in the provision of insurance-related services;
- professional advisers, auditors, IT providers, and other service providers;
- regulators, courts, law enforcement agencies, or authorities, where required or permitted by law; and
- other third parties with your consent or as otherwise permitted by applicable laws.

We take reasonable steps to ensure that recipients of personal data are subject to appropriate confidentiality and data protection obligations.

8. Cross-border transfers

Given the international nature of Apeiron's operations and service providers, personal data may be transferred to, stored in, or accessed from jurisdictions outside the country in which it was originally collected.

Where cross-border transfers occur, Apeiron implements appropriate safeguards in accordance with applicable data protection laws, which may include contractual protections or other recognised transfer mechanisms.

9. Data security

Apeiron applies reasonable and proportionate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, alteration, or disclosure.

These measures are designed having regard to the nature of the data, the risks involved, and industry standards. While we strive to safeguard personal data, no system or transmission method can be guaranteed to be completely secure.

Apeiron strives to protect the security of your information and is constantly reviewing and enhancing its information security measures.

10. Data retention

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, or as required to meet legal, regulatory, or legitimate business obligations.

When personal data is no longer required, it is securely deleted, anonymised, or otherwise disposed of in accordance with applicable laws and internal retention practices.

11. Individual rights

Subject to applicable laws, individuals may have rights in relation to their personal data, including rights to:

- access and obtain a copy of their personal data;
- request correction of inaccurate or incomplete data;
- withdraw consent, where processing is based on consent;
- object to or request restriction of certain processing activities; and
- lodge a complaint with a relevant supervisory or data protection authority.

Requests will be handled in accordance with applicable legal requirements, and we may need to verify identity before responding.

12. Updates to this Policy

Apeiron may update this Policy from time to time to reflect changes in laws, regulations, business practices, or technology. The most recent version will be made available through appropriate channels and will be identified by its effective date.

13. Contact information

If you have questions, concerns, or requests relating to this Policy or the handling of personal data, please contact:

Data Privacy Officer

Apeiron International Limited
c/o 16/F, Printing House, 6 Duddell Street, Central, Hong Kong
Email: info@apeirongroup.com