

## **Privacy Statement of Health Aspire**

### **Introduction**

#### **Welcome to Aspire!**

**Aspire** means **Aspire Solutions Operations Health Insurance Claims Management L.L.C.** and any affiliate, subsidiary or entity controlled, controlled or under the general control with Aspire (together and each of them as the context may require “Aspire”, “we” or “us”)

Aspire is committed to protecting personal data received from users. Accordingly, this Privacy Statement explains how and what types of personal data will be collected and used, transferred, stored, or otherwise processed ("use"), why it is collected and used and with whom it will be shared.

This privacy statement applies to personal data collected and used by Aspire and to what concerns your interactions with Aspire's services and Aspire's Platforms .

**Aspire Platforms** or **Platform(s)** refers to any digital platform that is operated by Aspire (including any mobile application and related website) which facilitates the operation of your Account and the provision of Aspire's Services. Terms not defined herein have the meaning given to them in our [Terms and Conditions of Service](#).

You are required to read this statement before providing us with any personal data.

By accessing the Aspire Platforms you agree to this Privacy Statement. If you do not agree, please refrain from accessing our Platforms.

This Privacy Statement may be updated from time to time, so we recommend reviewing it regularly. The last line of this Privacy Statement below indicates when the Privacy Statement was updated. We will notify you of any material update upon your next visit to the Aspire Platforms

### **1. Data Controlling and Data Processing**

Aspire, in the context of providing TPA (Third-Party Administrator) services to insurance companies (which may include insurance intermediaries) acts a Data Processor. That means we determine the purposes and means of processing personal data related to our Services. This may be done together with the insurance companies we service who is the Data Controller. Information such as but not limited to

- Medical records
- Claims adjudication with denials
- Remittance Advice
- Fraud Waste and Abuse analysis
- Provider network with categories
- Pricelists
- Regulator reports

## **2. Data Collection**

We may obtain your personal data from you directly or from any third party, including but not limited to:

- Employers
- Policy sponsors
- Brokers
- Business partners
- Insurers
- Medical providers
- Fraud prevention agencies
- Investigators
- Regulators
- Search information providers
- Intermediaries
- Delegated authorities

We may collect various types of personal data depending on your interaction with Aspire. These may include:

- Full name
- Contact details (address, email address, phone number)
- Date of birth
- Gender
- Nationality
- National ID
- Marital status
- Occupation
- Language
- Child Information (only for insured dependents)
- Physical and psychological health conditions
- Medical reports and claim history
- Treatment data and records
- Credit/debit card and bank account details (only when necessary for claims processing)

## **3. Legal Ground and Purposes of Processing**

We need to use your personal data for the performance of the contract we have with the insurance company and that you or the relevant third party (such as your employer) has with the insurance company, as well as the contract between you and Aspire (being our Terms and Conditions of Service). Where the use of your personal data is not needed for such contract performance, you grant us your consent to use your personal data as set out in this Privacy Statement by creating an Account and/or accessing our Platforms. Where necessary under applicable laws and regulations we will seek to obtain your explicit consent.

We will use your personal data, or delegate the use of your data to (sub-)processors, for several purposes, including, but not limited to:

- Managing insurance claims efficiently and accurately
- Technical administration, research, and development of our services

- Customer and user administration, including marketing communication.
- Informing you about our products and services
- Fraud prevention and detection
- Fulfilling legal obligations, such as tax and regulatory requirements

Subject to United Arab Emirates's Federal Law No. 45 of 2021, these are legitimate interests and/or interests and/or legal obligations including the following reasons for the processing of your personal data without your explicit consent:

- For the performance of the purpose if processing is necessary to perform the contract or if you request processing to enter any contract.
- To protect your vital interests or to comply with a legal obligation to which you are subject.
- Public interest and public health: The processing is necessary to protect public interest or public health as per the United Arab Emirates's Federal Law No. 45 of 2021 (the UAE Data Protection Law).

#### **4. Data Sharing**

To provide our services effectively, we may share your personal data with the following parties:

- Insurance companies and their employees
- Healthcare providers and affiliated entities
- Third-party providers for fraud detection and approval screening solutions
- CarePay group entities and other (sub-)processors supporting our Platforms.
- Social media platforms (only when you interact with our plugins)
- Relevant authorities, regulators, or ombudsmen (in case of complaints)
- Any other Aspire partner entities.
- Google Analytics (See related section below for more information)
- Social media plug-ins (see related section below for more information)

We will not share this personal data with any third party other than if necessary to fulfil the purposes.

Your personal data may be processed by Aspire and by the parties specified above, which is always subject to contractual restrictions regarding privacy and security in line with applicable data protection laws and regulations. We will not disclose your personal data to third parties who are not authorized by us to process them.

#### **5. Technology Platforms, Cookies, and other Third Parties**

We utilize tools to analyse user actions, gain insights on Platform usage, and enhance the user experience. We also engage other third-party processors to facilitate the development, operation, and monitoring of our Platform, as well as to address technical issues.

Where necessary to develop, operate and improve the Platforms, we share data with our third-party processors, including Aspire's technology partner, CarePay.

Other third-party processors supporting our Platforms may process data on their own servers which may have various locations subject to local data protection laws. In each case, all

processing is subject to contractual clauses safeguarding data privacy and is only done for as long as necessary for the purpose of developing, operating and improving the Platforms. As our Platforms and Services continuously evolve, the third-party processors may change over time. You can find information on some of them below and can contact us for any further information on this.

### **5.1 Amazon Web Services**

Our Platform is hosted by AWS (Amazon Web Services) on their cloud servers located in the United Arab Emirates, and they process the Platform data, that means AWS processes the Platform data, including personal data.

### **5.2 Cookies Notice**

When you visit our commercial website and Platforms, we may use cookies to enhance your browsing experience. These cookies are small files that request permission to be placed on your device. Once you agree, they are added, and they help analyze web traffic and recognize your visits to specific sites. Cookies allow us to customize our web applications based on your preferences and provide you with a personalized experience.

We respect your right to privacy and provide you with a cookies management tool to help you manage your preferences and provide consent. By clicking on various category headings, you can learn more and change our default settings, except for strictly necessary cookies, which will be enabled unless you actively choose otherwise. However, please note that blocking certain types of cookies may impact your experience on the Platforms and the services we offer.

We use traffic log cookies to identify the pages being used, which helps us analyze webpage traffic and improve our website to better meet user needs. The information from these cookies is only used for statistical analysis purposes, and it is then removed from the system.

Overall, cookies enable us to monitor which pages you find useful and improve the website accordingly. They do not grant us access to your device or any personal information unless you choose to share it with us. You can deactivate cookies via the cookie settings.

You have the option to accept or decline cookies through your web browser settings. While most browsers automatically accept cookies, you can modify these settings to decline cookies if you prefer. However, this may limit your ability to fully utilize our website's features.

#### **5.2.1 Functional cookies (always active)**

These cookies are necessary for the application to function and cannot be turned off in our system. They are usually only set in response to actions you take that amount to a request for services, such as setting your privacy preferences, logging in, or filling out forms. You can set your browser to block or alert about these cookies, but some parts of the site will then not work.

#### **5.2.2 Analytical Cookies**

These cookies allow us to calculate visits and traffic sources so that we can measure and improve the performance of our Platforms. They help us know which pages are the most and least popular and see how visitors move around the site. Information is collected by these cookies on a fully pseudonymized basis so that it does not directly lead to you or other users. If you do not allow these cookies, we will not know when you have visited our site and will not be able to monitor its performance.

### **5.3 Hyperlinks and Referenced Websites**

Hyperlinks may take you to third-party websites in the Platforms or our other websites for some convenience.

These third-party websites are not maintained by us and if you log in to other websites you will be subject to their terms and conditions.

We shall not be liable for the adequacy, accuracy, reliability, or completeness of any information on hyperlinks or referenced websites and will not expressly claim any liability for any and all of their content.

Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **5.4 Social Media Plugins**

The Aspire Website ([www.healthaspire.com](http://www.healthaspire.com)) uses the following social media plugins ("Plugins"):

1. Facebook Share Button powered by Meta Inc., 1 Hacker Way Menlo Park, CA 94025, USA
2. Tweet Button powered by Twitter Inc., 1355 Market Street, Downtown San Francisco, California, USA
3. LinkedIn Share Button operated by LinkedIn Corporation, 1000 W Maude Ave, Sunnyvale, CA, USA
4. Google Share Button operated by 1600 Amphitheatre Parkway in Mountain View, California, USA
5. Instagram Share Button operated by Instagram Inc, 181 South Park Street Suite 2 San Francisco, CA 94107, USA

All Plugins are marked with the brand of the respective operators Facebook, Twitter, LinkedIn, etc. ("Operators").

If you interact with the plugin, for example by clicking on the "Facebook button", "Google button", "Tweet button" or "LinkedIn share button", the related information is transmitted directly from your browser to the operator and stored by it. In addition, the information will be made public in the relevant social network or your Twitter account and shown to your contacts. If you do not want to transfer such data to operators, you will need to log out of your respective account before clicking on the plugins and activating them.

To find out more about the purpose and scope of data collection and processing and use please see the operators' data privacy statement:

## **6. Data Security Measures**

Providing you with a safe online experience is a high priority for us. We believe that your privacy and security are of utmost importance, and we have devoted a lot of time and effort to ensuring that your personal information is safe. Please be aware that you are personally responsible for securing your Account information.

Aspire implements appropriate technical and organizational measures to protect your personal data from unauthorized access, misuse, loss, or destruction. We use encryption and secure protocols to ensure the confidentiality and integrity of your information.

All electronic messages sent to and from Aspire are protected by appropriate technical and organizational measures and can only be accessed in appropriate cases consistent with applicable laws and regulations (e.g., court orders for specific persons in defined actions (e.g., legal, compliance, risk), suspicion of criminal conduct, violation of regulatory obligations).

Where it is not important for us to know exactly who the Platform user is, we process user data in pseudonymised form.

To help protect your personal information, we follow good practices for encryption of data in transit. Encryption involves the use of sophisticated algorithms to scramble personal information that is being transferred to and from us. Any data transmitted between applications on our servers on your device is held using SSL and TLS encryption, which ensures that your data is encrypted, preventing man-in-the-middle attacks.

## **7. Data Retention**

We will retain your personal data for ten (10) years from the date of receipt of your data or for any longer period required by applicable laws. We will not retain your personal data for longer than necessary and we will only keep it for the purposes for which it was obtained.

## **8. Your Rights**

As a user of Aspire's services, you have the following rights concerning your personal data:

- Access: You can request information about the personal data we hold about you.
- Rectification: You can ask us to correct any inaccurate or incomplete data.
- Erasure: You have the right to request the deletion of your data under certain circumstances.
- Objection: You can object to the processing of your personal data in certain situations.
- Restriction: You can request the restriction of data processing while we assess your request for rectification, erasure, or objection.
- Right to request transfer: You have the right to obtain your personal data in a machine-readable format and the right to request transfer of your data to another controller.

Right to withdraw consent : You have the right to request for withdrawal of consent.

## **9. Contact Information**

If you have any questions, concerns, or requests regarding your personal data and this Privacy Statement, please contact us at:

Aspire Solutions Operations Health Insurance Claims Management L.L.C. 4303, Al Salam Tower, Media City, Sheikh Zayed Road, Dubai, UAE,  
P.O. Box: 186907  
Tel: +971 42607800  
Email: Aspire Centre of Excellence [ace@healthaspire.com](mailto:ace@healthaspire.com)

## 10. Updates to the Privacy Statement

This Privacy Statement may be updated from time to time. We recommend reviewing it regularly for the latest version. The last update date will be indicated at the end of the document.

this Privacy Statement was last updated on 01/Nov/2023

## 11. Further Information

For information on how your data is processed within the country, please see the following notice: <https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws>

For international claims, please see the following notice on how your data is processed <https://ai.gov.ae/personal-data-protection-law/>

For all other postal addresses, please see [www.healthaspire.com](http://www.healthaspire.com)

If you would like to exercise a data subject right, you may contact our officer as below.

In case of any concerns related to Data Subject rights kindly check on

<https://www.rgare.com/our-company/responsibility/policies-and-governance-center/rights-requests>.

Or email to [dsr@rgare.com](mailto:dsr@rgare.com)

Aspire Data Protection Officer may be contacted on email [dpo@healthaspire.com](mailto:dpo@healthaspire.com)

## 12. How do we make changes to this Privacy Notice?

You may request a copy of this Privacy Notice from us using the contact details set out above. We may modify or update this Privacy Notice from time to time. If we make a significant change to this Privacy Notice, we will post a notice about this on our website, and we may provide the notice directly to you.

Last updated : 01/Oct/2023

Thank you for choosing Aspire. We are dedicated to providing you with excellent service while respecting your privacy and protecting your personal data.