PING AN
Expertise Creates Value

Expertise Makes Life Simple

Policy Statement on Privacy Protection of Ping An Group

September, 2025

This policy statement applies to the Ping An Insurance (Group) Company of China, Ltd. and its all member companies.

In the era of big data, privacy protection has become particularly important in establishing and protecting corporate reputation and gaining customer trust. Ping An, as a responsible provider of integrated financial and healthcare services, regards privacy protection as the top priority of its information security and data governance. Ping An is committed to handling personal privacy information in a responsible and legally compliant manner and upholding high standards to protect personal privacy.

Scope of Application

This policy statement applies to the Ping An Insurance (Group) Company of China, Ltd. (hereinafter referred to as "the company"), all member companies and related business lines, all departments, employees, and third-party personnel (including but not limited to suppliers, outsourcing staff, agents, vendor engineers, consulting firm advisors, etc.). It also covers the personal information data collected by all business segments of Ping An.

Principles of Personal Information Protection

Ping An's business is based on mutual trust with users. In order to protect all information provided by users, Ping An adopted the following principles for the protection of personal information:

- The collection of personal information should be confined to a minimum necessary for the designated purposes to provide users with products and services.
- Ping An keeps customer information strictly confidential and does not disclose information to any external agency except in the following conditions:
    - Disclosure with the prior consent from the user;
    - Disclosure in accordance with the requirements of laws and regulations;
    - Disclosure at the request of a government department or authorities;
    - Disclosure at the request of Ping An's higher-level regulators.
- Ping An is committed to ensure the accuracy and timeliness of customer information.
- Online businesses such as websites and apps establish specific privacy policies based on their actual business circumstances and applicable laws and regulations.

Personal Information Management

Personal Information Security Management Commitment

Security is Ping An's primary requirement for personal information management. To achieve data security commitment, Ping An adopted various security technologies and management systems to ensure that customers' personal information will not be leaked, damaged, misused, inappropriately altered, inappropriately accessed or disclosed. Ping An is in compliance with all regulatory requirements regarding the protection of personal information.

Principles of Personal Information Collection

Ping An collects information under the principles of lawfulness, legitimacy, and necessity. It informs users of the purpose of collection and usage of data and ensures that the consent and authorization of users have been obtained through signing agreement. Personal information authorized by users and the information generated by the service are only used for the designated purposes permitted by the agreement with and consent of the user.

Personal Information Collection Types

Person information collected by Ping An mainly includes the following categories:

Personal Information: refers to various information related to an identified or identifiable natural person recorded electronically or by other mean including the natural person's name, gender, residential address, date of birth, ID number, fingerprints, occupation, etc., excluding anonymized information.

Sensitive Personal Information: refers to personal information that once leaked or illegally used, may easily lead to the infringement of the personal dignity of a natural person or may endanger his personal safety or property, including information such as biometrics, religious belief, specific identity, medical health status, financial accounts, and the person's whereabouts, as well as the personal information of a minor under the age of 14.

When the relevant departments introduce laws and regulations to change the definition of the type of personal information, the scope stipulated in the latest laws and regulations shall prevail.

External Use of Personal Information

Ping An and its partners keep customer information strictly confidential. Unless it is necessary and fully authorized to provide services, or required by law, Ping An does not rent, sell, provide, share, or transfer personal information to any company, organization, or individual. Otherwise, Ping An informs users of the purpose, the type of data and obtain their consent. If we need to provide the personal information to a third party to proceed, we must inform the individual of the name and contact means of the third party, the processing purpose, the processing method, and the type of personal information, and obtain the individual's approval. If we change the original processing purpose and processing method, we must re-obtain the individual's approval in accordance with the provisions of this Policy, accurately record the use and storage of such information and help users to understand the recipient's treatment of personal information, such as storage and use.

Storage of Personal Information

Ping An only retains users' personal information for the necessary period required to achieve the purpose of personal information collection, unless otherwise specified by laws and regulations. Ping An also stores personal information in accordance with relevant laws and regulations in the actual business location.

The main basis for judging the storage period of personal information by Ping An is the current relevant laws and regulations (e.g., the Cybersecurity Law of the People Republic of China requires that network logs be retained for no less than six months, and the E-Commerce Law of the People Republic of China requires the storage of product and service information, transaction information for a minimum of three years from the completion of the transaction, etc.). The specific operation standards are as follows:

- Personal information related to the performance of product contracts and account management: Ping An will keep users' personal information for a reasonable period after it stops being used;
- For accounts created by users: Ping An will keep the personal information of users under that account for a reasonable period after the account is cancelled;
- If there are other provisions in laws and regulations or agreements between Ping An and users, the storage period stipulated in these laws and regulations or agreements will prevail.

After the storage period expires, Ping An will delete or anonymize users' personal information in accordance with the law. If deletion is technically difficult, Ping An will stop processing activities other than storage and take necessary security measures.

If Ping An stops operating a certain business or website, Ping An will notify users 30 days in advance, stop related personal information collection activities, and delete or anonymize users' personal information within a reasonable period.

Users' Rights to Personal Information

Users have the following rights and choices in accordance with the law regarding their personal information, and Ping An fully respects these rights and choices and ensures their exercise:

Awareness and Decision

Users have the right to know and decide how Ping An handles their personal information, and they can restrict or refuse Ping An's processing of personal information, unless otherwise required by laws and regulations.

When legally allowed, Ping An may collect and use users' personal information without their consent. Where required by law, Ping An will seek users' individual consent for the processing of personal information under specific circumstance.

If users have any questions about Ping An's personal information processing rules or this policy, they can request Ping An to provide explanations through the contact information provided on various platforms and products.

Access

Users have the right to access their personal information in accordance with relevant laws and regulations.

Correction and Addition

If users find that their personal information is inaccurate or incomplete, they have the right to correct and supplement their personal information. Users can make a request to Ping An for correction or supplementation through the contact information provided by Ping An in the "Contact Ping An" section. Ping An will process the requests as soon as possible and respond within 15 days after verifying the user's identity.

Copy and Transfer

Users have the right to copy their personal information stored by Ping An, and under conditions stipulated by laws and regulations, users can also request Ping An to transfer their personal information to a personal information processor designated by the user, and Ping An will provide a path for the transfer in accordance with the law.

Change of Authorization Scope

Users can change or revoke the scope of Ping An's authorization to collect and process their personal information.

After users make the change, Ping An will not be able to continue providing services corresponding to the authorization, but this will not affect personal information processing activities based on the user's authorization that occurred prior to the change.

Deletion

Users have the right to request Ping An to delete their personal information, or they can request the deletion of their personal information by applying for account cancellation, thereby deleting their personal information. Users can make a request to Ping An for the deletion of their personal information through the contact information provided by Ping An in the "Contact Ping An" section. Ping An will process the request as soon as possible and respond within 15 days after verifying the user's identity.

The exercise of the right to delete is not absolute and is only applicable in statutory circumstances. Users have the right to request Ping An to delete their personal information. Additionally, due to statutory retention periods or technical limitations, Ping An may find it difficult to delete certain personal information. However, Ping An can cease all processing activities beyond storage and implement necessary security measures. For details on the storage of personal information, please refer to the "Storage of Personal Information" section of this policy.

Account Deletion

Users can request the deletion of their personal account. Before the account is deleted, Ping An verifies the user's personal identity, security status, device information and other information. After verification, Ping An will unlink the user's account from the Ping An official website. After the account is deleted, all information associated with that account will be deleted or anonymized, except where otherwise required by law. Please note that account deletion is irreversible, so users should choose this option carefully.

Protection of Deceased Users' Personal Information

In the unfortunate event of a user's death, for the legitimate and proper interests of the deceased user, their close relatives can request Ping An to provide access to, copy, correct, or delete the deceased user's relevant personal information, provided they submit the necessary supporting documents. This is unless the deceased user made other arrangements during their lifetime.

Responding to User Requests

Ping An fully respects users' rights regarding their personal information and actively responds to users' exercise of these rights.

For reasonable requests from users, Ping An generally does not charge fees. For requests that are made multiple times, repeated, or exceed reasonable limits, Ping An may change certain fees at this discretion. If the request includes personal information of other users, exceeds reasonable limits, requires excessive technical effort (e.g., requiring the development of new systems or fundamental changes to existing practices), may infringe on the rights of others, is not practical, or if Ping An has other legitimate reasons, Ping An may refuse to respond and provide explanations.

Ping An will process user requests as soon as possible and respond within 15 days after verifying the user's identity. If a user is unsatisfied with the response, especially if they believe Ping An's handling of their personal information has harmed their legal rights, they can file a complaint to regulatory authorities or initiate legal proceedings.

Ping An's various products and services provide channels for users to access and manage their personal information and exercise their right, including queries, modifications, communications, and complaints. Any revisions or updates to the privacy policy will be promptly communicated to users and their consent will be obtained.

Other Information Channels

Users may also access all of Ping An's websites through other non-Ping An websites. Ping An advises users to review the personal information protection policies of such websites to understand how they handle personal information. These websites are independently responsible for collecting, using, storing, sharing, transferring, and disclosing personal information.

This personal information protection policy does not apply to third-party services or products accessed through Ping An services/products. For specific provisions, please refer to the privacy policy or similar statements of the third party.

Security of Personal Information

Ping An places a high priority on the security of users' personal information and employs various reasonable security measures that comply with laws and regulations and industry standards to protect user personal information and prevent security incidents such as leakage, damage, loss, and tampering.

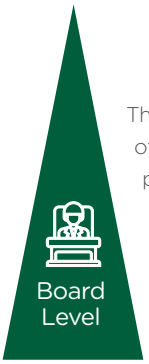
In the design phase of products and services, Ping An considers and implements user privacy protection. Throughout the product lifecycle, including data collection, transmission, storage, use, and disposal, data compliance management tasks are subdivided into corresponding management activities, agreements, and technical implementations to ensure the practical implementation of data compliance management frameworks.

As part of its ongoing commitment to privacy protection, Ping An conducts regular Privacy Impact Assessments (PIA) for Ping An's products and services. During the PIA, Ping An assesses privacy risks related to Ping An's products and services in countries or regions where Ping An operates. Ping An has a trained legal team specializing in privacy laws to identify and manage privacy risks, minimize potential impacts on individual rights and address any other privacy concerns. Ping An conducts strict audits on personal privacy information management approach and protecting mechanisms to evaluate the effectiveness of privacy protection measures.

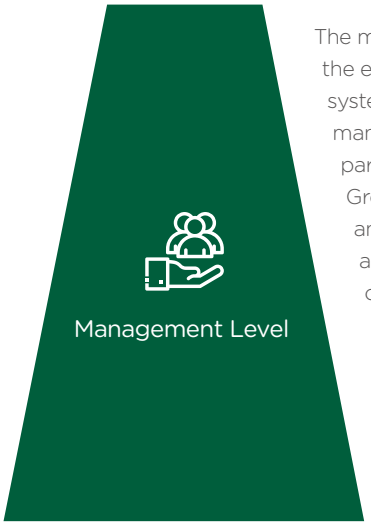
Furthermore, Ping An continues to enhance the technical development and exchange of personal information protection.

Privacy Protection Management Framework

Ping An has established a three-tier privacy protection management structure covering "board level, management level, execution level".



The Board level is responsible for the top-level design and overall planning of customer privacy and information protection, based on national strategic planning and Group overall policies, establishing the Group's customer privacy protection strategy, scientifically formulating, and promoting the overall implementation deployment of the strategy. The Board receive annual report on Ping An's privacy protection management work.



The management level is responsible for guiding and promoting the establishment of customer privacy and information protection system, incorporating the privacy protection system into the risk management process, and clarifying the responsibilities of various parties in customer privacy and information protection work. The Group's Privacy Protection Team is responsible for customer privacy and personal information protection work. The management level also promotes the establishment of collaborative mechanisms, conducts decision review on major privacy management issues, and guides and supervises implementation. Through regular meetings, the management mechanisms and work plans are reviewed, organizational management systems and requirements are developed, supervision, accountability, and incentive management are carried out to ensure the effective implementation of management strategies, systems, processes, and measures.

Each department of executive level implements specific plans for customer privacy and information protection in accordance with the Group's strategies and regulatory requirements, leads the organization to implement the customer privacy and information protection system, carries out daily management and protection work, coordinates various parties to effectively carry out privacy protection work, implements operational management mechanisms, implements privacy protection-related processes in daily business operations, and ensures the legal and compliant collection, storage, use, processing, transmission, provision, and disclosure of relevant data.

Management Measures

Ping An has put in place policies, organizational structures, and management personnel related to personal information security. Ping An strictly limits the scope of personnel authorized to access personal information and requires them to comply with confidentiality obligations. We adopt a zero-tolerance principle for personal privacy violations. Ping An conducts training on privacy security, personal information protection and security for all employees and third-party personnel every year, and holds regular privacy awareness communications to employees to enhance their awareness and capabilities in personal information protection.

Technical Measures

In terms of data transmission, Ping An uses encryption technology to enhance the security of personal information. Data exchanged between the user's App or browser and the server is protected by SSL protocol encryption. Ping An provides secure browsing using the HTTPS protocol. In addition, Ping An takes security protection measures such as data desensitization and file watermarking for sensitive data. Ping An employs trusted protection mechanisms to prevent personal information from malicious attacks.

Security Incident Response

Ping An has established a security situation awareness platform that plays a vital role in establishing and implementing a security operation mechanism for threat pre-warning, in-event security response, and post-event security handling. Ping An conducts threat monitoring, continually monitors industry network and data security events, and external threat warnings, enabling proactive prediction and prevention of security risks, continuous intelligent monitoring, and automated security response.

Ping An has also established emergency plans for personal information security incidents and a data security drill outline. At least one security drill is conducted each year. In the event of, or potential for, personal information leakage, tampering, loss, or other security incidents, Ping An will immediately initiate the emergency plan and take remedial measures to minimize the impact of the security event. At the same time, Ping An will inform users of the security event's causes, consequences, types of personal information affected, and remedial measures through reasonable and effective means such as email, notifications, and announcements, in accordance with the law. Ping An will also report relevant information about the security event to the relevant regulatory authorities as required by law. Employees of Ping An who violate this policy and relevant management regulations on privacy and security shall be subject to disciplinary action in accordance with the company's relevant reward and punishment provisions.

Personal Information Protection of Minors

Ping An attaches great importance to the protection of personal information of minors. For users under the age of 14, written consent of their parents or legal guardians should be obtained before using Ping An's products and services. Ping An protects the confidentiality and security of personal information of minors in accordance with relevant national laws and regulations.

Ping An respects and protects the privacy rights of all customers, and strictly implements internal regulatory documents based on the actual circumstances. Ping An will on a timely basis revise the privacy protection regulations according to national law and regulation updates to fulfil corporate social responsibility and achieve sustainable development.

Policy Update

To reflect in a timely manner the latest developments in government regulations, laws, personal data management technology, regulatory requirements, and company operations, this statement should be reviewed at least once a year to ensure the effectiveness of personal data management.