

Compliance Manual for Medical Insurance Business For Sun Flower Insurance Brokers Limited

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Sales Process

- 1) After launching any medical insurance product (i.e. making a medical insurance product available for purchase by customers), Sun Flower Insurance Brokers Limited shall monitor the processes to ensure customers are treated fairly during the selling process by the following approaches and steps:
 - 1.1. Sun Flower Insurance Brokers Limited shall assess the insurance needs of customers and recommend suitable medical insurance products to them to ensure clients being treated fairly in the process.
 - 1.2. Sun Flower Insurance Brokers Limited shall ensure that product information is communicated to customers before and at the point of sale in a clear and fair manner and in a way that is not misleading.
 - 1.3. Sun Flower Insurance Brokers Limited shall ensure that a clear explanation of the key features and terms and conditions of medical insurance policies is provided to customers in plain language for their easy understanding including:
 - (a) Coverage under the policy;
 - (b) Key or unusual exclusions (e.g. pre-existing conditions, specific medical procedures, etc.);
 - (c) Benefits and features including healthcare provider networks;
 - (d) Potential increase in premiums, factors leading to such increase, frequency and timing of premium adjustment and/or potential changes to benefits or other policy terms at renewal;
 - (e) implication on pre-existing conditions and other implications when switching from one policy of an insurer to another including switching from a group plan to an individual plan and from a non-VHIS-compliant policy to a VHIS-compliant policy;
 - (f) any requirement for obtaining pre-approval from insurers before receiving medical consultations or treatments;
 - (g) procedures for making claims and terminating policies;
 - (h) requirement to make full disclosure in response to an insurer's questions and the consequences of not making full disclosure;
 - (i) limits of indemnity for benefits, "Reasonable and Customary" clause, amounts of excesses, deductibles, retentions, coinsurance or other policy/benefits limits and how these features will be applied; and

(j) other significant insurance clauses (e.g. double insurance, medically necessary and termination clause), if any.

Offering of Gifts to Customers

1. Sun Flower Insurance Brokers Limited will not directly or indirectly offer Gifts to individual customers when marketing, promoting or distributing medical insurance products, unless the gifts, according to a reasonable assessment made by the authorized insurer or by Sun Flower Insurance Brokers Limited, the Gift would not distract the customer from making an informed decision on whether or not to purchase the medical insurance product after taking account of all the circumstances in which the Gift is proposed to be offered or made (including the value of the Gift relative to the amount of premium payable by the customer in relation to the product and the manner in which the Gift is to be marketed or offered). This assessment may be made either on a case-by-case basis or, if Gifts are to be offered or made as part of a marketing campaign or programme, at the time the marketing campaign or programme is formulated.
2. As an exception to the above, Sun Flower Insurance Brokers Limited may offer Permitted Gifts as allowed under the Annex of Guideline 31 of the Insurance Authority in relation to Permitted Gift.

Premium Rebates and Commission Rebates

1. Sun Flower Insurance Brokers Limited will not allow rebates of premiums or commissions to customers in relation to medical insurance products.
2. Sun Flower Insurance Brokers Limited shall also:
 - (a) ensure that persons (including staff) who carry on regulated activities in relation to the insurer's medical insurance business, shall comply with the statutory licensing requirements (i.e. if they carry on regulated activities they should either be licensed or fall within one of the exemptions stated in the Ordinance);
 - (b) ensure that Sun Flower Insurance Brokers Limited staff, licensed technical representatives (agent) have the knowledge and skills in relation to the medical insurance products in order to provide quality and timely advice to customers; and
 - (c) provide quality and ongoing training on medical insurance business and product features to such persons as referenced the above.



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After-sales Service

1. As part of the after-sales service, upon a policy holder's request, ABC shall review the continued suitability of the medical insurance policy/policies in meeting policy holder's needs and provide such review to the policy holder making the request.
2. Where significant changes are to be made to the features and terms and conditions including but not limited to
 - a) premiums,
 - b) benefits,
 - c) new exclusions etc.of medical insurance policies at renewal or while the policies are in effect (if changes can be made while such policies are in effect), upon advance written notice from the Insurer, ABC shall inform the policy holders of such changes prior to the renewal date of the policy or the date on which such changes become effective.
3. Sun Flower Insurance Brokers Limited will properly address any follow-up queries which customers have arising from the changes.
4. Should a policy holder make an enquiry on the eligibility of a claim and reimbursement limit according to the terms and conditions of his/her medical insurance policy before he/she undergoes a treatment or procedure, Sun Flower Insurance Brokers Limited shall provide timely and suitable advice to the policy holder.

Complaints Handling

1. Sun Flower Insurance Brokers shall, upon customers' requests, provide them with information on complaints handling, including:
 - a) the channels (e.g. complaint hotlines and the contact details of the Insurance Complaints Bureau), and
 - b) procedures for making complaints.

Sun Flower Insurance Brokers will display such information on the company website.

2. Sun Flower Insurance Brokers shall:
 - (i) have formal complaints handling policies and procedures to ensure that complaints are handled fairly, effectively and promptly;
 - (ii) set service standards for complaints handling;
 - (iii) review the complaints properly;



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- (iv) properly address any problems identified in the process of handling complaints;
- (v) provide their findings, complaint assessment reports, any other relevant information and/or remedial actions to the IA and other relevant regulatory authorities (where applicable) upon request; and
- (vi) have policies or guidelines which set out clearly the circumstances under which complaints should be escalated to ABC's Responsible Officer.

Proper Handling of Customers' Personal Data

1. Sun Flower Insurance Brokers Limited shall, at all times, exercise due care and diligence in collecting, handling, storing, using, transferring and erasing customers' personal data.
2. Sun Flower Insurance Brokers Limited shall comply with the Personal Data (Privacy) Ordinance (Cap. 486), the Guidance on the Proper Handling of Customers' Personal Data for the Insurance Industry issued by the Office of the Privacy Commissioner for Personal Data ("OPC") or any relevant rules, codes, circulars and guidance issued by the OPC from time to time.