



Republic of the Philippines
Department of Finance
INSURANCE COMMISSION
1071 United Nations Avenue
Manila



Insurance Commission Ruling (ICR) No.:	2021-04
Date:	06 August 2021

MR. ANTONIO G. DE ROSAS
President and CEO
Pru Life Insurance Corporation of U.K.
9/F Uptown Place Tower 1,
1 East 11th Drive, Uptown Bonifacio,
1634 Taguig City

Subject: **Sale of e-vouchers on Shopee, Lazada, and other online-selling platforms**

Dear **Mr. de Rosas**:

This refers to your letter dated 09 June 2021 informing the Insurance Commission that Pru Life Insurance Corporation of U.K. (Pru Life UK) will be selling e-vouchers for individual life insurance on Shopee, Lazada, and other online-selling platforms ("Platforms"). Per your letter, the e-vouchers shall operate as follows:

"The e-vouchers, which may be purchased by users of the Platforms ("User" or "Users"), will be used as a digital payment method. x x x

The customer journey for the Platform will be as follows:

- 1) User logs in to the Platform.
- 2) User searches the insurance e-voucher.
- 3) User buys an e-voucher from the Platform. User may keep the voucher for their own use or gift the same to other persons.
- 4) The bearer of the e-voucher ("Bearer") goes to Pru Life UK's PRUShoppe microsite (<https://www.activate.prushoppe.com/>), where the e-voucher will be redeemed and used as payment for the policy. The insurance application process will be completed entirely in the microsite.
- 5) Upon successful redemption, the Bearer will receive the issued policy and related documents via their registered email address.

If for any reason, it is found that the Bearer is not eligible for the

individual insurance purchased in the microsite, then the Bearer will receive a notification to that effect, and the premiums paid via e-voucher will be refunded to him. In addition, should the User fail to redeem the voucher within the period specified in the product description, the e-voucher value will be refunded to the User.

In the Platforms, Users will be informed that the e-vouchers availed of will enable them to purchase individual insurance products through Pru Life UK's microsite. The product descriptions for the individual insurance products as well as other details, such how to access the Pru Life UK microsite, voucher validity, and refund guidelines, will also be clearly specified."

Upon careful consideration of the mechanics of your intended selling of e-vouchers, the Commission interposes no objection to the same.

As described in your letter, the subject e-vouchers are akin to electronic gifts, which are among the types of digital payments expressly recognized under Circular Letter No. 2020-70 dated 11 June 2020 on the "Recognition of Digital Payments As An Integral Part of Insurance Technology (InsurTech), Providing for Its Framework, and Encouraging Its Adoption in Insurance Transactions". Section 4(g) of CL 2020-70 defines "electronic gifts" as follows:

"SECTION 4. TYPES OF DIGITAL PAYMENTS.

x x x

- g. **Electronic Gifts.** An electronic gift certificate that can be transferred from one person to another. The receiver can spend these gifts in any partner online products/services provider."

In view of the foregoing, Pru Life UK may sell e-vouchers on Shopee, Lazada, and other online-selling platforms, provided that such sale does not amount to discounting or rebating, in accordance with Section 370 of the Insurance Code, as amended. Hence, the value of the subject e-vouchers must be the peso equivalent of the amount paid by the user for the same.

Finally, Pru Life UK is enjoined to ensure compliance with Sections 5 to 9 of CL 2020-70, as well as other pertinent laws, rules and regulations implemented by other government regulatory agencies.

For your guidance.

Very truly yours,

DENNIS B. FUNA
Insurance Commissioner

