



Legal Opinion	2023-10
Date:	27 March 2023

MR. GORDON ALAN P. JOSEPH
 President & Chief Executive Officer
**PHILPACIFIC INSURANCE BROKERS
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Attention: **Atty. Rizza Marie G. Mangubat-Gariando**
 Corporate Secretary

Subject: **Request for Legal Opinion on a Potential
 Collaboration between a Licensed Insurance Broker
 and Tech Co/TelCo**

Dear **Mr. Joseph:**

This refers to Philinsure’s letter dated 08 February 2023 requesting for legal opinion of and guidance from the Insurance Commission (the “IC”/Commission) on the viability of a potential collaboration of Philinsure and a Technology Company (“Tech Co/Tel Co”) with certain arrangements with the latter to act as the master policy holder and as a collection and payment facility administrator for the corporate/enterprise customers and individual subscribers of the Tech Co/Tel Co.

As stated in your letter, Philinsure particularly seeks the IC’s opinion on the following:

1. For insurance policies for corporate/enterprise customers, can Tech Co/Tel Co act as group master policyholder over an affinity group of insured enterprise customers in order to be allowed to facilitate the collection of premiums?
2. As an option to the Tech Co/Tel Co, is it allowed to facilitate the collection of premiums using its self-service portals and billing system without being a master policy holder?