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For customers/prospects/beneficiaries/sufferers

## Privacy Notice

Ergo Insurance (Thailand) Public Company Limited (“**Company**” or “**we**”) is highly aware of the importance of your privacy rights and strictly adheres to the protection of personal data. Therefore, we have established this Privacy Notice to comply with the Personal Data Protection Act B.E. 2562 (2019), as well as the relevant subordinate legislation and any other laws related to the protection of personal data, both currently in effect and those that may be amended or modified in the future (collectively referred to as the “**Personal Data Protection Law**”).

This Privacy Notice applies to the collection, use, and disclosure (collectively referred to as “**Processing**”) of your personal data if you are a customer, prospect, beneficiary, person entitled to claim under an insurance contract, injured individual, sufferer, or a third party entitled to claim compensation from the Company.

Additionally, this Privacy Notice explains the methods we use to collect your personal data, the purposes of Processing, the retention period of personal data, and your various rights as a data subject. We will only collect your personal data as necessary for the purposes we have notified you. If the Personal Data Protection Law requires that Processing of your personal data be done with your consent, we will request your consent first. For more details, please see below:

### 1. What are channels for our personal data collection?

We may collect your personal data via the following channels.

- 1.1. **In the case where you give your personal data directly to us or through our agent/broker or through our website or any other electronic channels**
- When you wish to purchase our non-life insurance, products and/or other services.
  - When you submit the application for non-life insurance, request for our services and/or any documents for purchasing our non-life insurance, products and/or other services, or when you provide the information while you are considering purchasing our non-life insurance, products and/or various services.
  - When you communicate with us, whether in written form, verbally, by telephone, or electronically, regardless of who initiated the contact.
  - When you contact us, our agents, our insurance brokers, our personnel/employees through direct meetings, interviews, websites, applications, social media, telephone, email, short messages service (SMS), fax, mail, or any other method.

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- When you contact us to claim compensation or damages under an insurance policy or guarantee insurance contract.
  - When you make a claim or request that we contact you back to fulfill your request, such as requesting information, filing a complaint, or for other purposes.
  - When you request any amendments, changes, or updates to any details relating to the non-life insurance or products you have purchased, or the services you use from us.
  - When you participate in marketing activities, lucky draws, surveys, or events organized by or on behalf of us and/or our personnel and partners.
- 1.2. **In the case where we receive your personal data from third parties**
- When our business partners or alliances provide your personal data to us for the purpose of offering and/or providing services to you, and for the benefit of conducting related business.
  - We may collect your personal data from our business partners or alliances, public sources, or commercial data sources, including but not limited to data providers, medical sources, public health facilities, hospitals, physicians, healthcare professionals, other insurance businesses, associations or federations of businesses related to the products you purchase or services you use, government agencies such as the Office of Insurance Commission (OIC), or sources that can be accessed online or through various social media. We may use your personal data for the purpose of offering and/or providing services to you, and for the benefit of conducting related business.
- 1.3. **In the case where we collect your personal data automatically**
- When you visit and/or use our website, applications, or various online services where cookies or similar technologies are applied (for more details, please find the Cookies Policy at [www.ergo.co.th](http://www.ergo.co.th)).
  - When you use our services or contact us at our business premises where CCTV cameras are installed to record still and moving images (for more details, please find Privacy Notice for CCTV at [www.ergo.co.th](http://www.ergo.co.th)).

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**2. What personal data do we collect?**

We will collect personal data that can identify you, whether it is personal data you provide to us directly or through our agents or brokers, personal data you provide through our website or other electronic channels, personal data we collect from you automatically, or personal data we receive from third parties. This will include the following personal data:

- 2.1. **Personal information** For example, Name, surname, address, telephone number, email, contact details, ID card no., Passport no., official identification card number, driving license number, vehicle registration number, date of birth, age, gender, height, weight, occupation, job title, type of work, hobbies, recreational activities, photograph, signature, nationality, religion, marital status, family member information.
- 2.2. **Health information** For example, Chronic diseases, disabilities, impairments, physical abnormalities, medical history, diagnostic history, details of medical services received, medical reports, medical investigations, consultation history, laboratory test results, autopsy reports, smoking behavior, alcohol consumption behavior, exercise behavior, sleep behavior, lifestyle and dietary habits, or any other information that indicates your health status.
- 2.3. **Financial information** For example, Income, source of income, salary, wages, bank account number, account statement, financial status, credit/debit card number, credit/debit card usage information, credit card or personal loan history, loan details and expenses, payment details or information.
- 2.4. **Travel information** For example, Flight number, flight date and time, airline, and other travel information and details.
- 2.5. **Information about products and/or services you have previously purchased from us or from other insurance business operators.** For example, Policy number, sum insured, premium amount, changes or transactions related to the policy, premium payment method, premium payment history, history of rejected insurance applications or loan history, beneficiaries, claims, and the exercise of rights under the policy or any other products or

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services offered by us or other insurance business operators.

- 2.6. **Technical information** For example, Access data for our website, applications and various systems, computer traffic data (Log), usage logs including device identifiers, IP Address of computers, device identification numbers, device types, mobile network data, connection information, geographical location data, types of browsers, system access logs, data on websites accessed by users before and after (Referring Website), system usage history logs, login records (Login Log), transaction records (Transaction Log), usage behavior (Customer Behavior), system access statistics, time spent visiting the system (Access Time), information you search for, use of various functions in the system, and data we have collected through cookies or other similar technologies.
- 2.7. **The status of being a person with legal restrictions.** For example, Information regarding the status for compliance with the Foreign Account Tax Compliance Act (FACTA) of the United States, the status as a person defined under the laws against money laundering and the laws against financial support for terrorism and the proliferation of weapons of mass destruction, the status of being a bankrupt person.
- 2.8. **Information regarding the history of legal proceedings.** For example, Criminal history, records related to legal proceedings, whether civil, criminal, administrative, or other types of litigation, including police reports and related court orders.
- 2.9. **Other information** For example, Behavior or trends in purchasing goods and/or services, still and moving images captured by surveillance cameras (CCTV), recorded audio of conversations.

In conducting our non-life insurance business, it is essential for us to collect your Sensitive Personal Data, such as various health-related information as mentioned above, as this information is necessary for evaluating insurance coverage, as well as for processing claims or providing other services to you. In this regard, we will collect, use and disclose such Sensitive Personal Data only when required or permitted by law, or when we have obtained your explicit consent.

In the case where we need to collect your Sensitive Personal Data and the law requires us to obtain your consent, you have the right to refuse to give us consent for the collection, use or disclosure of your Sensitive Personal Data. However, if you choose not to give us consent to the collection of such Sensitive Personal Data, it may be an obstacle to our ability to conduct

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transactions between us and you, or to provide our services to you, or to respond to other requests you may have. For example, we may not be able to enter into an insurance contract with you, or we may not be able to, wholly or partly, provide our services to you.

Furthermore, in the case where we have collected your personal data before the Personal Data Protection Act B.E.2562 (2019) came into effect, we will continue to collect and use your personal data for the original purposes for which it was collected. In this regard, if we rely on the consent basis for the collection and use of your personal data, and you do not wish for us to continue collecting and using your personal data, you have the right to withdraw your consent by informing us of your wishes through the contact details provided in Article 9 (How to Contact Us) below.

**3. We collect, use, and disclose your personal data for what purposes?**

3.1. We process your personal data for the following purposes (the “**Specified Purposes**”)

- (a) To present or sell our insurance products and/or services.
- (b) To evaluate insurance coverage or enter into contract with you, or to fulfill our obligations under the contracts we have with you.
- (c) To comply with the procedures related to the services or products we provide, including but not limited to evaluating your financial information and recommending suitable products and services to you, processing applications for insurance products, managing the products you purchase, collecting premiums and outstanding payments from you, investigating, analyzing, processing, proceeding with policy surrender, and paying claims, paying benefits under your policy and the renewal, modification, and cancellation of your policy, conducting audits related to claims, as well as exercising any rights under your policy, including the subrogation rights and the rights that have been substituted by subrogation (if any).
- (d) To process your payments for our products and/or services and any related actions, including but not limited to confirming payment amounts, collecting fees for products or services, debiting from bank accounts, sending information to banks or credit or debit card providers, and issuing receipts, and so on.
- (e) To examine the facts about you or to prove or verify your identity before entering into any contract or transaction with you.
- (f) To facilitate communication between us and you, including conveying information regarding management and other details about any products or accounts you may have with us, providing technical support related to our website and applications, or communicating about any future changes to this Privacy Notice.
- (g) To send you news related to our products and services, marketing activities, or other events, including promotional messages that you may find interesting or beneficial.

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- (h) To reinsure with reinsurers.
- (i) To design our new products and/or services or to further improve our current products and/or services.
- (j) To conduct market research, in-depth data analysis, statistical or actuarial science research, financial reporting or evaluations prepared by us, our personnel and partners, or regulatory agencies related to us.
- (k) To investigate or examine the actions related to fraud, concealment of true statements, and other offenses, whether actual offenses or actions suspected of being offenses.
- (l) To allow you to access content on the website, applications or social media platforms, or to any specific service.
- (m) To monitor your website, applications, or social media platform usage behaviors for the analysis of your usage of the website, applications or social media platforms, and to understand the manner of usage you are interested in, or to make those websites, applications or social media platforms respond to your specific interests, for the evaluation, operation, and improvement of those websites, applications or social media platforms, or our products and/or services, to address various issues, to recommend related products and/or services, and to target advertisements on the website, applications and other channels based on the target audience.
- (n) To audit our business, whether through internal audits or external audits.
- (o) To ensure compliance with the provisions of the internal policies that we adhere to.
- (p) To comply with the applicable laws related to our business, such as laws on non-life insurance, laws on anti-money laundering, tax laws, personal data protection laws, and laws concerning computer-related offenses.
- (q) To comply with lawful orders from relevant government agencies and officials.
- (r) To collect, use, and/or disclose personal data to the Office of the Insurance Commission (OIC) for the purpose of supervising and promoting the insurance business under the law on Insurance Commission and Promotion and the law on Non-Life Insurance laws. The OIC may also disclose your personal data to other government agencies to prevent violations or non-compliance with the law. The details of the collection, use, and disclosure of personal data by the OIC are outlined in the OIC's privacy notice, which can be viewed on the website <http://www.oic.or.th>.
- (s) For establishment, compliance, exercise or defense of legal claims.

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- (t) To maintain order, examine and investigate incidents related to safety, such as the incursion at the Company's premises, building or area, the unauthorized access to areas, theft, fires, various crimes, and to ensure the security and safety of our personnel and external individuals at our business location, as well as our assets and information.
- (u) For the purpose of testing internal systems or testing the Company database.
- (v) To receive complaints and feedback from you regarding our products and/or services, for the development of the quality of our products and services.
- (w) For other necessary operations in the conduct of business, and that may benefit you or are directly related to any of the aforementioned Specified Purposes.
- (x) For other purposes that we notify you of at the time we collect your personal data.

3.2 In this regard, we will process your personal data in accordance with the aforementioned Specified Purposes under the following lawful basis.

- (a) It is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract;
- (b) It is necessary for compliance with a law to which we are subjected;
- (c) It is necessary for our legitimate interests or any other persons or juristic persons other than us;
- (d) It is necessary for the performance of a task carried out in the public interest by us, or it is necessary for the exercising of official authority vested in us;
- (e) It is necessary for establishment, compliance, exercise or defense of legal claims;
- (f) It is to prevent or suppress danger to life, body or health of the person;
- (g) It is to achieve the purposes regarding research or statistic research where suitable measures have been provided to safeguard your rights and freedom;
- (h) It is necessary to comply with the law to achieve the purposes regarding essential public interest on the basis that there is a provision of suitable measures to protect your fundamental rights and interest; or
- (i) The consent you have given to us when none of the aforementioned exceptions or lawful bases apply.

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- 3.3. Since some of your personal data is information that we need to process in order to comply with the law or under an insurance contract, or to enter into an insurance contract with you, if you do not provide such personal data to us, there may be legal implications, or we may not be able to fulfill our obligations under the insurance contract we have with you, or we may not be able to enter into an insurance contract with you. Additionally, we may not be able to offer various services related to our products or services, including services related to your claims (as the case may be).

In such cases, we may need to decline entering into an insurance contract with you or cancel the services related to you, whether in whole or in part.

- 3.4. In the event that we need to process your personal data for purposes other than the Specified Purposes, we will provide an additional privacy notice or data protection notice and/or send you a letter to explain the processing of your personal data in that manner. In this regard, you should review any additional policies or notices related to this along with this Privacy Notice.

**4. Who do we disclose the personal data to?**

- 4.1. Subject to the Specified Purposes and the criteria required by law, we may disclose your personal data to the following persons and agencies.
- (a) Non-life insurance agents, non-life insurance brokers, or any person authorized to act on our behalf in order to invite, persuade, direct, manage, offer for sale, sell, distribute, or provide services related to the products and/or services we offer to you, including delivering our products and/or services that have been offered or sold to you.
  - (b) Policyholders in the case of group insurance.
  - (c) Reinsurers in order to manage our risks through reinsurance.
  - (d) Alliances, business partners, service providers, and personal data processors that we assign or hire to manage and/or process personal data for the benefit of our business operations, such as payment services, mail and parcel services, printing services, information technology services, website services, data archiving services, data analysis services, research services, marketing services, travel services, healthcare services, roadside emergency assistance services, medical emergency assistance services, home assistance services, personal assistant services, disaster surveying and damage valuation services, automobile accident surveying services, vehicle inspection services for insurance, vehicle towing services, service for receiving claims and disbursing compensation or funds, car insurance system services, or any other services that may benefit you or be related to our business operations.
  - (e) Thai General Insurance Association, associations or federations in the insurance business sector, and other insurance businesses.

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- (f) Government agencies with the authority to regulate under the law, or that request the disclosure of personal data based on legal authority, or that are involved in legal processes, or that are authorized under relevant laws, such as the Office of the Insurance Commission (OIC), the Anti-Money Laundering Office, the Bank of Thailand, the National Anti-Corruption Commission, the Revenue Department, the Office of the Personal Data Protection Commission, the Royal Thai Police, the Office of the Attorney General, and the Court.
  - (g) Our consultants, such as doctors, auditors, legal advisors, lawyers, or other experts.
  - (h) Individuals engaging in transactions or intending to engage in transactions with us, where your personal data may be part of the purchase or sale, or part of the offering for the purchase or sale of our business (if applicable).
  - (i) Individuals or other entities who are authorized under relevant laws.
  - (j) Individuals or other entities to whom you have consented to disclose your personal data.
- 4.2. When disclosing your personal data to others, we will implement appropriate measures to protect the disclosed personal data and to comply with the standards and obligations for personal data protection as required by the Personal Data Protection Law. If we send or transfer your personal data to a foreign country, we will ensure that the destination country, international organization, or foreign recipient has adequate personal data protection standards or complies with the criteria set by the Personal Data Protection Law, unless exempted by the Personal Data Protection Law. Additionally, in certain cases, we may request your consent for sending or transferring your personal data to a foreign country.
- 4.3. In this regard, when disclosing your personal data to others, we will act solely under the Specified Purposes or other purposes permitted by law. In the case where the law requires your consent, we will obtain your consent beforehand.

**5 Duration of Personal Data Retention**

- 5.1. We will retain your personal data for the duration necessary to achieve the Specified Purposes for processing such personal data. The retention period for personal data will vary depending on the Specified Purposes for Processing that personal data and considering the following factors:
- (a) the duration required by relevant laws (if any);
  - (b) the legal statute of limitations for potential claims arising from or related to the personal data we process.
  - (c) our practices, the non-life insurance sector, and the relevant sectors for each type of personal data.

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5.2. In this regard, we will retain your personal data for no longer than 10 years from the date the transaction or legal relationship between you and us ends. However, we may retain your personal data for longer than this period if permitted by law or if such retention is necessary to establish our legal claims.

6. **Personal Data of a Minor**

We may periodically collect and process the personal data of minors who have not reached legal age. In such cases, we will comply with the relevant Personal Data Protection Law pertaining to the processing of personal data of such individuals, including obtaining consent from a legitimate representative or guardian, as required by Personal Data Protection Law.

7. **Your rights regarding personal data**

As a data subject, you have following various rights regarding your personal data, under the criteria, methods and conditions stipulated by the Personal Data Protection Law.

- 7.1. **Right to Access** You are entitled to access your personal data and request us to make a copy of such personal data for you, or to request the disclosure of the acquisition of such personal data obtained without your consent as stipulated by Personal Data Protection Law.
- 7.2. **Right to Data Portability** You are entitled to receive the personal data concerning you, and to request us to send or transfer your personal data to other data controller or you, unless it is impossible to do so because of the circumstances, as stipulated by Personal Data Protection Law.
- 7.3. **Right to Object** You are entitled to object the Processing of your personal data as stipulated by Personal Data Protection Law.
- 7.4. **Right to Erasure** You are entitled to request us to erase, destroy or anonymize your personal data as stipulated by Personal Data Protection Law.
- 7.5. **Right to Restrict the Processing** You are entitled to request us to restrict the Processing of your personal data as stipulated by Personal Data Protection Law.
- 7.6. **Right to Rectification** You are entitled to request us to rectify your personal data if your personal data is inaccurate, not up-to-date, incomplete or misleading.
- 7.7. **Right to Withdraw the Consent** In the event that we rely on your consent to proceed with the Processing of your personal data, you are entitled to withdraw your consent for the Processing of your personal data that you have given to us, unless there are legal or contractual restrictions on the right to withdraw consent that benefit the data subject.

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- 7.8. **Right to Lodge a Complaint** In the event that you believe that we violate or do not comply with any obligations according to the Personal Data Protection Law, you are entitled to file a complaint to the data protection regulatory agency according to the regulations and methods stipulated by Personal Data Protection Law.

If you wish to exercise your rights as stated above, you can contact us through the contact details provided in Article 9 (How to Contact Us) below, and we will proceed to review your request to exercise your rights. You may need to provide the relevant information and documents to us to support the consideration of your request. In this regard, we reserve the right to evaluate your request to exercise your rights and act in accordance with the Personal Data Protection Law.

**8. Data Security**

We have established a system for storing personal data and appropriate technical and administrative security measures to prevent your personal data from being used, disclosed, destroyed, or accessed without authorization. Additionally, this ensures that the level of security for your personal data complies with the criteria and methods stipulated under the Personal Data Protection Law and other relevant laws.

**9. How to Contact Us**

If you have any questions or concerns regarding this Privacy Notice, or if you wish to exercise your rights as stated in Article 7 above, please contact the Data Protection Officer through the details provided below.

- **Our office** 126/2 Krungthonburi Road, Banglamphulang, Klongsan, Bangkok 10600
- **Email** [dpo@ergo.co.th](mailto:dpo@ergo.co.th)
- **Telephone** 02 820 7000 or 1219

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**10. The change of this Privacy Notice**

We may occasionally make changes to this Privacy Notice to reflect any changes related to the Processing of your personal data and to comply with any changes in the Personal Data Protection Law or other relevant laws. We will notify you of any important amendments or changes to the Privacy Notice along with the updated Privacy Notice through appropriate channels. We recommend that you review the changes to this Privacy Notice from time to time.

Updated on 19<sup>th</sup> December 2025.

- signature -

(Isorasak Thesratanavong)

Chief Executive Officer