

(Translation)

For non-life insurance agent/broker

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 Non-life Insurance Agent or Non-life Insurance Broker of the Company, an Applicant to Become a Non-life Insurance Agent or Broker of the Company, or a person associated with such individuals, including a spouse and guarantor.

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. The categories or types of individuals from whom the Company collects personal data.

The Company will collect your personal data, which may be in the position of:

- (a) **Non-life Insurance Agent** which means a person delegated by the Company to solicit or procure persons to enter into non-life insurance contracts with the Company. In the case that the non-life insurance agent is a juristic person, the Company may collect, use, or disclose personal data of the directors, executives, employees, or coordinators of that juristic person.
- (b) **Non-life Insurance Broker** which means a person who, for commissions, indicates the opportunities or arranges for persons to enter into non-life insurance contracts with the Company. In the case that the non-life insurance broker is a juristic person, the Company may collect, use, or disclose personal data of the directors, executives, employees, or coordinators of that juristic person.
- (c) **Applicant to Become a Non-life Insurance Agent or Broker** which includes the directors, executives, employees, or coordinators of the juristic person applying to become a non-life insurance agent or broker.
- (d) **Person Associated with a Non-life Insurance Agent, Non-life Insurance Broker or Applicant to Become a Non-life Insurance Agent or Broker**, such as a spouse, guarantor or witness in the relevant documents, and so on.

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2. What are channels for our personal data collection?

We may collect your personal data via the following channels.

2.1. In the case where you give your personal data directly to us or through our website or any other electronic channels

- When you apply to become a Non-life Insurance Agent or Non-life Insurance Broker of the Company, including entering into non-life insurance agent or non-life insurance broker contract, service contract, guarantee contract for Non-life Insurance Agent or Non-life Insurance Broker, and/or other agreements or contracts with the Company.
- When you fill the information in, sign in and/or submit the Application to Become a Non-life Insurance Agent or Broker, application to guarantee a Non-life Insurance Agent or Non-life Insurance Broker, letter requesting cancellation of guarantee and/or any form or document relating to a Non-life Insurance Agent or Non-life Insurance Broker, including supporting documents for consideration, review or approval of the Company.
- When you communicate with us, whether in written form, verbally, by telephone, or electronically (e.g. website, applications, social media, email, short messages service (SMS), fax), regardless of who initiated the contact.
- 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 your information.
- When you participate in marketing activities, surveys, projects or any events organized by or on behalf of us and/or our personnel and partners.

2.2. In the case where we receive your personal data from third parties

- When a person who is the Applicant to Become a Non-life Insurance Agent or Broker, Non-life Insurance Agent or Non-life Insurance Broker informs or provides your personal data to the Company.
- When our business partners or affiliates provide your personal data to us.
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- 2.3. **In the case where we collect your personal data automatically**
 - We may collect your personal data from public sources, or commercial data sources, including but not limited to other insurance businesses, the general insurance association, associations or federations of businesses related to insurance, government agencies such as the Office of Insurance Commission (OIC), or sources that can be accessed online or through various social media.
 - 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).
 - 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).

3. 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:

- 3.1. **Personal information** For example, Name, surname, ID card no., official identification card number, date of birth, address, telephone number, email, contact details, age, gender, photograph, signature, nationality, ethnicity, religion, marital status, family information (e.g. spouse, occupation, job title of the spouse, workplace of the spouse, number of children).
- 3.2. **Information regarding educational background** For example, Educational background, academic results, name of educational institution.

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| 3.3. | Information regarding work experience | For example, | Occupation, position, workplace, years of service, income, non-life insurance agent license number, non-life insurance broker license number, license issue date, license expiration date, details of the affiliated organization, position in the chain of command, and the terms and conditions of being a non-life insurance agent/broker. |
| 3.4. | Information regarding work performance | For example, | Performance evaluation, awards received, history of complaints, investigation records, suspension of non-life insurance agent/broker contracts, and disciplinary actions, including audits and risk assessments. |
| 3.5. | Financial information | For example, | Income, source of income, salary, wages, bank account number, account statement, financial status, credit/debit card number, credit/debit card history, credit card usage or personal loan information, loan details and expenses. |
| 3.6. | Information regarding benefits and compensation | For example, | Details regarding your commission and/or other benefits, bank account number, social security fund information, tax information, and information of third-party beneficiaries. |
| 3.7. | Information regarding property | For example, | Details of the property used as collateral, such as the title deed number, location of the land, and area. |
| 3.8. | Information in case you are acting on behalf of a juristic person | For example, | Your information appearing in company affidavit, shareholder lists, or any other documents relating to a juristic person containing your personal data, or any other information we request from your juristic person or from you for use in entering into contracts, providing services, or any other related operations. |
| 3.9. | Information regarding the history of legal proceedings | For example, | Criminal records, records related to legal proceedings, whether civil, criminal, administrative, or other types of litigation, including police reports and related court orders. |
| 3.10. | 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 |

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(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.

- 3.11. **Other information** For example, Still and moving images captured by surveillance cameras (CCTV), recorded audio of conversations.

In the case where we need to collect your Sensitive Personal Data and the law requires us to obtain your consent, we will collect the data only upon receiving your explicit 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 transactions between us and you, or to provide our services to you, or to respond to other requests you may have.

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.

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

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

- (a) To check and verify your identity and/or the juristic person you represent.
- (b) To check the background before entering into and during the contract with you, or the juristic person you represent, and there may be a review of such details throughout the term of the contract we enter into with you, or the juristic person you represent.
- (c) To consider entering into a non-life insurance agent or non-life insurance broker contract, service contract, guarantee contract for Non-life Insurance Agent or Non-life Insurance Broker, or other contracts with you or to perform duties under the contract in which you are a contracting party with the Company.

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- (d) To manage the business of non-life insurance agents or non-life insurance brokers, including but not limited to workforce planning, benefit payments, compensation, incentive compensation calculations, proposals, rewards, performance evaluations, reporting or internal audits, data analysis, various sales competitions, communication, announcements, conducting surveys, statistics, handling complaints and issues of inappropriate conduct, or as part of the disciplinary process, legal verification of your information, work capability, any information requested by government agencies for any purpose, as well as for the operations of the corporate group, which includes but is not limited to maintaining records of agents, insurance processing, verifying references and backgrounds by any member of the corporate group or others, avoiding conflicts of interest, or preventing tendencies toward conflicts of interest, and audits by any member of the corporate group. In addition, your personal data may also be used for the purpose of complying with applicable laws and regulations, and adhering to the requirements of regulatory authorities under both domestic and international law, as the case may be.
- (e) For the purpose of promoting or encouraging competition in creating achievements or generating motivation, or to promote sales and/or the offering of our products.
- (f) 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.
- (g) To communicate between the Company and you, which includes communication of information regarding management and other information related to being a Non-life Insurance Agent or Non-life Insurance Broker, to provide technical support regarding the Company's website and applications, or communication regarding any changes that may occur to this Privacy Notice in the future.
- (h) 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 Law, and laws concerning computer-related offenses.
- (i) To comply with lawful orders from relevant government agencies and officials, such as the Office of the Insurance Commission (OIC) and the Personal Data Protection Committee.
- (j) 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 according to the OIC's privacy notice, which can be viewed on the website <http://www.oic.or.th>.
- (k) To conduct research or data analysis for the development of the quality of our products and services.

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- (l) For establishment, compliance, exercise or defense of legal claims.
- (m) 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.
- (n) 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.
- (o) For other purposes that we notify you of at the time we collect your personal data.

4.2 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;
- (i) The consent you have given to us when none of the aforementioned exceptions or lawful bases apply.

4.3. Since your personal data that we will proceed with the Processing for the Specified Purposes, which includes compliance with the law or entering into a contract with you (or the juristic person that you represent), is the information necessary for the accomplishment of such purposes, 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. In such cases, we may need to decline entering into an insurance contract with you.

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4.4. 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.

5. Who do we disclose the personal data to?

5.1. Subject to the Specified Purposes and the criteria required by law, we may disclose your personal data to the following persons and agencies.

- (a) Individuals engaging in transactions or intending to engage in transactions with us, where your personal data may be part of such transaction.
- (b) Non-life Insurance Agent or Non-life Insurance Broker for the purpose of promoting or encouraging competition in creating achievements or generating motivation.
- (c) Our consultants, who are professionals such as lawyers, doctors, auditors, or other internal or external consultants or experts.
- (d) Our service providers or agents of service providers (including sub-service providers).
- (e) Organizations that are relating to insurance, such as the Office of Insurance Commission (OIC), the general insurance association, other associations or federations of businesses related to insurance.
- (f) Any government agency responsible for taxation, regulation, or authority over us, as required by law, or upon request for disclosure in our interest or for the public interest.
- (g) Individuals or other entities who are authorized under relevant laws.
- (h) Individuals or other entities to whom you have consented to disclose your personal data.

5.2. 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.

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- 5.3. 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.
- 5.4. In the event that 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. In certain cases, we may request your consent for sending or transferring your personal data to a foreign country, in accordance with the criteria stipulated by the Personal Data Protection Law.

6 Duration of Personal Data Retention

- 6.1. We will retain your personal data for the duration necessary to achieve the Specified Purposes for collecting and processing such personal data. The retention period for personal data will vary depending on the Specified Purposes for collecting and processing that personal data. In addition, we will retain the personal data for the duration required by relevant laws (if any), considering the legal statute of limitations for potential claims arising from or related to the documents or personal data we collect for each matter, along with our business practices for each type of personal data.
- 6.2. In this regard, we will retain your personal data for no longer than 10 years from the date the transaction between you and us ends. However, we may retain your personal data for longer than this period if permitted by law.
- 6.3. After the specified period, the Company will destroy such personal data from the Company's storage or systems, or anonymize your personal data, possibly without prior notice.

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.

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- 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.
- 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 with 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 ensure 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.

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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
- **Telephone** 02 820 7000 or 1219

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 22nd December 2025

- signature -

(Isorasak Thesratavong)

Chief Executive Officer