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For directors and employees of the Company

## Privacy Notice

Ergo Insurance (Thailand) Public Company Limited (“**Company**”) is highly aware of the importance of the protection of Personal Data and strictly respect your privacy. Therefore, the Company has 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**”) and to clarify to you, as the data subject, about the details and methods of handling data that may identify you, whether directly or indirectly, as stipulated by the Personal Data Protection Law (“**Personal Data**”), including the purposes of collecting, using, or disclosing (“**Processing**”) your Personal Data, the retention period of your Personal Data, as well as your legal rights related to Personal Data. In this regard, you can study the details below.

### 1. The categories or types of individuals from whom the Company collects the Personal Data.

The Company will collect, use, or disclose your Personal Data, which may be in the position of:

- (a) **Personnel/Employee** which means an individual who works or performs any duties for the Company and receives wages, benefits, or any other compensation, regardless of how it is named, from the Company in return for work or for performing duties, such as directors, executives, managers, employees, personnel, interns, or any other individuals with similar characteristics, but excluding contractors or service providers who are business partners of the Company.
- (b) **Job applicant** which means an individual who may be selected as personnel/employee of the Company where the Company may collect Personal Data of the job applicant directly or may receive it from the third parties.
- (c) **Individual related to job applicants and personnel/employees** which means an individual associated with job applicants and personnel/employees of the Company. This includes those whose Personal Data appears in relevant documents, such as family members (e.g., parents, spouses, and children), emergency contacts, references (Reference Person), beneficiaries, individuals connected/related in the director and executive conflict of interest reports, and work guarantors, and so on.

### 2. The methods by which the Company collects and receives your Personal Data.

The Company collects your Personal Data via the following channels.

- 2.1. **In the case where you give your Personal Data directly to the Company**
  - When you submit a job application and accompanying documents to the Company, whether by walking in, applying at the Company’s recruitment booth, applying through the

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Company's website (<http://www.ergo.co.th/about-us/career/>), including during the interview process with the Company.

- When you enter into contracts or legal transactions with the Company, such as Employment Agreement and/or Directorship Agreement (if any).
  - When you provide documents containing your Personal Data to the Company.
  - When you communicate with the Company, whether in written form, verbally, by telephone, or electronically, regardless of who initiated the contact.
- 2.2. **In the case where the Company receives your Personal Data from third parties**
- The Company may receive your Personal Data from the Reference Person, former employers, family members, educational institutions, or your work guarantors as you specified in your job application.
  - The Company may receive your Personal Data as a family member, emergency contact, Reference Person, beneficiary, or work guarantor from job application and/or documents of job applicants or personnel or employees associated with you.
  - The Company may receive your Personal Data from recruitment agencies or job application websites.
  - The Company may collect your Personal Data from government agencies or various public sources, such as the Royal Thai Police.
- 2.3. **In the case where the Company collects your Personal Data automatically**
- When you visit and/or use the Company's website or various online services where cookies or similar technologies are applied.
  - When you access to the Company's 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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3. Personal Data that will be collected

The Company collects your Personal Data, whether it is Personal Data you provide to the Company directly or Personal Data the Company receives from third parties or Personal Data the Company collects from you automatically. This will include the following Personal Data:

- 3.1. **Personal information** For example, Name, surname, date of birth, age, nationality, religion, ID card no., passport no., weight, height, body proportion, military status, occupation, family information (e.g. parents, spouse, and children), photographs and signature.
- 3.2. **Contact information** For example, Address, telephone number, email, social media contact information.
- 3.3. **Information regarding educational background** For example, Educational background, academic results, achievements, and various skills such as language skills, computer skills, and typing skills.
- 3.4. **Health information** For example, Health history, health status, chronic diseases, disabilities, impairments, physical abnormalities, medical history, accident history, information contained in medical certificates.
- 3.5. **Information regarding job applications** For example, Personal profile, work history (e.g., start date, end date, current job position, current salary, job description, reasons for seeking a change in employment/reasons for resignation), information about relatives or acquaintances working in the Company (e.g., first name, last name, department, relationship with the job applicant, phone number), qualification certificates, academic transcripts, criminal allegations, information reflected in the Resume/CV, position applied for, expected salary, availability to start work, interview information, evidence or reference letters, and information contained in the interview evaluation form (e.g., assessment results, knowledge and experience, personal characteristics, teamwork skills, and potential).
- 3.6. **Information regarding job performance and evaluation** For example, Employee ID, position, department, start date, chain of command, performance evaluation, past achievements and/or awards, training information, disciplinary action information, resignation letter, and reason for resignation.
- 3.7. **Information regarding benefits and compensation** For example, Salary, wages, compensation, bonuses, details about commission, welfares, bank account numbers, information about work guarantors, beneficiary information, social security information, provident fund

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information, tax-related information, tax deduction information, health benefits information, and/or (including for family members) other benefits, information regarding the use of Company's benefits, information appearing in the payroll deduction authorization letter, receipts, invoices, accident insurance claim forms, health and life insurance forms, and benefit approval requests for employee retirement.

- 3.8. **Information regarding registration statistics** For example, Start date, probationary period end date, date and time of work, number of hours worked, number of overtime hours, annual leave, leave days, leave details including reasons for leave, company attendance records, and records of use of various Company's systems.
- 3.9. **Information used as evidence in various legal transactions** For example, Personal data contained in a copy of ID cards, copy of passports, copy of name change certificate, copy of house registration, copy of military service certificate, copy of bank account passbook, copy of marriage certificate, copy of birth certificate, forms for requesting approval of new and monthly employee salaries, beneficiary designation forms, social security registration forms, employment contracts, employment guarantee letters, and any other related documents (e.g., position certificates, salary certificates), Directorship Agreement, and power of attorney.
- 3.10. **Technical information** For example, Computer traffic data (Log), IP Address of computers, and data that the Company collects through cookies or other similar technologies.
- 3.11. **Other information** For example, Recorded audio of conversations, still images, moving images and audio captured by surveillance cameras (CCTV).

## 4. Purposes and lawful basis for Processing of the Personal Data

- 4.1. The Company processes your Personal Data for the following purposes (the “**Specified Purposes**”).
- (a) For the purposes of recruiting, selecting job applicants, interviewing, and any actions related to recruitment.
  - (b) For the purposes of processing related to employment and onboarding personnel/ employees, such as entering into employment contracts, executing work guarantee contracts, specifying beneficiaries, registering insured persons, and conducting background checks.

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- (c) To fulfill rights and obligations under the contract between the Company and you.
- (d) For the purposes of action related to being a director of the Company, such as verifying and assessing the qualifications of directors, and notifying details of new directors to relevant government agencies.
- (e) For the purpose of paying salaries, wages, bonuses, compensation, commission, or any other benefits.
- (f) For the purpose of managing the welfare and benefits of the Company's personnel/employees, including but not limited to medical expense reimbursement, annual health check-ups, insurance, and insurance-related claims.
- (g) For the purpose of performing the duties of directors as representatives of the Company and for the purpose of performing the duties of personnel/employees under employment contracts, employment agreements, appointment contracts, or any other contracts entered into with the Company.
- (h) For the purpose of evaluating the performance or duties of personnel/employees.
- (i) For the purpose of managing personnel/employees training, including but not limited to registration and facility management.
- (j) For the purpose of communicating with clients, business partners, service providers, external agencies, or any other similar individuals with whom you are involved in your work for the Company.
- (k) For the purpose of managing human resources in other matters, such as disciplinary action, termination, resignation, and retirement.
- (l) For the purpose of communicating with job applicants, personnel/employees, and those related to personnel/employees.
- (m) For the purpose of complying with laws related to the Company's business, such as the laws on labor protection, the laws on social security, the laws on provident fund, tax law, the laws on non-life insurance, the laws on anti-money laundering, the Personal Data Protection Law, as well as lawful orders from government agencies and relevant officials, such as the Office of the Insurance Commission (OIC) and the Personal Data Protection Commission.
- (n) For establishment, compliance, exercise or defense of legal claims.
- (o) For the purpose of monitoring and maintaining public order and ensuring the safety of individuals and the Company's properties.
- (p) 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.
- (q) For other purposes that the Company will notify you of.

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- 4.2 The Company 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 the Company is subjected, including but not limited to achieving the purposes related to public health or other significant public benefit.
  - (c) It is necessary for the Company's legitimate interests or any other persons or juristic persons other than the Company, unless such benefits are less important than your fundamental right to Personal Data.
  - (d) It is necessary for the performance of a task carried out in the public interest by the Company, or it is necessary for the exercising of official authority vested in the Company;
  - (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 the Company when none of the aforementioned exceptions or lawful bases apply.
- 4.3. In the case where your Personal Data that the Company will proceed with the Processing for the Specified Purposes is necessary for the accomplishment of purposes regarding the compliance with the law or entering into a contract with you, the Company will collect, use or disclose your Personal Data for accomplishing such purposes.  
However, if you do not wish to provide such Personal Data for the Company, there may be legal implications, or the Company may not be able to fulfill our obligations under the contract the Company has with you or may not be able to enter into a contract with you (as the case may be).  
In such case, the Company may need to decline entering into a contract with you or cancel the provision of welfares or benefits related to you, whether in whole or in part.
- 4.4. In the event that the Company needs to process your Personal Data for purposes other than the Specified Purposes, the Company 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 (if any).

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**5. Disclosure of the Personal Data**

5.1. Subject to the Specified Purposes and the criteria required by law, the Company may disclose your Personal Data to the following individuals and agencies.

- (a) Alliances, business partners, service providers, service recipients, and/or personal data processors that the Company assigns or hires to handle, provide the services, or manage or process Personal Data for the Company in providing various services, such as information technology services, data recording services, payment services, mail services, parcel delivery services, printing services, health services, insurance services, data analysis services, or any other services that may benefit you or be related to the Company's business operations, such as commercial banks, hospitals, life insurance companies, non-life insurance companies.
- (b) The Company's consultants, such as legal consultants, lawyers, auditors, or any other experts.
- (c) 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), Department of Provincial Administration, Department of Business Development, the Office of the Personal Data Protection Commission, Trade Competition Commission of Thailand, the Royal Thai Police, Department of Special Investigation, the Office of the Attorney General, the Court, Department of Legal Execution.
- (d) Organizations that are relating to insurance, such as the general insurance association, Thai Insurance Brokers Association.
- (e) Clients, beneficiaries, business partners, agents, brokers, service providers, and/or a representative of the person you are in contact with or associated with in your duties or position, or any other person of a similar nature.
- (f) Individuals or other entities to whom you have consented to disclose your Personal Data.

5.2. When disclosing your Personal Data to others, the Company will act solely under the Specified Purposes or other purposes permitted by law. In the case where the law requires your consent, the Company will obtain your consent before disclosing your Personal Data to the others.

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- 5.3. When disclosing your Personal Data to others, the Company 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 the Company sends or transfers your Personal Data to a foreign country, the Company will ensure that the destination country, international organization, or foreign recipient has adequate personal data protection standards or comply with the criteria set by the Personal Data Protection Law, unless exempted by the Personal Data Protection Law. Additionally, in certain cases, the Company may request your consent for sending or transferring your Personal Data to a foreign country.

**6 Duration of Personal Data Retention**

- 6.1. The Company 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 the Company processes.
- (c) the practices of the Company, the non-life insurance sector, and the relevant sectors for each type of Personal Data.

In this regard, the Company will retain your Personal Data for no longer than [10] years from the date the transaction between you and the Company ends. However, the Company may retain your Personal Data for longer than this period permitted by law or if such retention is necessary to establish the Company's legal claims.

- 6.2. After the specified period, the Company will delete or destroy the Personal Data stored in the Company's system and/or of other persons who provide services to the Company (if any), or anonymize your Personal Data, unless it is the case where the Company can continue retaining such Personal Data as permitted by the Personal Data Protection Law or other relevant laws.

**7. Your rights regarding Personal Data**

As a data subject, you have various rights regarding your Personal Data, under the criteria, methods and conditions stipulated by the Personal Data Protection Law. In this regard, if you wish to exercise your rights, you can contact the Company through the contact details provided in Article 9 of this Privacy Notice.

- 7.1. **Right to Access** You are entitled to access your Personal Data and request the Company 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.

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- 7.2. **Right to Access** You are entitled to access your Personal Data and request the Company to make a copy of such Personal Data for you as stipulated by Personal Data Protection Law.
- 7.3. **Right to Data Portability** You are entitled to receive the Personal Data concerning you in the format which is readable or commonly used by ways of automatic tools or equipment, and to request 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.
- 7.4. **Right to Object** You are entitled to object the Processing of your Personal Data as stipulated by Personal Data Protection Law.
- 7.5. **Right to Erasure** You are entitled to request the Company to erase, destroy or anonymize your Personal Data as stipulated by Personal Data Protection Law.
- 7.6. **Right to Restrict the Processing** You are entitled to request the Company to restrict the Processing of your Personal Data as stipulated by Personal Data Protection Law.
- 7.7. **Right to Rectification** You are entitled to request the Company to rectify your Personal Data if your Personal Data is inaccurate, not up-to-date, incomplete or misleading.
- 7.8. **Right to Withdraw the Consent** In the event that the Company relies 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 the Company, unless there are legal or contractual restrictions on the right to withdraw consent that benefit the data subject.
- 7.9. **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.

The Company will proceed to review your request to exercise your rights. You may need to provide the relevant information and documents to the Company to support the consideration of your request. In this regard, the Company reserves the right to evaluate your request to exercise your rights and act in accordance with the Personal Data Protection Law.

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**8. Data Security**

The Company has 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.

**9. How to Contact the Company**

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 1219 or 7000

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

The Company 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. The Company will notify you of any important amendments or changes to the Privacy Notice along with the updated Privacy Notice through appropriate channels. The Company recommends that you review the changes to this Privacy Notice from time to time.

Updated on 22<sup>nd</sup> December 2025

- signature -

(Isorasak Thesratanavong)

Chief Executive Officer