

Personal Data Protection Policy

ERGO Insurance (Thailand) Public Company Limited (“the Company” or “we”) recognizes the importance of your privacy rights and strictly comply to the protection of personal data. Therefore, we have created this Personal Data Protection Policy (“Policy”) in order to comply with the Personal Data Protection Act B.E. 2562 and any other laws related to the protection of personal data both in force at present and as it may be amended or added in the future (collectively referred to as “The Personal Data Protection Act”).

This Policy is intended to implement to the collection, using and disclosure (collectively referred to as “Processing”) your personal data who be Non-life Insurance Agent or Broker of the company, Applicant for Non-life Insurance Agent or Broker of the company, as well as involved persons to above persons such as spouse and guarantor.

In addition, this Policy describes how we collect your personal data, purpose of personal data processing and retention periods for personal data as well as your rights as a personal data subject. We will only collect your personal data as necessary to operate under the notified purposed. If the Personal Data Protection Act requires that the processing of any personal data requires your consent, we will request your consent first. Please find more details as follows:

1. Who will we collect Personal Data

- (a) Agents
- (b) Brokers
- (c) Applicant who apply for agent or broker
- (d) Involved person to agent/broker or applicant who apply for agent or broker

2. What kind of personal data where we collects

2.1 Directly, Our website, other electronic

- When you apply for agent or broker of the company as well as entering into a contract of agent or broker, service contract, guarantee contract, and/or any agreement or contract related to the company
- When you fill out, sign, or deliver the application form of agent or broker, guarantee request form, termination letter for guarantee and/or any form or document related to agent or broker

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- When you communicate with us whatever any parties start the communication by verbal, writing, telephone, electronic
- When you request us to contact back for perform as your request such as request information, complaint, or others
- When you request for correction, changing, and improve your data
- When you join in our sale promotion, lucky drawing, doing survey form, any events that held by us or on behalf of us and/or our staffs and partners

2.2 Third parties

- When applicant who apply for our agent or broker, agent, or broker inform or send your personal data to the company
- When our business partners send your personal data to the company
- We may collect your personal data from public area or trading information source which including but not limited to other insurance company, association or federation that related to insurance, government agency such as OIC or the source that you can find on internet or social medias

2.3 Automatic

- When you visit and/or use our website, application, online services which has a cookie or similar technologies
- When you use our services or contact us at our office where CCTV be installed (for more information, please go to PDPA policy for CCTV using www.ergo.co.th)

3. What kind of personal data where we collects

3.1 Personal data

3.2 Education data

3.3 Working data

3.4 Working efficiency data

3.5 Financial data

3.6 Benefit and remuneration

3.7 Asset data

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- 3.8 Any data that you perform any transaction in type of juristic person such as your data that available on Company certificate, shareholder list, etc.
- 3.9 Criminal Record
- 3.10 Technical data
- 3.11 Others such as recording of CCTV

In the operation of our non-life insurance business, it is essential that we collect your sensitive personal data because those data is necessary for our underwriting as well as paying compensation or providing any other service to you. We will collect, use and disclose those sensitive personal data in case of be required or permitted by law or be clearly consented by you.

In case of your personal data was collected before effective date of PDPA act B.E. 2562, we will collect and use your personal data as the same purposes of those data collection. If you would not us to collect and use your personal data, you shall have the right to withdraw your consent by sending your request to us via detail in clause no. 9 (how to contact us)

4. Purposes of collection, using, and disclosure your personal data

4.1 Purpose of personal data processing

- (a) To check and verify your identity and/or any juristic person that you perform
- (b) To check your history before and during enter into contract with you or your juristic person and you may be checked during you or your juristic person be under the period of our contract
- (c) To consider for making agent or broker contract, service contract, guarantee contract, or any contract with you, or to perform as the contract that you are our party
- (d) To manage non-life agent or broker business and your personal data may be use for legal compliance and required regulations as well as compliance with regulations of regulator both local and abroad as the case may be
- (e) For the purpose of promoting or encouraging competition for success or for sale promotion and/or offer our products
- (f) To investigate or check any action related to fraudulent, conceal real information, and other offense

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- (g) To communicate between you and the company
- (h) To perform as the laws or regulations related to our business
- (i) To perform as the orders of related government agency and officers
- (j) To collect, use and/or disclose the personal data to the Office of Insurance Commission (OIC) for the purpose of supervision and promotion of insurance business under the Insurance Commission Act and Non-life insurance Act as the personal data protection policy of the OIC which you can find more information at the website <https://www.oic.or.th>.
- (k) To do research or analyze for product and service development
- (l) To establish, comply with, exercise, or defence of legal claims
- (m) To maintain order, check and investigate any events related to safety
- (n) To perform other necessary of business operation that be useful to you or directly related to above purposes
- (o) For other purposes that we inform you when we collect your personal data

4.2 We process your personal data as above purposes under the base of law as follows:

- (a) where it is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract
- (b) where it is necessary to comply with any laws
- (c) where it is necessary to legitimate interests of us or any other persons or any other juristic person
- (d) where it is necessary for the performance of a task carried out in the public interest by the company, or in order to exercise the official authority vested in the company
- (e) when necessary for the establishment, compliance, exercise, or defence of legal claims
- (f) for preventing or suppressing danger to a person's life, body or health
- (g) for archives purposes relating to research or statistics, in which suitable measures to safeguard your rights and freedoms are put in place or

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(h) your consent that you have gave us when unable to rely on exemption or refer to base of legal as specified above

4.3 Some of your personal data is information that we need to process for compliance with law or perform as the contract or for entering into an contract with you so if you don't give those data to us, it may have legal effect or we may not be able to perform our duties under an contract that has entered into with you or unable to provide services related to our products or services as well as our claim service(case by case) and we may need to refuse to enter into an contract with you or cancel the service related to you either all or any

4.4 In case that we will process your personal data other than specified purposes, we will make additional privacy policies or notices and/or send a letter to you to explain about personal data processing. However you should study additional policy or notices that related to this policy

5. Who will we disclosure personal data to

5.1 We may disclose your personal data under specified purposes and criteria as required by law to the following persons:

- (a) Any person who do transaction or will do transaction with the company
- (b) Agents or Brokers of company for the purposes of promoting or encouraging competition for success
- (c) Our consultants such as attorney, doctors, auditors, or consultants, or experts both internal and external
- (d) Service provider or representative of service provider of the company
- (e) Any agency that related to insurance such as OIC or TGIA
- (f) Government agencies that related to tax, regulations, or regulators as required by law
- (g) Any person or agency who be allowed by the related law
- (h) Any person or agency who be consented by you

5.2 We will only disclose your personal data under the specified purposes or other purposes that prescribed by law and if the law requires your consent for disclosure, we will request your consent.

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5.3 We have appropriated measures to protect your disclosed personal data to comply with PDPA act 5.4
In case of we have to send or transfer your personal data to abroad, we will make sure that the destination, international organization, or data receiver of those country have an enough standard personal data protection or it be according with required PDPA law but except the exemption by PDPA law however we may request your consent for sending or transfer your personal data to abroad

6. How long we keep your personal data

6.1 We will retain your data as necessity to achieve the specified purposes for data collection and processing which the period of retaining will depend on specified purposed and as required by related law (if any) by consider to prescription of case that may occur or involved documents or collected data as well as consider to business guideline for each personal data

6.2 We will retain your personal data for a period of ten years after the end of the transaction however we may retain your personal data more than those period if be allowed by law

6.3 We will destroy your personal data or anonymize the Personal Data to become the anonymous data which cannot identify after those period without advance informing

7. Rights on your personal data

7.1 Right to access data

You shall have the right to access your personal data and have a right to request copy of your personal data, or to request the disclosure of the acquisition of the Personal Data obtained without his or her consent as prescribed by PDPA law

7.2 Right to transfer data

You shall have the right to receive your personal data and request us to send or transfer your personal data to other personal data controller or your representative, unless it is impossible to do as prescribed by PDPA law

7.3 Right to object data processing

You shall have the right to object your data processing as prescribed by PDPA law

7.4 Right to erase data

You shall have the right to request us to erase or destroy the Personal Data, or anonymize the Personal Data to become the anonymous data which cannot identify the data subject as prescribed by PDPA law

7.5 Right to restrict the use of data

You shall have the right to request us to restrict the use of the Personal Data as prescribed by PDPA law

7.6 Right to correction data

You shall have the right to request us to correct your personal data if it is inaccurate, not up-to-date, incomplete, and misleading

7.7 Right to withdraw consent

You shall have a right to withdraw your consent on data processing if we requested your consent for processing, unless there is a restriction of the withdrawal of consent by law, or the contract which gives benefits to the data subject.

7.8 Right to file a complain

You shall have the right to file a complaint to compliance agency as the procedure that prescribed by PDPA law in the event that we violates or does not comply with PDPA act.

If you require to use the rights as above, you can contact us as detail in clause no. 9 (how to contact us) and we will check your request which related information and documents may be requested by us to be a reference for consideration however we reserve a right to consider your request and perform as PDPA act.

8. Security of personal data keeping

We provide appropriate data keeping system and technical & management security measures for preventing using, disclosure, destroy, or access without consent and to make sure that the security level is accordance with criteria and procedures specified by PDPA act and other related laws

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9. How to contact us

If you have any questions regarding this policy or would like to use your right as defined in clause no. 7, please contact data protection officer as below:

Address: 126/2 Krungthonburi Road, Banglamphulang, Klongsan, Bangkok 10600

Email: dpo@ergo.co.th

Telephone no. : 02-820-7000 or 1219

10. Change of Policy

We may sometime change this policy to according to any change related to your personal data processing and according to any change of PDPA law or related laws which we will inform you the correction or the change of any keys of this policy as well as the updated policy via appropriated channel however we recommend that you should sometime check the change of this policy.

Update on April 10, 2024



(Dr.Till Boehmer)

Chief Executive Officer