

## 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 natural person or director, executive, employee, coordinator of juristic person that wish to be a business partners of the company in currently which produce, provide, and/or bid the price for offering product to the company, supplier and/or service provider which the company may has business relationship with you or juristic that you are operating. For example, you or juristic that you are operating be a supplier or service provider to us, be and agent to sale products to us, be a service provider, be a consultant, be an expert, or contact any business with us.

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.

The company reserves the right to amend, add, change or update the policy at any time as permitted by the Personal Data Protection Act. Please find more details as follows:

### 1. Where we get your Personal Data

#### 1.1 Directly

- When you enter into contract with us or make an agreement regarding service providing or product selling
- When you fill out any form whatever document, electronic, or any channels
- When you deliver any document that your personal data shown on it
- When you communicate with us or inquire any question to us

## 1.2 Third parties

- When your employer, agent, or coordinator send your personal data to us
- When our business partner, our affiliated company, or other service providers send your data to us
- We may collect your personal data from public area or trading information source which including but not limited to information providing service, medical information source, public health cent, hospital, doctor, public health professional, other insurance company, association or federation that related to product or service that you purchased, government agency such as OIC or the source that you can find on internet or social medias

## 1.3 Automatic

- When you contact us at our office where CCTV be installed (for more information, please go to PDPA policy for CCTV using [www.ergo.co.th](http://www.ergo.co.th))

## 2. What kind of personal data where we collects

### 2.1 Personal data

### 2.2 Contact data

### 2.3 Financial data

### 2.4 Evidence for any transaction such as any personal data that shown on your ID card

### 2.5 Any data that you perform any transaction in type of juristic person such as your data that available on Company certificate, shareholder list, etc.

Product details and/or any services that you ever bought from us or other insurance companies

### 2.6 Others such as recording of conversation on telephone, recording on CCTV

## 3. Purposes of collection, using, and disclosure your personal data

### 3.1 Purpose of personal data processing

(a) To enter into contract with you or juristic person that you perform and/or to perform as duties on the contract

(b) To verify your identity and/or juristic person that you perform

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- (c) To check your history or your qualification 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
- (d) To procure and purchase products or services from you or your juristic person as well as manage partner selection, auction, check your data and qualifications, and perform as our procurement policy and any similar process
- (e) To perform as our internal regulations such as opening vendor account
- (f) To contact or coordinate with you or your juristic person regarding business as well as send news or any public relations that you or your juristic person be interested or may be useful for you
- (g) To perform as the laws related to our business
- (h) To perform as the orders of related government agency and officers
- (i) To establish, comply with, exercise, or defence of legal claims
- (j) To check and investigate any events related to safety
- (k) 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>.
- (l) To maintain order, audit, and investigate any security-related incidents such as trespassing on our premises, buildings or company premises, access to unauthorized areas, theft, fire, any criminal, and to maintain the security of our personnel and third parties at our business premises. including our assets and information
- (m) To perform other necessary of business operation that be useful to you or directly related to above purposes
- (n) For other purposes that we will inform you

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

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- (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) for preventing or suppressing danger to a person's life, body or health
- (f) when necessary for the establishment, compliance, exercise, or defence of legal claims
- (g) your consent that you have gave us when unable to rely on exemption or refer to base of legal as specified above

3.3 In case that your personal data that we will process as specified purposes is necessity data to achieve the purposes regarding to law compliance or necessity to enter into contract with you, we will collect, use or disclose your personal data to achieve those purposes however if you would not like to give your personal data to us, it may have legal effect or we may not be able to perform our duties under the contract that has entered into with you or unable to enter into contract with you (case by case) and we may need to refuse to enter into contract with you or cancel purchasing or using services from you either all or any

3.4 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

**4. Who will we disclosure personal data to**

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

- (a) Our Business partners included you our executives, directors, staffs, employees, and/or internal personnel of company as necessity for personal data processing
- (b) Agents or Brokers of company

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- (c) Our consultant such as auditors, legal consultant, attorney, or any experts
- (d) Partners, Service Provider, and a person who be assigned or employed by us to process or manage personal data for our business benefit
- (e) Government agencies that having duty on compliance with legal or that request to disclosure personal data by virtue of law or related to legal process or be allowed by related law such as OIC, AMLO, Revenue department, etc.
- (f) Organizations that related to insurance business such as TGIA and other associations or federal in insurance business
- (g) Any person or agency who be consented by you

4.2 We have appropriated measures to protect your disclosed personal data to comply with PDPA act and when 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

4.3 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.

## 5. How long we keep your personal data

5.1 We will retain your data as necessity to achieve the specified purposes for data processing only which it depends on specified purposes and the factors as follows:

- (a) Period of time as required by related law (if any)
- (b) Prescription as the law that related to personal data which we are processing
- (c) Regulations of Non-life insurance business or related business

We will retain your personal data for a period of ten years after the end of the transaction or legal relation however we may retain your personal data more than those period if be required by law or it is necessary for establish of legal claims

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5.2 We will erase or destroy those personal data and/or other's personal data who serve to us (if any) or anonymize the Personal Data to become the anonymous data which cannot identify except we are able to retain those personal data as prescribed by PDPA law or related laws

6. Rights on your personal data

6.1 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

6.2 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

6.3 Right to object data processing

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

6.4 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

6.5 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

6.6 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

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6.7 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.

6.8 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 violate 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. 7 (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.

7. 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](mailto:dpo@ergo.co.th)

Telephone no. : 02-820-7000 or 1219

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( Dr.Till Boehmer )

Chief Executive Officer