

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 customers, insureds, prospects, beneficiaries, person entitled to claim under the insurance contract, victims, sufferers, or third parties who have the right to claim compensation from the Company.

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. Where we get your Personal Data

1.1 Directly, Our Agents/Brokers, Our website, other electronic

- When you buy our Non-life insurance, products, and/or any services
- When you send us insurance application form and/or any documents for purchasing our Non-life insurance, products, and/or any services or providing data to us for consideration of purchasing our Non-life insurance, products, and/or any services
- When you communicate with us whatever any parties start the communication by verbal, writing, telephone, electronic
- When you contact us, our agents/brokers, staffs/employees, via directly, interview, website, application, social media, telephone, email, SMS, Fax, post, or any ways
- When you claim insurance with us
- 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 improvement any detail related to Non-life insurance, any products, or any services which you purchased from us

For Client/ Prospect/ Beneficiary/ Sufferer
Translation Version

- 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

1.2 Third parties

- When our business partners send your personal data to us for the benefit of proposing and/or providing our services to you and for doing related business
- 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 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)

2. What kind of personal data where we collects

2.1 Personal data

2.2 Health data

2.3 Financial data

2.4 Travelling data

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

2.6 Technical data

2.7 Status of person who be restrict by the law such as FATCA

2.8 Criminal Record

2.9 Others such as behavior or trend of purchasing, 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

For Client/ Prospect/ Beneficiary/ Sufferer
Translation Version

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)

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

3.1 Purpose of personal data processing

- (a) To offer or sale our insurance products or services
- (b) To underwrite or make contract with you or perform duties as the contract that you made with us
- (c) To comply with procedures and processes of our services and products
- (d) To do payment transaction for our products and/or services as well as any related action
- (e) To check your facts or prove or verify your identity before making any contract or any transaction with you
- (f) To communicate between you and the company
- (g) To send our sale promotion, product and services information
- (h) To reinsure to reinsurer
- (i) To design our new products and/or services or develop our exist products and/or services
- (j) For marketing research, deep analytics, statistical or actuarial research, Financial report or assessment which be done by us, our staff or partners or related regulator
- (k) To investigate or check any action related to fraudulent, conceal real information, and other offense
- (l) To allow you to access content on website, application or social media platform, or any service
- (m) To track behavior of using websites, applications or social media platforms for analysis of your using on websites, applications or social media platforms and understand your usability that you are interested for developing the websites, applications or social media platforms
- (n) To review our business both by internal and external

For Client/ Prospect/ Beneficiary/ Sufferer
Translation Version

- (o) To perform as our internal policy
- (p) To perform as the laws or regulations related to our business
- (q) To perform as the orders of related government agency and officers
- (r) 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>.
- (s) To establish, comply with, exercise, or defence of legal claims
- (t) To maintain order, check and investigate any events related to safety
- (u) To test internal system or test company's data base
- (v) To receive your complain and comment related to our products and/or services for development
- (w) To perform other necessary of business operation that be useful to you or directly related to above purposes
- (x) For other purposes that we inform you when we collect your personal data

3.2 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

For Client/ Prospect/ Beneficiary/ Sufferer
Translation Version

- (h) it is necessary for compliance with a law to achieve the purposes on substantial public interest, by providing the suitable measures to protect the fundamental rights and interest of the data subject or
- (i) your consent that you have gave us when unable to rely on exemption or refer to base of legal as specified above

3.3 Some of your personal data is information that we need to process for compliance with law or perform as the insurance contract or for entering into an insurance 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 insurance 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 insurance contract with you or cancel the service related to 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) Agents, Brokers, or authorized person of the company
- (b) Policy holder in case of group insurance
- (c) Reinsurance Company
- (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) TGIA, Other association or federation related to insurance business, and other insurance company
- (f) 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.
- (g) Our consultant such as doctors, auditors, legal consultant, attorney, or any experts
- (h) Any person who do transaction or will do transaction with the company
- (i) Any person or agency who be allowed by the related law

(j) 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

5.2 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

6. Youth's Data

We may sometime collect and process minor's data who is not sui juris. We will comply with PDPA law related to personal data processing and request the consent from legal representative or holder of parental responsibility

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 as prescribed by PDPA law

7.2 Right to transfer data

For Client/ Prospect/ Beneficiary/ Sufferer
Translation Version

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

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

For Client/ Prospect/ Beneficiary/ Sufferer
Translation Version

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 June 7, 2023



(Dr.Till Boehmer)

Chief Executive Officer