

Privacy Policy

Sompo Insurance (Thailand) PLC (“Company”) is an insurance company that adheres to ethical business conducts, transparency and compliance with applicable laws and regulations governing non-life insurance business. Company is aware of your trust as **former and current Customer and relevant persons as well as Business partner**, who are data subject in our products and services, and recognizes your need for transaction and data security. Company, therefore, has specially paid attention to this matter.

For prioritizing your privacy and safeguarding your personal data, Company has set this policy for our business activities by providing strict measures in protecting your personal data to ensure you that your personal data which has been collected, used and disclosed (collectively called “process”) by Company, prior and after the execution date of Personal Data Protection Act B.E. 2562 and relevant regulations (“PDPA”), will be legally processed. Company also would like to inform you regarding this Company’s Privacy Policy with following detail;

1. Definition

1.1 “Personal data” means that any information relating to an identified or identifiable natural person, directly or indirectly, excluding the information of deceased natural person.

1.2 “Sensitive data” means any information that Personal Data Protection Act B.E. 2562 categorize to be a sensitive data in clause 26; for instance, race, ethnicity, political opinion, sexual preference, religion, criminal record, health history, labor union data, disability, biometric data, genetic data etc.

Both Personal data and Sensitive data will be herein collectively called “**personal data**”.

1.3 “OIC” means Office of Insurance Commission

2. Source of Data and Data collected by Company

The data and sources of collection will be different depending on the type of relationship between data subject and the Company. For more clarification, the details of source of data and data collected by the Company will be described as followed;

2.1 Prospect/Insured/ Beneficiary/family member/spouse (“Customer and relevant persons”)

Company needs to collect your personal data for processing pursuant to mentioned objectives herein through directly and indirectly methods. The sources of direct collection are composed of from data subject, sale channel, claim/compliant channel and other Company’s activities that directly contact data subject. The sources of indirect collection consist of Data subject’s assignee/authorized person, legal representative, sale channel, business partner, authority, associations that you are member, Thai General Insurance Association (“TGIA”), Road Accident Victims Protection Co., Ltd (“RAVP”), Public domain, Social media, Hospital/Clinic, Company’s activities, other insurance companies and any channels which does not breach your privacy right and PDPA.

The data which is required to be collected by Company for processing is as follows, but not limited to;

| Type of the Personal Data | Personal data which Company collects, uses and/or discloses |
|----------------------------|--|
| Personal information | Name- surname, Age, Date of birth, Sex, Marital status, ID card No., Passport No., Occupation, Position, Driving license No., Nationality, Tax ID No., Identification No. of Alien, Work permit No., Government Official No., Signature, Picture |
| Contact information | Home address, Workplace, Telephone number, E-mail address, ID line |
| Financial Information | Bank Account No./name, Credit/Debit card No., Income, Financial history, Loan data, investment data, Bankruptcy status, Foreign Account Tax Compliance |
| Insurance Transaction data | Insurance purchase history, Compensation/Claim record, Insured asset, Underwriting Declination record, Insurance policy No. |
| Electronic device data | IP address, MAC address, Cookie ID, Serial number |
| Sensitive data | Race, Religion, Disability record, Health history, Medical history, Wound/Accident record, Drug record, Police daily report, Police opinion, |

| | |
|----------------------------|---|
| | Medical certificate, Fingerprint, Photo/VDO of Wound /accident, Guilty/Offense history, Criminal record, Anti-money laundering and Counter Terrorism and Proliferation of Weapon of Mass Destruction Financing data |
| Other personal information | Sound record, Photo, Motion, Any data collected and used for underwriting, claim consideration, activities for insurance business, medical receipt, License plate No., Chassis No., Machine code, Property location, Deed, Copy of vehicle registration, request insurance No. etc. |

2.2 Business party, Service provider, Agent/Broker/ Witness on agreement (“Business partner”)

Company needs to collect your personal data for processing pursuant to mentioned objectives herein through directly and indirectly methods. The source of direct collection is from data subject. The sources of indirect collection are from your assigned/authorized personnel, authority, public domain, associations that you are member and any channels which does not breach your privacy right. The data which is required to be collected by Company for processing is as follows, but not limited to;

| Type of the Personal Data | Personal data which Company collects, uses and/or discloses |
|----------------------------|--|
| Personal information | Name- surname, Date of birth, Sex, Age, ID card No., Passport No., Signature, Agent/Broker License No. Occupation, Position, Nationality, Identification NO. of Alien, Work permit No., Martial status |
| Contact information | Home address, Workplace, Telephone number, E-mail address, ID line |
| Financial Information | Bank Account Name./No., Financial history, Bankruptcy status |
| Sensitive data | Religion, Criminal record, Anti-money laundering and Counter Terrorism and Proliferation of Weapon of Mass Destruction Financing data |
| Other personal information | Any required data for processing to perform the obligation on agreement between you and Company or Agent/Broker such as service/sale history, training history etc. |

The collection of your personal data will be different depending on type of insurance product and/or service that you purchase/receive from Company or make a transaction and/or contract with Company. Company will collect, use, disclose your personal data as necessary for only processing under the objectives provided herein.

Please note that providing personal data of others, such as prospect, beneficiary, family members etc., must be correct and valid. Moreover, you are required to inform such person concerning details specified on this policy by yourself and receive their consent (if required by laws) as well as comply with PDPA by yourself prior to providing their personal data to Company.

In case that you are a policy holder for group insurance policy, you need to deliver this policy to insured under group policy prior to disclosing Company the insured’s personal data. Furthermore, you must provide Represent and Warranty Document to Company and collect consent form for Company (if required by laws and/or Company) as well as securely retain such consent by yourself for being inspected by Company when requires.

However, Company would like to inform you that whether you cannot provide all required personal data as specified above to Company, it also affects an ability of Company to completely make transactions, enter into insurance contract, provide appropriate services, comply relevant laws by you and/or Company.

3. Objective of collecting, using, disclosing personal data

The objective of collecting, using, disclosing personal data will be different depending on type of relationship between data subject and Company. For more clarification, the objectives of collecting, using, disclosing your personal data will be described as followed;

3.1 **As Customer and relevant persons**, Company needs to collect, use, disclose personal data under the following objectives;

3.1.1 For providing Company’s product and/or service according to your request and according to insurance contract (Contractual basis and legal claim) as followed;

- a. To contact regarding insurance service / product
 - b. To perform right or obligations under insurance contract, such as claim process, claim consideration etc.
 - c. To provide risk survey, claim assessment, loss adjuster, compensation and any services relating claim.
 - d. To perform legal procedure, in case of liable to third-party or subrogation
- 3.1.2 To comply with applicable laws and relevant regulations (Legal Obligation), for instance; complying with order of competent authorities i.e. revenue department, Office of Insurance Commission; and/or, Non-life Insurance Law and relevant regulation, Tax Law, Anti-money Laundering Law, Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Law, Computer Law, Bankruptcy Law, and other laws and regulations governing Company's business with the example of the following purposes;
- a. To comply with Know your customer ("KYC") and customer Due diligence ("CDD") process under Anti-money laundering ACT B.E. 2542
 - b. To process personal data for OIC according to details mentioned on OIC's Privacy Notice in www.oic.or.th to conduct and govern insurance business, conduct watch-list, fraud and suspicious transaction prevention.
 - c. To process according to applicable laws and regulations, including but not limited to;
 - Article 90 under Civil Procedure Code of Thailand
 - Article 239 under Criminal Procedure Code of Thailand
 - Article 51 under Non-life Insurance Act B.E. 2535
 - Article 16 under Anti-money laundering ACT B.E. 2542
 - Article 12 (Tre) Revenue Code
 - Do-not call request under OIC 's regulation for Market conduct B.E. 2563 and 2565
- 3.1.3 To take necessary steps for the Company legitimate interests or other individual or juristic person which are not beyond your reasonable expectations (Legitimate Interest), for instance;
- a. To consider and recommend appropriate product/service to prospect
 - b. To facilitate to fill in the insurance request form and prepare relevant documents
 - c. To consider on underwriting when you submitted insurance request form and relevant documents to Company, including quotation and/or proposal.
 - d. To perform financial transaction relating to insurance contract
 - e. To Maintain relationship with customers, e.g. contact, complaint handling, satisfactory survey, etc.
 - f. To provide renewal notice and/or offer products/services including promotion of the same/similar type which you are using for your benefits.
 - g. To provide sale promotion, privilege and/or cross selling and/or upselling (which complying with laws) for develop Company's service (Marketing purposes) You have the right to deny receiving such marketing information.
 - h. To make insurance contract, co-insurance contract, re/sub-insurance contract
 - i. To take the survey, compile information for statistical analytics/research to enhance products and services, premium calculation matching with risk, Fraudulent investigation, as well as for the purpose of reinsurance
 - j. To Fulfill audit requirements and compliance supervision
 - k. To share to the Company's affiliates and/or related companies of the Sompo Group, agents, contractors, reinsurers or third-party service providers who provides administrative, telecommunications, payment, data processing or other services relating to business operation of Company.
 - l. To prevent, respond, and minimize potential risks arising from corruption, cyber threat, law violation (e.g. money laundering, terrorism and proliferation of weapon of mass destruction financing, offences related to property, life, body, liberty or fame); including sharing Personal Data to enhance work standards of affiliated companies/other companies in the same business in order to prevent, respond, and minimize the above risks
 - m. To record contact, voice or image during meetings, seminars or booth activities for being evidence

- n. To comply the Personal Data under court's receivership order
 - o. To provide the service and/or benefit according to insurance policy to beneficiary
 - p. Internal data management such as database for operation, comply data subject's request under PDPA
 - q. To provide to the competent authorities in case of cooperation i.e. revenue department, Office of Insurance Commission, Anti-money Laundering Office, and other authorities governing Company's business.
 - r. To provide any services as you request
 - s. To disclose to third person who make a transaction with Company on behalf of you, or your personal data being a part of making transaction with Company or third person who has a relationship with you and relating to conditions and benefits under insurance policy
 - t. Any process regarding the objectives specified herein
- 3.1.4 To take necessary steps for the Public interests and Substantial Public interests , for instance;
- a. To consider, make and comply with insurance contract, co-insurance contract, re/sub-insurance contract
 - b. To arrange the statistic in order to calculation the insurance premium according to the risk appetite, to investigate or prevent insurance fraud
 - c. To reject underwriting in some type of risk
 - d. To perform right or obligations under some type of insurance contract, such as claim process for insurance product relating health, accident matter, etc.
 - e. To assemble required data for OIC and other authorities for arranging a database
 - f. To process personal data for any purposes pursuant to laws and/or regulations or authorities' order governing Company's business
 - g. To provide to TGIA, RAVP, The Federation of Thai Industries for benefit to make a database for Non-life insurance market sector
 - h. To process personal data for OIC according to details mentioned on OIC's Privacy Notice in www.oic.or.th to conduct and govern insurance business, conduct watch-list and fraud prevention
- 3.2 **As Business partner**, Company needs to collect, use, disclose personal data for;
- 3.2.1 To accomplish the objectives in a contract between you and Company and claim if having a dispute (Contractual basis and legal claim), as followed;
- a. To comply with terms and conditions on agreement between Company and Business partner
 - b. To make a financial transaction pursuant to agreement between Company and Business partner
 - c. To receive/provide a consultation as mutually agreed by Company and Business partner
- 3.2.2 To comply with applicable laws and relevant regulations (Legal Obligation), for instance; complying with order of competent authorities i.e. revenue department, Office of Insurance Commission; and/or, Non-life Insurance Law and relevant regulation, Tax Law, Anti-money Laundering Law, Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Law, Computer Law, Bankruptcy Law, and other laws and regulations governing Company's business with the example of the following purposes;
- a. To comply with Know your customer ("KYC") and customer Due diligence ("CDD") process under Anti-money laundering ACT B.E. 2542
 - d. To process according to applicable laws and regulations, including but not limited to;
 - Article 90 under Civil Procedure Code of Thailand
 - Article 239 under Criminal Procedure Code of Thailand
 - Article 51 under Non-life Insurance Act B.E. 2535
 - Article 16 under Anti-money laundering ACT B.E. 2542
 - Article 40 Revenue Code
- 3.2.3 To take necessary steps for the Company legitimate interests or other individual or juristic person which are not beyond your reasonable expectations (Legitimate Interest), for instance;
- a. To verify your identification and authority prior to entering into contract
 - b. To share to the Company's affiliates and/or related companies of the Sompoo Group, agents, contractors, reinsurers or third-party service providers who provides

- administrative, telecommunications, payment, data processing or other services relating to business operation of Company.
- c. To provide to the competent authorities in case of cooperation i.e. revenue department, Office of Insurance Commission, Anti-money Laundering Office, and other authorities governing Company's business.
 - d. To fulfill audit requirements and compliance supervision
 - e. To perform legal procedure
 - u. To Maintain relationship with Business partner, e.g. contact, satisfactory survey, award, etc.
 - f. To manage Business partner, such as, incentives, award, performance evaluation, data analysis, statistic, survey, compliant, conflict of interest, etc.
 - g. To provide any services as you request
 - h. Any process regarding the objectives specified herein

Company will collect, use, disclose your personal data based on legal basis specified above or any basis designated in PDPA. In case of not having above legal basis, Company will process your personal data based on consent or explicit consent basis.

4. Disclosure of Personal Data

Company will not disclose your personal data to others if such disclosing does not comply with PDPA and this Policy. Company may disclose your personal data to others for various purposes but of being under objectives specified herein, such as, providing services to you, analyzing and developing products and/or services, marketing activities, receive support from service providers, verifying customers' identity, comply with laws and regulations, process co/reinsurance and any activities that is a market practice of insurance business etc.

Company may disclose personal data to others or entities. For example, affiliates, business partners, external service providers, agents, brokers, sub-contractors, auditors, external auditors, credit rating companies, co/reinsurance companies, competent authorities, any corporations or individuals under relationship or contract with Company; including executives, staffs, employees, contractors, agents, etc.

Company needs to disclose your personal data to the following persons;

- 4.1 Any authorities governing Company, such as, Office of Insurance Commission for the benefit of governing insurance business, Anti-Money Laundering Office, Revenue Department, etc. to comply with laws and regulations.
- 4.2 Associations relating to insurance business, for instance, Thai General Insurance Association, The Federation of Thai Industries for the purpose of analyzing the statistic, premium calculation and provide appropriate suggestion to insurance business.
- 4.3 Authorized person that Company legally authorizes to provide services on behalf of or for Company in regard of broker, agent, affiliate, actuary, underwriter, loss survey, claim settling, garage, Third party Administrator (TPA), RAVP, hospital, legal consultants, auditors, reinsurance company and/or co-insurance company, post office, financial institute or financial service provider, other service providers for any activities relating to insurance contract and/or business operation of Company and/or legal process as necessary.
- 4.4 To third person who make a transaction with Company on behalf of you, or your personal data being a part of making transaction with Company, such as, policy holder in group policy, etc.
- 4.5 To third person who has a relationship with you and relating to conditions and benefits under insurance policy, for instance, leasing service provider, lender, lessor/landlord/tenant, beneficiary, co-insured etc.
- 4.6 Others when receiving your consent/explicit consent to disclose or comply law or order of authority

Please note that the disclosing of your personal data depends on type of relationship between data subject and the Company.

The receiving person will process your personal data under the order or agreement of Company only and implement appropriate security measures to protect your personal data.

5. Data Transfer

Company will not transfer your personal data to others except of transferring according to the order of law/authorities or to Company's service provider/ business partner both in Thailand and across countries, Company's affiliates both in Thailand and across countries, which such destination may have or not have data

security measure equally. However, Company will implement procedure and any measures to ensure you that the transferred personal data will be secured, and the receiving person will implement appropriate security measure as well as any measures stated by laws.

Prior to transferring your personal data, Company will ask for your explicit consent (if required by laws) except for disclosing personal data for complying with an order of law/authorities or having a lawful basis.

6. Retention period of Personal Data

Company will collect your personal data as necessary as objectives mentioned above. Company collects and continue retain the received personal data from the receipt date by implementing suitable measures and any measures stated by laws (if any) to protect your personal data from collecting, using, disclosing, copying, adjusting, transferring, erasing, deleting or any risks without authority and/or illegal within retention period, including any updated or additional data obtained throughout the period of having a relationship. Moreover, under applicable laws and regulations, Company may retain your personal data for 10 years after the end date of relationship or the date of arbitration award or the date of final judgement of competent court (upon each case), except there is law and/or regulation to specify the Company to retain your personal data shorter or longer than the designated period herein. Thereafter, Company will permanently forthwith de-identify/erase/delete your personal data securely based on “Beyond use basis” as well as inform the receiving person to strictly comply with such practice.

7. Security of the Personal Data

Company will securely retain your personal data by implementing technical and administrative measures as well as any measures stated by laws (if any) to ensure appropriate security in the personal data processing and preventing personal data from any breach and/or leakage. Company has set policies and rules on Personal Data protection, such as Internal Personal Data Protection Policy, Security standards of information technology and any measures to prevent personal data from collecting, using or disclosing outside the objectives or without authorization or unlawfully. Company has developed the policies, rule and discipline as frequently as necessary and appropriate.

Moreover, the executives, current employee and contractors, agents, advisers, business partners and the receiving persons are obligated to keep the Personal Data in confidence pursuant to confidentiality measure provided by Company.

8. Right of Data Subject

The following rights are the rights according to Personal Data Protection Act B.E. 2562 and relevant regulations. . You are entitled to exercise a right(s) under the legal requirement and Company’s policy set forth herein and/or amendment/modification in the future as well as Company’s discipline.

In case that you are under 20 years old or your legal contractual capacity is restricted, your parent, guardian or legal representative may request to exercise the right on your behalf.

| No. | Your right | Brief explanation |
|-----|--------------------|--|
| 8.1 | Data Access | You may request to access to examine your Personal Data, request Company to make a copy of such data for you, including request to reveal a source of your Personal Data. |
| 8.2 | Data Portability | You may obtain your Personal Data if Company has organized such Personal Data in a format that is readable or usable and disclosable by automatic device/equipment, including request Company to directly send or transfer the Personal Data in such format to other data controller except of being impracticable by technical means. |
| 8.3 | Data Rectification | You may request Company to rectify your Personal Data to be correct, updated, complete and not misleading. |
| 8.4 | Objection | You may object the collection, use and/or disclosure of your Personal Data at any time. If such doing is conducted for public interest or legitimate interests of Company which is not beyond your reasonable expectation or |

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| | | other ground by laws, Company will continue collecting, using and/or disclosing your Personal Data only when Company can establish a legal basis that doing so is more important than your fundamental rights or to affirm legal rights; to comply with laws; or to defend a legal proceedings, depending on a case by case basis. |
| 8.5 | Data Erasure | You may request Company to erase, destroy or de-identify your personal data if you believe that the collection, use and/or disclosure of your personal data is against relevant laws; reasonable ground to believe that the personal data shall not be processed under the objectives specified herein or when you request to withdraw your consent or to object to the processing. |
| 8.6 | Processing Suspension | You may request Company to temporarily suspend processing of your personal data during the period where Company examines your rectification or objection request; or when it is no longer necessary and Company must erase or destroy your Personal Data pursuant to relevant laws but you instead request Company to suspend the processing. |
| 8.7 | Withdrawal of consent | If you have given a consent to Company to collect, use and/or disclose your Personal Data (whether before or after the effective date of PDPA), you have the right to withdraw such consent at any time throughout the retention period, unless it is restricted by laws or any legal basis. However, exercising of the right of withdrawal does not affect any activities that Company already processed prior to the date of exercising such right. |
| 8.8 | Complaint Lodging | You may raise the complain to Personal Data Protection Committee pursuant to relevant laws if you believe that the collection, use and/or disclosure of your Personal Data is violating or not in compliance with relevant laws. |

Exercising of your right as mentioned above may be restricted under PDPA and any laws governing insurance business and in some case Company may deny or not be able to carry out pursuant to your request with some reason, for instance; complying with laws or court orders, public interest, your request resulting in a breach of others' rights, etc. Nevertheless, if Company denies your request, Company will inform you the reason. Prior to complying with your request, Company needs to process appropriate methods to verify you.

Please note that whether you desire to exercise the right according to 8.4 to 8.7 may result to ability of Company to completely make transactions, enter into insurance contract, claim services, provide appropriate services, comply relevant laws by you and/or Company, etc. For your benefits, please learn and ask for consequences of exercise the right prior to exercising. However, if you desire to exercise your right, please contact Company or find the request form on our website <http://www.sompo.co.th>.

9. Contact information

If you have any suggestions or inquiries regarding this Policy or desire to exercise your right under PDPA, please contact via the following channel:

Sompo Insurance (Thailand) Plc.

990 Abdulrahim Place, 12th, 14th Floor, Rama 4 Rd., Silom, Bangrak, Bangkok, Thailand 10500

To: The Data Protection Officer Tel. 02-119-3000, **Email: DPO@sompo.co.th**

10. Disclaimer

Company will not take any responsibilities for any loss and/or damages relating to your personal data caused by your disclosure (intentional or negligence), ignore or negligence to protect your personal data that you can handle by yourself such as, signing out from log in, not providing username/password to others, etc.

11. Change of Policy

Company will review this Policy periodically to comply with PDPA and any laws governing insurance business as well as Company's business activities, thus, preserve rights to change, amend this policy, in whole or in part, without advance notice to you. Company will upload the last amendment on <http://www.sompo.co.th>

by specifying the date of amendment on it. You can check by yourself all the time as you need. Company will not inform you individually about such amendment.

This Privacy policy is amended and effective on 1th June 2022