

Privacy Notice

Sompo Insurance (Thailand) PCL. (“Company”) has objectives to collect, use, disclose (collectively called “process”) your personal data under the objectives specified herein prior and after the execution date of Personal Data Protection Act B.E. 2562 and relevant regulations (“PDPA”), For compliance with PDPA, Company would like to inform regarding this Company’s Privacy Notice to **current and former Customer and relevant persons as well as current and former Business partner** with following detail;

1. Definition

1.1 “Personal data” means 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

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, 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. and 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 person, 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, 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 making 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 disclosing 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

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

- 3.1 To consider and recommend appropriate product/service
- 3.2 To facilitate to fill in the insurance request form and prepare relevant documents
- 3.3 To verify the identification pursuant to Know Your Customer ("KYC") and Customer Due Diligence ("CDD") process
- 3.4 To consider on underwriting when you submitted insurance request form and relevant documents
- 3.5 To make insurance contract, co-insurance contract, re/sub-insurance contract
- 3.6 To perform right or obligation under insurance contract, such as claim process, etc.
- 3.7 To arrange the statistic in order to calculation the insurance premium according to the risk appetite, to investigate or prevent insurance fraud
- 3.8 To perform financial transaction relating to insurance contract
- 3.9 To provide renewal notice and/or offer products/services including promotion of the same/similar type which you are using for your benefits.
- 3.10 To provide promotion, privilege, direct marketing and/or cross/up selling (which complying with laws) and/or take the survey for develop Company's product/service (Marketing purposes).
- 3.11 To perform legal procedure, in case of liable to third-party or subrogation
- 3.12 Internal data management such as database, comply data subject's request under PDPA
- 3.13 To Maintain relationship, e.g. contact, complaint handling, satisfactory survey, etc.
- 3.14 To share to the Company's affiliates and/or related companies of the Sompo Group, agents, contractors, reinsurers associations or third-party service providers who provides administrative, telecommunications, payment, data processing or other services relating to business operation of Company.
- 3.15 To processes personal data for OIC according to details mentioned on OIC's Privacy Notice in www.oic.or.th

- 3.16 To cooperation or comply with relevant laws and regulations or the order of regulator, government sector or association/entity relating to insurance business
- 3.17 Any process regarding the objectives specified herein

Company needs to collect, use, disclose your personal data as **Business partner** under the following objectives;

- 3.18 To verify the identification pursuant to KYC and CDD
- 3.19 To verify your identification and authority prior to entering into contract
- 3.20 To comply with terms and conditions specified on each agreement between Company and party
- 3.21 To Maintain relationship with Business partner, e.g. contact, satisfactory survey, award, etc.
- 3.22 To process personal data for any purposes pursuant to laws and/or regulations or authorities' order
- 3.23 Any process regarding the objectives specified herein

Company will collect, use, disclose your personal data based on legal basis specified 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 other persons except for the following cases;

- 4.1 Authorities governing Company, for instance, OIC, Anti-Money Laundering Office, Revenue Department, etc. to comply with laws and regulations.
- 4.2 Associations relating to insurance business, for instance, TGIA, The Federation of Thai Industries for the purpose of analyzing the statistic, and provide suggestion.
- 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

5. Transfer of Personal Data

Company will not transfer your personal data to others except of transferring according to the order of law/authorities or to Company's affiliates both in Thailand and across countries or service provider 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 which secure your transferred personal data 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 from court of justice or authorities or having a lawful basis.

6. Retention period of Personal Data

Company collects and continue retaining the received personal data from the receipt date by implementing suitable measures to protect collecting, using, disclosing, copying, adjusting, transferring, erasing, deleting or any risks without authority and/or illegal within retention period. Including any updated data 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. Right of the Data Subject

As of the date 1th June 2022 onwards, you have rights as specified on PDPA as follows;

- 7.1 Right of Access: To access your Personal Data, or obtain a copy of your Personal Data
- 7.2 Right to Data Portability: To receive the personal data / request to transfer to the third party except technical inability.

- 7.3 Right to Rectification: To request that your Personal Data be updated, corrected, completed, and not cause any misleading
- 7.4 Right to Object: To object the collection and processing of Personal Data according to laws.
- 7.5 Right to Erasure: To request that your Personal Data be deleted, destroyed or de-identified
- 7.6 Right to Suspension: To request the suspension of the processing of your Personal Data
- 7.7 Right to Withdrawal: To withdraw the consent which has already been given. However, such withdrawal shall not affect the collection, use or disclosure which you have lawfully given consent prior to such withdrawal; and
- 7.8 Right to Lodge Complaint: To lodge complaint to the competent personal data protection authority

However, exercising of your right as mentioned above may be restricted under laws and if you desire to exercise the right according to 7.4 to 7.7 may result to ability of Company to make underwriting, claim consideration, insurance service and/or any services to you. If you desire to exercise your right, please contact Company or find the request form on our website. Prior to complying with your request, Company will process appropriate methods to verify you.

8. 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 such as, not logging out from log in, providing username/password to others, etc.

9. Contact information

If you have any suggestions or inquiries regarding collection, usage and/or disclosure of your personal data as well as a request to exercise your rights under PDPA, you may 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**

This Notice is amended and effective on 1th June 2022

Remark: 1. Company preserves rights to change, amend this privacy notice 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.

2. For more information on Privacy Policy, please access to <https://www.sompo.co.th/home/privacy-center/privacy-policy-1.html>