

## **Personal Data Privacy Policy for Non-life Insurance Agents and Brokers**

### **Dhipaya Insurance Public Company Limited**

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Dhipaya Insurance Public Company Limited (the “**Company**”) is aware of the importance of privacy and its responsibilities relating to the collection, use, and disclosure of (“**processing**” or “**to process**”) your personal data. The Company, therefore, issues this Personal Data Privacy Policy (the “**Policy**”) to describe the details of the processing of your personal data, as prescribed in the Personal Data Protection Act B.E. 2562 (2019) (the “**Personal Data Protection Act**”) as follows.

#### **1. Scope of Application**

This Policy applies to non-life insurance agents and brokers, whether natural persons or juristic persons. The scope of this application is limited to the case in which you act for or on behalf of a juristic person, and includes persons who are related to being a non-life insurance agent or broker of the Company, namely, the guarantor, and shall include the process from the application for a non-life insurance agent or broker of the Company to the end of the term of the non-life insurance agency or brokerage, or from the commencement to the expiration of contracts with the Company, as the case may be.

#### **2. Definitions**

“**personal data**” means any information that can be used to identify a natural person, directly or indirectly, but shall not include, in particular, any information about deceased persons.

“**sensitive personal data**” means the personal data as specified in Section 26 of the Personal Data Protection Act, and other applicable laws and regulations, as well as personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities, trade union information, genetic data, biometric data, or any other data that may affect the data subject in the same manner, as prescribed and notified by the Personal Data Protection Committee.

“**Personal Data Protection Act**” means the Personal Data Protection Act B.E. 2562 (2019), including any notifications, rules, regulations, or secondary legislation issued by virtue of the Personal Data Protection Act, and any amendments thereto from time to time.

“**Committee**” means the Personal Data Protection Committee.

### **3. What type of personal data is collected?**

The personal data that the Company collects consist of the following:

#### **3.1 In the case of non-life insurance agents or brokers who are natural persons:**

- (1) Data that can be used to identify a natural person, for example: names, surnames, dates of birth, age, religions, tax identification numbers, identification card numbers, issue date, signatures, photographs;
- (2) Contact information, for example: email addresses, telephone numbers, Line identification, addresses on identification cards, contact addresses, and mailing addresses;
- (3) Data concerning qualifications and work experience, for example: the highest educational degrees obtained, educational institutions, and current occupations;
- (4) Data concerning a non-life insurance agent license or a non-life insurance broker license, for example: license numbers, expiration date of licenses;
- (5) Data concerning experience of working as a non-life insurance agent or broker, for example: data concerning the offering of insurance products, performance appraisals, rewards received, records of complaints, records of investigations, suspension of licenses, and disciplinary actions, as well as any inspection and risk assessment;
- (6) Data concerning benefits and payments received, for example: details of commission, consideration, and other benefits received;
- (7) Financial data, for example; bank account numbers, bank account names, etc.;
- (8) Data in the applications for a non-life insurance agent or broker, for example: photographs, photocopies of identification cards, photocopies of house registrations, photocopies of non-life insurance agent licenses or non-life insurance broker licenses, photocopies of bank accounts passbooks;
- (9) Data concerning your uses of the Company's platforms or website, for example: user names, passwords, application status;
- (10) Any record of bankruptcy, money laundering, terrorism financing.

#### **3.2 In the case that you act for or on behalf of a juristic person:**

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In the case that a contracting party of the Company is a juristic person, namely, a juristic person broker, the Company will process your personal data in your capacity as employee, contractor, or authorized person of the juristic person:

- (1) Data that is used to identify persons, for example: names, surnames, identification card numbers, signatures, and data that appears on identification cards, photocopies of passports, or personal documents;
- (2) Your data that appears in the affidavit, lists of shareholders, introduction letters, photocopies of non-life insurance broker license, partnership and company registration documents, memoranda of associations, value added tax registration certificate, photocopies of bank accounts or any other documents relating to the juristic person containing your personal data;
- (3) Any record of bankruptcy, money laundering, terrorism financing;
- (4) Any other information that we request from the juristic person or from you in support of the entering into contracts, or taking any act in relation to contracts between the Company and the juristic person.

In this regard, if you take any act relating to offering insurance products or acting as a non-life insurance agent or a non-life insurance broker, we will process your personal data in accordance with the details in Clause 3.1, in the case that you act on your own behalf.

### **3.3 In the case of a guarantor**

- (1) Data that are used to identify persons, for example: names, surnames, ages, citizenship, identification card numbers, government officer identification card numbers, occupations, signatures;
- (2) Contact information, for example: telephone numbers and addresses;
- (3) Data on the documents in support of the entering into guarantee contracts, for example: photocopies of identification cards, photocopies of bank books, photocopies of house registrations, photocopies of identification cards of government servants or state enterprise employees, and employment certification letters from the relevant agencies.

The personal data stated above in each case is necessary for the entering into contracts with the Company and the performance of contracts by the Company. If you do not provide the Company with this personal data, the Company will not be able to consider your personal data and enter into contracts with you. In the case that such data is necessary for complying with the law and you do not provide the Company with your personal data, the Company will not be able to take any act in relation to those matters or comply with the provisions of law.

In collecting photocopies of identification cards, the Company does not have any intention to collect any sensitive data that appears on identification cards, for example: religion

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and/or blood type (if any). Therefore, before providing or disclosing photocopies of your identification cards to the Company, you are requested to redact any such sensitive data. If such sensitive data is not redacted, the Company will redact it itself. In this regard, the Company hereby confirms that it does not have any intention to act in bad faith or to commit any criminal offense and that the Company only collects personal data as necessary and as prescribed in the Personal Data Protection Act.

In the case that you provide the Company with the personal data of another person, for example: guarantors, you are required to take any act to inform the data subjects of the details of the processing of personal data under this Policy, and also to take any necessary act, for example: to obtain consent, if necessary, from data subjects, to ensure that such disclosure of personal data by you and the processing of personal data by the Company are in compliance with the law.

#### **4. How is personal data collected?**

In general, the Company will collect your personal data directly upon your application for a non-life insurance agent or broker of the Company. However, the Company may collect your data from other sources, for example: public data sources, data sources relating to your business or commercial data sources, etc.

#### **5. Purposes of the Processing of Personal Data**

Your personal data will be processed for the following purposes:

- (1) **In the case of non-life insurance agents or brokers who are natural persons:**

<b>Personal Data Processing Basis</b>	<b>Personal Data Processing Activities</b>
<b>It is necessary to comply with the requests of data subject prior to entering into a contract.</b>	<ul style="list-style-type: none"><li>- Consideration of application for a non-life insurance agent or broker.</li><li>- Entering into a non-life insurance agency or brokerage contract.</li></ul>
<b>It is necessary for the performance of a contract.</b>	<ul style="list-style-type: none"><li>- Exercising of the rights and duties under the contracts between the Company and a non-life insurance agent or broker.</li><li>- Making payments of consideration, commission or other benefits as agreed.</li></ul>

Personal Data Processing Basis	Personal Data Processing Activities
<b>It is necessary for the legitimate interests of the Company or the related parties.</b>	<ul style="list-style-type: none"><li>- Application for a non-life insurance agent and broker.</li><li>- Verification and authentication of identity.</li><li>- Historical check, both before and during acting as a non-life insurance agent or broker for the Company, including the monitoring of any fraudulence or corruption.</li><li>- Management and administration of the non-life insurance agents and brokers of the Company, manpower planning, payments of benefits or calculation of payments or rewards.</li><li>- Trainings or other activities that are beneficial to non-life insurance agents and brokers.</li><li>- Evaluation of performance of non-life insurance agents or brokers.</li><li>- Preparing reports or auditing the operation of the Company, either by internal audit or external audit.</li><li>- Analysis of data on the offering of insurance products.</li><li>- For the purposes of communications of any means and any channels.</li><li>- Conducting surveys, collecting statistical data, or conducting researches on offering insurance products.</li><li>- Investigation of complaints and issues concerning improper conducts or disciplinary action procedures.</li><li>- General administration of the Company, and recording data of non-life insurance agents or brokers in taking out insurance and for avoiding any conflict of interest or any possibility of conflict of interest.</li><li>- Management of information, e.g., for the purpose of managing, storing, recording, backing up, or destroying personal data.</li><li>- Complying with the guidelines or practices in the industry specified by the associations or organization in the insurance business sector;</li><li>- Restructuring the Company to restructure the organization and to enter into transactions of the Company, as well as buying or selling any part of the business of the Company (if applicable).</li></ul>

Personal Data Processing Basis	Personal Data Processing Activities
	- Complying with the laws of other jurisdictions (if applicable).
<b>It is necessary to comply with the law.</b>	<ul style="list-style-type: none"><li>- To comply with the laws applicable to the operation of the insurance business of the Company.</li><li>- To comply with the orders, notifications, regulations, and rules issued by government agencies or regulatory authorities, for example: the Office of the Insurance Commission (OIC), the Anti-Money Laundering Office, and the Royal Thai Police.</li><li>- To comply with any order of the court or any other judiciary organizations.</li></ul>
<b>It is necessary to create and take any act in relation to the rights of claim of the Company.</b>	The Company may be required to process your personal data to create, comply, dispute, defend or take any act on its rights of claim.
<b>Consent</b>	To collect sensitive personal data that appears on identification cards.  <b>Remark:</b> As stated above, the Company has no intention to collect your sensitive personal data, as well as sensitive personal data that appears on identification cards. However, if it is necessary for the Company to collect your sensitive personal data, the Company will obtain your consent as required by law.

(2) **In the case that you act for or on behalf of a juristic person:**

Personal Data Processing Basis	Personal Data Processing Activities
<b>It is necessary for the legitimate interests of the Company or the related parties.</b>	<ul style="list-style-type: none"><li>- Verification and authentication of identity.</li><li>- Verification of the juristic person for which you are an employee or for whom you act.</li><li>- For communications purposes.</li><li>- General administration of the Company, recording data of non-life insurance agents or brokers, for the taking out of insurance and for avoiding any conflict of interest or any possibility of conflict of interest.</li><li>- Management of information, e.g., for the purpose of managing, storing, recording, backing up, or destroying personal data.</li><li>- Restructuring the Company to restructure the organization and to enter into transactions of the Company, as well as buying or selling any part of the business of the Company (if applicable).</li><li>- Complying with the laws of other jurisdictions (if applicable).</li></ul>
<b>It is necessary to comply with the law.</b>	<ul style="list-style-type: none"><li>- To comply with the laws applicable to the operation of the insurance business of the Company.</li><li>- To comply with the orders, notifications, regulations, and rules issued by government agencies or regulatory authorities, for example: the Office of the Insurance Commission (OIC), the Anti-Money Laundering Office, and the Royal Thai Police.</li><li>- To comply with any order of the court or any other judiciary organizations.</li></ul>
<b>It is necessary to create and take any act in relation to the rights of claim of the Company.</b>	The Company may be required to process your personal data to create, comply, dispute, defend or take any act on its rights of claim.
<b>Consent</b>	To collect sensitive personal data that appears on identification cards.  <b>Remark:</b> As stated above, the Company has no intention to collect your sensitive personal data, as well as sensitive personal data that appears on identification cards. However, if it is

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Personal Data Processing Basis	Personal Data Processing Activities
	necessary for the Company to collect your sensitive personal data, the Company will obtain your consent as required by law.

(3) In the case of a guarantor

Personal Data Processing Basis	Personal Data Processing Activities
<b>It is necessary for the performance of a contract.</b>	<ul style="list-style-type: none"> <li>- Exercising of the rights and duties under the contracts between the Company and the guarantor.</li> </ul>
<b>It is necessary for the legitimate interests of the Company or the related parties.</b>	<ul style="list-style-type: none"> <li>- Verification and authentication of identity.</li> <li>- For communications purposes.</li> <li>- General administration of the Company, recording data of non-life insurance agents or brokers, for taking out insurance and for avoiding any conflict of interest or any possibility of a conflict of interest.</li> <li>- Management of information, e.g., for the purpose of managing, storing, recording, backing up, or destroying personal data.</li> <li>- Restructuring the Company to restructure the organization and to enter into transactions of the Company, as well as buying or selling any part of the business of the Company (if applicable).</li> <li>- Complying with the laws of other jurisdictions (if applicable).</li> </ul>
<b>It is necessary to comply with the law.</b>	<ul style="list-style-type: none"> <li>- To comply with the laws applicable to the operation of the insurance business of the Company.</li> <li>- To comply with the orders, notifications, regulations, and rules issued by government agencies or regulatory authorities, for example: the Office of the Insurance Commission (OIC), the Anti-Money Laundering Office, and the Royal Thai Police.</li> <li>- To comply with any order of the court or any other judiciary organizations.</li> </ul>



Personal Data Processing Basis	Personal Data Processing Activities
<b>It is necessary to create and take any act in relation to the rights of claim of the Company.</b>	- The Company may be required to process your personal data to create, comply, dispute, defend or take any act on its rights of claim.
<b>Consent</b>	To collect sensitive personal data that appears on identification cards.  <b>Remark:</b> As stated above, the Company has no intention to collect your sensitive personal data, nor any sensitive personal data that appears on identification cards. However, if it is necessary for the Company to collect your sensitive personal data, the Company will obtain your consent as required by law.

#### 6. Who will receive your personal data from the Company?

The Company may disclose, send, or transfer your personal data to the following persons:

- (1) Independent advisors or experts, for example: legal advisors, accounting consultants, auditors, or other advisors.
- (2) Third party service providers of the Company (including their subcontractors), for example: providers of insurance-related services, for example: issuing insurance policies, technological services, cloud services, outsourcing of manpower, goods storage or documents storage and document services, data recording services, mail services, parcel delivery services, data analysis services, marketing services, research services or other services related to the business operation of the Company;
- (3) Insurance-related organizations, e.g., the Thai General Insurance Association;
- (4) Government agencies and judiciary organizations, for example: the Office of the Insurance Commission (OIC), the Royal Thai Police, the Department of Legal Execution, law courts, and the Office of the Personal Data Protection Committee;
- (5) Any person who enters or will enter into transactions with the Company and your personal data may be a part of any purchase or sale or a part of any offer to purchase or offer to sell of the business of the Company (if applicable);

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- (6) Any persons to whom you have given your consent to disclose your personal data.

## **7. Cross-border personal data transfer**

In general, the Company does not transfer any personal data abroad. However, if it is necessary for the Company to undertake such a transfer, the Company will take all appropriate acts to protect your personal data in compliance with the law.

## **8. Retention of personal data**

We shall retain your personal data to the extent it is necessary to achieve the purpose of its process, but it shall be no longer than a period of 10 years from the end of your relationship or the last contact with the Company. The Company may retain your personal data for a longer period as specified if it is permissible by law or if it is a duty of the Company.

The Company will take reasonable steps to erase or destroy or anonymize your personal data so that it is no longer identifiable for the retention period of personal data above.

## **9. Your rights relating to your personal data**

You have rights in respect of your personal data under the Personal Data Protection Act as follows:

- (1) **Right to access:** You have the right to check whether or not the Company has any data relating to you, and the right to access or obtain a copy of your personal data that is under the responsibility of the Company, and to request the disclosure of the source of your personal data in the case that the personal data has been collected from other sources.
- (2) **Right to rectification:** You have the right to request the Company to rectify any personal data pertaining to you.
- (3) **Right to erase or destroy:** You have the right to request the Company to have your personal data erased, destroyed or anonymized so that it can no longer be identifiable. The procedures for erasure, destruction, or anonymizing personal data so that it can no longer be identifiable shall be specified by the Company and will be in compliance with the law.
- (4) **Right to object to processing:** You have the right to object to the Company's processing your personal data in the case that the Company's processing of your personal data was without your consent, or in the case of direct marketing.

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- (5) **Right to restrict processing:** You have the right to restrict the processing of personal data pending the Company's consideration of any act according to your right, or if you wish to restrict the processing of personal data instead of erasing or destroying it.
- (6) **Right to data portability:** You have the right to request the Company to transfer your personal data, in a format that is readable or commonly used by way of automatic equipment, to other controllers, and to receive such data (in the case that the Company has made the personal data available in such format).
- (7) **Right to file complaints:** You have the right to file complaints to the Office of the Personal Data Protection Committee with respect to the processing of personal data by the Company in following the procedures in accordance with the law.

The Company reserves the right to decline any request to exercise the right by data subjects as it deems appropriate and in accordance with the law.

In the case that it is permissible under the law, you may be subject to payment of reasonable expenses incurred in connection with the Company's taking any act on your request to exercise of a data subject, provided that the Company shall inform you prior to undertaking any act which incurs expenses.

## **10. Amendment to this Policy**

The Company reserves the right to make any amendment, addition, change, improvement, or adjustment to the Policy, to the extent permissible under the law. In the case of any material change to this Policy, the Company shall inform you of any such amendment, addition, change, improvement, or adjustment and/or may obtain your consent (if such consent is required by law).

## **11. Contact Channels**

If you have any question relating to any part of this Personal Data Privacy Policy or require additional information relating to the Company's guidelines in protecting your personal data, or if you would like to exercise the right as data subject, please contact us at:

### **Details of the Company**

Name: Dhipaya Insurance Public Company Limited

Address: 1115, Rama 3 Road, Chong Nonsi, Yannawa, Bangkok 10120.

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Telephone No.: 1736 (Monday-Friday: 8.30 - 16.30)

**Details of the Data Protection Officer (DPO)**

Data Protection Officer of Dhipaya Insurance Public Company Limited

Address: 1115, Rama 3 Road, Chong Nonsi, Yannawa, Bangkok 10120.

Contact Channel: [TIP-DPO@dhipaya.co.th](mailto:TIP-DPO@dhipaya.co.th)