

Privacy Policy

Tokio Marine Safety Insurance (Thailand) PCL.

Tokio Marine Safety Insurance (Thailand) PCL. (“Company”) realized the importance of privacy rights and it is our responsibility to safely collect, use and disclose (collectively as “Processing personal Information”) your personal information. The objective of this policy is to inform you regarding how company process your personal information in accordance with the Personal Data Protection Act B.E. 2562 (“PDPA”). The company strongly recommend you to study and understand this policy thoroughly to acknowledge your rights as a data subject of your personal information.

1. Definition

“Personal Information”	means	Any information relating to a person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons in particular and not including juristic person information.
“Data Subject”	means	A person whom the personal information identifies to but not including juristic person.
“Sensitive Data”	means	Information which stated in Section 26 of Personal Data Protection Act and the amendments and other relating laws and regulations including information regarding racial, ethnic origin, political views, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or other data which may affect the data subject in the same manner.
“Personal Data Protection Act – PDPA”	means	Personal Data Protection Act B. E. 2562 including subordinate laws which published under Personal Data Protection Act and its amendments.
“Business Partner”	means	Individual person or Juristic person who sales goods or provides services to the Company including subcontractor of them.

2. Respecting the Personal Rights of the Data Subject

The company respect and realize the importance of your personal rights and protecting your personal information and as a customer, you would expect the company to protect safety of your personal information while using our services.

Your personal information that the company received which can identify yourselves is complete and updated and will be used under the purpose under the company's objectives as informed to you before the company collect such information. The company will take highest measures to keep safe and protect your personal information and will prevent them from unauthorized uses other than for the purpose which has been previously informed you.

3. Collecting of Personal Information

3.1 Which kind information that the company collect?

The company collect personal information which may include your sensitive data as following:

1) General Personal Information

(1) **Your general personal information**, for example, name, last name, ID card number, date of birth, age, occupation, gender, marital status, photo, telephone number, mobile phone number, registered address, address for postal, passport number, email, voice conversation recording, and other contact information.

(2) **Your work information**, for example, position, workplace, your career history which may include name and address of your employer.

(3) **Your financial information**, for example, income, source of income, bank account number, tax information, bank statement, loan information, investment information, credit card information and other information regarding payment.

(4) **Product and/or service information** namely product or service information which you bought from the company or other insurance provider, for example, policy number, sum-insured, the changed or any transaction made to the policy, premium payment method, payment history, or loan information, beneficiary, claim including usage of rights under the insurance policy or product or other services from the company or other insurance provider.

(5) **Legal status**, for example, status according to the money laundering law or financing terrorism, bankruptcy, status according to Foreign Account Tax Compliance Act: FATCA

(6) **Technical information and your personal preferences** When you access to our website or application which may including other social media platform provider, for example, social media username, IP address, cookies, type and version of browser, location and region of browser plug-in, operating system and platform, user profile, accessory information including mobile accessory, wireless network, and general network.

(7) **VDO, photo and property photo** (for example your vehicle) when you enter our security area in the building which recording through CCTV

2) Sensitive Personal Data

It is necessary for the company to collect your sensitive personal data such as health history, medical history as the company need them for underwriting process as well as provide our service and claim payment or proceeding in accordance to relating regulations. If you refuse to provide the company this information, the company may not be able to provide any of our service.

Furthermore, the company collect only necessary documents for each type of insurance product for the purpose of underwriting, premium adjustment, claim payment and other purposes which stated in this policy, which include but not limited to following:

1. General policy information, for example, quotation number, policy number, condition of insurance coverage, premium, insured history with other insurance provider, financial record, or credit record.
2. Information which necessary for health and accident insurance such as weight and height, medical history, smoking, alcohol, or other drug usage.
3. Information which necessary for assets insurance such as vehicle information (value of the vehicle, chassis number, license plate number, type and qualification of the vehicle, owner status or lessee or lessor), asset information (value of the building or other property, address or coordinates, resident information, type of usage, period of usage), golf information (model, quantity, and price of golf club) or another asset information which the company insured.
4. Information which necessary for travel insurance such as destination, arrival date, and departure date.
5. Information for claim such as previous claim record, present claim with other insurance provider, accident information, sickness, the damages to the asset, golf information.

3.2 When do the company collect your personal information?

The company may collect your personal information from these following sources:

1. When you have intention to purchase or use our insurance including other services (“product” or “service”) and/ or when you access to our website or application and/ or services online.
2. When you send documents or insurance application form or when you provide your information to the company while considering of purchasing or using our products or services.
3. When you contact the company in notwithstanding by written or verbal and whoever contact first.

4. When you submit the request to change or upgrade to your purchased products or services or other requests made to your purchased products or services including requests our products or services.
5. When you contact our personnel, officers, sales representatives, agents, brokers, contractors, business partners, service providers, attorney-in-fact, or other person or section which relating to the company (collectively as “personnel and business partners”) through our website, application, social media, phone, email, face-to-face meeting, interview, SMS, Fax, postal or other channels.
6. When the company receive a recommendation about you or when the company collect your personal information from our employees and/ or business partners.
7. When you send your personal information the company to participate in marketing activity, awards, lucky draw, event, or contest held by the company and/ or our personnel and our business partners.
8. When the company receive your personal information from third party which including but not limited to public sources, personal sources, or commercial sources, website, social network sources, data providers, medical sources, healthcare providers, hospitals, doctors, other insurance providers, associations whom relating to your purchased products or services, application for your purchased products or services, complaint regarding our products and services (“third party sources”).
9. When the company receive your personal information from third party for the purpose of compliance with the regulations, for example, the company may receive your personal information from The Office of Insurance Commission (OIC).
10. When you send personal information, which relating to third party to the company (the third party is including but not limited to insured, family members, premium payer, or beneficiary), you have certified the correction and completeness of such information and certified that you have informed the data subject regarding the usage of the personal information in accordance with this policy.
11. When you contact the company at our head office or branch office, by CCTV recording inside and outside of the building and including, visitor registration before entering the building.

4. Purpose of Processing Personal Information

The company will process your personal information under these following purposes:

1) For the purpose regarding the insurance contract and other proceeding according to the insurance contract, namely

(a) For offering, providing, managing, and proceeding according to the procedures to provide insurance products or services to you.

(b) For following procedures or complete the services or providing our products and recommending your suitable products. For following procedures regarding insurance application, managing our purchased product, underwriting, collecting premium and remaining payment, investigation, analysis, process, and claim payment under your insurance policy, renewal,

amendment and cancel your policy and using any rights under your insurance policy, receiving any rights (if any).

- 2) **For managing our insurance product** such as new insurance product/ service design or amending the existing products and/or services including reinsurance.
- 3) **For communication with you** including communicate regarding products or other account with the company. For technical support for our website or application, or to communicate about the amendment of this policy which the company may have in the future.
- 4) **For analyzing and statistic reports** such as marketing research, highly information analysis, statistic research or actuarial, report or financial evaluation by company, group companies, personnel or business partners or another regulator.
- 5) **To prevent from fraud** such as to investigate or prevent any fraudulent act, concealing the truth and any other wrongful act notwithstanding that it is a confirmed or only suspicion, especially, for communication with other companies in financial service or insurance provider and relating regulators.
- 6) **To adjust the company's structure**, for the purpose of adjusting the company's structure and for company's transaction which including purchasing or selling parts of the company (if any).
- 7) **For communication service through electronics channel**, for example, for you to access the content in our website, application, or social media platform, or specific service. The company may analyze your behavior while using our website, application or social media platform and understand your preference for developing website, application or social media platform or our products and/ or services, for resolving problems, products and/ or service suggestion and advertisement on our website, application or other channels according to the target.
- 8) **For regulatory and internal policy compliance, namely**
 - (a) For regulatory compliance and our business inspection whether from internal and external or from regulators.
 - (b) For proceeding in accordance to regulations or policies which stipulated by governing regulators who responsible for law enforcement, governmental dispute resolution or insurance regulator.
 - (c) For law enforcement purpose or assisting, cooperating, investigating by the company or police officer or government officer or other domestic regulator, reporting according to the regulations or as agree with regulators domestically or as ordered by the government officers or sectors.
 - (d) For proceeding in accordance with company's internal rules.
- 9) **For information management**, namely, for the purpose of managing, recording and disposing of personal information.
- 10) **For product and service development** including inspecting and quality improvement including training when communicating with the company.

- 11) For security purpose** inside the head office and branch office for safety of employees and company's assets including for your safety.
- 12) For marketing activities** including products and services information which suitable to you, service suggestion which including insurance and other marketing activities such as award program, benefits, or exclusive loyalty program, charity program and events which you participate in.
In such case, the company will proceed when the company obtain your prior consent only and you are able to withdraw your consent for processing your personal information for marketing activities through the channels which stated in this policy.
- 13) To collect, use and/or disclose personal information to The Office of Insurance Commission (OIC)** for supervise and support insurance business conduct in accordance with Insurance Commission laws and non-life insurance laws as prescribed by Data Privacy Policy of OIC which published on OIC's website (<https://www.oic.or.th>)
- 14) Other;** for other purposes which relating to the above purposes.

You may choose not to give consent to the company to process your personal information, however, please note that if you not provide some certain information, you may not be able to provide you services or response to your request such as the company may not be able to proceed your insurance contract or provide our service to you notwithstanding products or services or claim payment.

Unless stipulated by regulations or Personal Data Protection Act, the company will obtain your consent prior to processing your personal information for the purposes other than specify in this policy or relating to the purposes under this policy.

5. Disclosing your Personal Information to Third Party

In order to carry out the above purposes, the company may have to disclose your personal information to third party as stated below. The company will take any necessary measures to protect your personal information according to Personal Data Protection Act or other relation regulations which relating to personal data protection.

- 1) Business partner, or third party which relating to insurance offering such as bank, financial institution, car marker and car dealer.
- 2) Policyholder, in case of group insurance.
- 3) Person who persuade, advice, offering to sale, sale products or services by the company such as agents, brokers, including employees of juristic brokers.
- 4) Employees and business partners which provide service regarding to personal information processing, such as, business management service, payment service, debt collector, communication service, technology service, cloud service, outsourcing service, call center service, document and information management, document recording, scan service, postal service, printing service, delivering service, information analyzing service, marketing service, research service, emergency management service, or other service which relating to insurance business or our company's business.
- 5) Claim service provider such as surveyor, garage, car dealer, hospital.

- 6) Other insurance provider
- 7) Insurance association
- 8) Law enforcement regulator, commission which established by law, government sector or regulators, dispute resolution or other party which the company or group company require to disclose information (a) according to the laws or regulations in Thailand and may include government sectors which the group company located or (b) according to agreement or corporate rules between the company and government sectors or other relating parties.
- 9) Group companies
- 10) Company's adviser such as lawyer, doctor, auditor or consultant.
- 11) Personnel or sector which you consent the company to disclose your personal information to.
- 12) A person who enter into or will enter into any transaction with the company which your personal information may be part of purchasing or selling or offering to purchase or sale the company's business. (If any)

The company will disclose your personal information according to the above purposes under the consent of the data subject or under regulations unless exception by law.

6. Disclosing your Personal Information Outside of Thailand

Your personal information may be disclose, storage or process by the company or transfer to external parties which may provide service inside or outside of Thailand. However, your personal information will be transfer in accordance with Personal Data Protection Act. If the transfer is between our group companies, the company will proceed in accordance with the Binding Corporate Rules which has been approved by Personal Data Protection Commission.

7. Retention of Personal Information

The company will retain your personal information as necessary for proceeding in accordance with our purposes as aforementioned. However, the company will retain your personal information no longer than 10 years since the last date you have any transaction or contact with the company. The company may retain your personal information longer than 10 years if it is stipulated by laws. The company will take necessary measures in order to delete or dispose or anonymize your personal information in accordance with the retention period.

8. Security Measures and Data Quality

- 1) The company recognize the importance of maintaining the security of data subject personal data. Therefore, the company have established measures to maintain the security of personal data appropriately and consistency, and make Data Subject's personal data confidential to prevent loss, access, destruction, use, conversion, modify or disclosure of personal data without rights or unlawful in accordance with the Information Security Policy.
- 2) Any personal information that the Company received from data subject such as name, address, telephone number and identification card number which is complete and up-to-

date relating to an identified or identifiable of data subject will be used in accordance with the objectives of the Company. The Company will carry out appropriate measures to protect data subject's rights.

9. Rights of Data Subject

You may exercise your rights regarding your personal information as following:

- 1) Withdraw or request to change the scope of consent which you have given to the company.
- 2) Verify your personal information which stored with the company including request to access or copy your personal information and/ or access to the information to know how the company process your personal information.
- 3) Correct your personal information.
- 4) Delete or dispose your personal information
- 5) Restrict the processing of your personal information
- 6) Transfer your personal information
- 7) Temporary restrain processing of your personal information

The company reserve the right to not following your request under our discretion and in accordance with the laws. You may file a complaint to the Personal Information Commission as procedures provided in the Personal Protection Act. Furthermore, the company may collect fees for processing your request as the company see suitable.

If you would like to exercise your personal information rights, you can ask for Request to Exercise Personal Information Rights Form at our office and branch offices or download from our website at www.tokiomarine.com/th The company will consider your request and return the result to you within 30 days after the company received your request.

10. Data Protection Officer

According to Personal Data Protection Act, the company have appointed Data Protection Officer: DPO for monitoring the company's in collecting, use and dispose of personal information in accordance with Personal Data Protection Act B.E. 2562 and related regulations and receive and precede data subject's request. You may submit your request at:

Data Protection Officer

Tokio Marine Safety Insurance (Thailand) PCL (Data Protection Officer)

Address: No. 302 S & A Building, 6th Floor, Silom Road, Suriyawong, Bangrak, Bangkok 10500

Tel. 02-257-8000

Email: DPO@tokiomarinesafety.co.th

11. Revision to this Policy

The company reserve our rights to amend, revise, or made any change to this policy as allow by laws. If there is majority amendment to this policy, the company will inform to you. The company reserve our rights to amend this policy without informing to you.

Request to Exercise Data Subject's Right Form

1. Data Subject's Right Details

Name..... Last Name.....

ID Card No./ Passport No..... Date of Birth.....

Address.....

Tel..... Email.....

2. Representative of Data Subject's Details

(In case of guardian of minor, guardian of an adjudged incompetent by the court, curator of an adjudged quasi incompetent by the court)

Name..... Last Name.....

ID Card No./ Passport No..... Date of Birth.....

Address.....

Tel..... Email.....

3. Details of the Request

3.1 Relationship with the Company

- | | | | |
|--|--|--|--|
| <input type="checkbox"/> Insured | <input type="checkbox"/> Beneficiary | <input type="checkbox"/> Payer of the policy | <input type="checkbox"/> Previous Customer |
| <input type="checkbox"/> Candidate | <input type="checkbox"/> Employee | <input type="checkbox"/> Ex-Employee | <input type="checkbox"/> Business Partner |
| <input type="checkbox"/> Agent/ Broker | <input type="checkbox"/> Participant of Marketing Activities | <input type="checkbox"/> Others. Please Specify..... | |

3.2 Period of Request

From..... Until.....

3.3 Rights to exercise

- ☐ Right to withdraw or request to change the scope of consent
- ☐ Right to verify your personal information and/ or request for copy of your personal information
- ☐ Right to correct or update personal information
- ☐ Right to delete or dispose personal information from our system
- ☐ Right to restrain of using or processing of your personal information
- ☐ Right to transfer your personal information
- ☐ Right to object the collection, usage and disclosure of personal information
- ☐ Other. Please specify.....

Please state your reason of exercising the right (if any)

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Request to Exercise Data Subject's Right Form

4. Supporting Documents

To ensure that the company will deliver or proceed correctly, please submit the supporting documents for identify your rights under Personal Data Protection Act. If you are not able to submit the complete identification documents, the company reserve our rights to not precede your request.

In case data subject request by himself (No.1)

☐ A copy of ID card (Thai nationality) or passport (foreigner) *with signature of certified true copy*

In case of proceeding by guardians (No.2)

☐ A copy of ID card or passport of data subject **and**

☐ A copy of ID card or passport of the representative of data subject *with signature of certified true copy* **and**

☐ A copy of birth certificate or a copy of house registration (in case that the data subject is minor) **and**

☐ A copy of evidence of guardianship appointment (guardian or curator)

5. Channels to Submit your Request Form

- Through the email of Data Protection Officer: DPO@tokiomarinesafety.co.th
- Through head office or branch office of Tokio Marine Safety Insurance (Thailand) PCL.

6. Conditions of Consideration

1. The company will inform the result to the data subject **within 30 days** after received your request and complete supporting documents.
2. The company reserve the right to refuse to complete your request, if the company considered that:
 - 1) The company have duty to store your personal information according to the laws.
 - 2) The company do not have any of your personal information.
 - 3) After verification, the company found that your request is not in accordance with the PDPA or your request is not according to laws.
 - 4) Your supporting documents are incomplete of unlawful.
3. You may receive contact from the company for additional documents request if the company see that the provided documents are not enough to process your request.

I hereby certify that I have read and understand the content and the condition of consideration and I have the rights under the Personal Data Protection Act to submit this request form. The supporting documents are true and correct. I acknowledge that the company will have to certify and identify myself and may request for more supporting documents to proceed with my request and I fully acknowledge that the company may take legal action with me if I intended to wrongfully provide false information.

Signature of Data Subject/ Representative of Data Subject

.....
(.....)

Date.....

Request to Exercise Data Subject's Right Form

For Officer

Name of Officer..... Department.....
Date of Receiving..... Date of sending the request to DPO.....