

Announcement of Personal Data Protection Policy: For Insurance Agents/Brokers

This announcement establishes the guidelines for the Company's practices regarding collection, use and disclosure of personal data in accordance with Personal Data Protection Act B.E. 2562. This announcement applies to the insurance agents/brokers of Krungthai Panich Insurance Public Company Limited ("Company"). The insurance agents/brokers kindly carefully read terms and conditions described in this announcement.

1. Definition

"Personal data" under this announcement shall mean *any information relating to a person, which enables the identification of such person, whether directly or indirectly, including but not limited to the name, ID card number, address, online information, physical, mental, social, economic and cultural identity information, or any information enabling identification.*

2. Data collected by the Company

2.1 Data of insurance agents/brokers

As a part of the job application as an insurance agent/representative and compliance with the insurance agent/representative contract, the Company needs to collect, use and disclose your personal data, including but not limited to:

- Name – surname
- Address, house registration, residence detail
- ID card or passport
- Telephone number
- Mobile number
- E-mail
- Educational institution, educational background
- Work experience
- All supporting data for job application as an insurance agent/representative, such as license of insurance agent/representative, etc.
- Personal profile/work experience indicated in your CV
- Details of work permit (In case of foreign insurance agent/representative)
- Criminal record
- Past and current work profile including information of the past or current employer, workplace, address of workplace, working days and time, salary, work behavior, or relevant work profile, etc.

The Company may contact the reference persons indicated or mentioned by you during the job application as insurance agents/broker for verification of your work profile with the outside company or person, as necessary, to protect the Company's legitimate interests.

During the job application process as an insurance agent/representative, you may be asked to submit the additional information to the Company, as follows;

- Health information or disability
- Nationality
- Gender
- Religion or other necessary information which verifies or confirms your qualification that you can work as an insurance agent/representative for the Company, etc.

2.2 Personal data of Special category

The Company collects your personal data of special category in accordance with Section 26 of Personal Data Protection Act B. E. 2562 such as data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any similar data. The Company shall inform you of details of collection, use or disclosure of your personal data of special category prior to or during collection of your personal data in line with conditions and principles prescribed by law.

2.3 Personal data regarding law violation

You acknowledge that, in case of civil or criminal offence or violation of any law, the Company is entitled to collect or use your information regarding law violation. The Company carefully accesses, collects, discloses or controls these personal data to the extent prescribed by law.

2.4 The Company collects, processes or uses the following personal data from outsiders

You acknowledge and allow the Company to collect, process or use your personal data, including but not limited to;

- Information regarding your educational background and work profile. The Company collects, uses or processes the information of your work experience and educational background during the job application or the validity period of insurance agent/representative contract which involves different working procedures. The Company may verify the information provided by you with your former employers and educational institutions.
- Information regarding license of insurance agent/representative and/or vocational certificate and/ or educational background. The Company may need to verify the information provided by you regarding vocational certificate and/or educational background which you received from the outsider.
- Your health information: Under the scope prescribed by law, the Company may collect your health information from any hospital or clinic or your personal reference to verify your health condition in relation to duty performance in accordance with the insurance agent/representative contract or approval of any welfare which you are entitled to (if any).
- Information which the Company collected from other persons: The Company may obtain your information from other persons, possibly in the form of reports, notices or complaints in accordance with the Company's regulations or the law, to allow the Company to acknowledge the report, notice or complaint (if any) regarding you, your behavior or activity or information about your circumstances, and to proceed in accordance with the law.
- Immigration information: The Company may obtain your information from a government agency or consul such as information of ID card, passport, immigration, or other information for your trip arrangement, for benefits of the owner of personal data, or compliance with the law. The information categories may be different depending on requirements in each country.

The Company would like to inform you that, to protect and maintain the safety of the insureds and general public, and to protect the Company's interests, the Company installed surveillance cameras for the safety inside the Company. The Company or outsourcing service provider hired by the Company, may collect, use and process the data of your images or video and personal data of your use and entrance in the Company's premise.

3. Data processed by the Company

The Company processes the personal data which the Company directly collected from you or from the outsiders as specified in Clause 2, to proceed with compliance with the insurance agent/representative contract, consideration of application forms of insurance agents/brokers, or legal compliance.

The Company applies the automatic decision-making tools to process your information through the computer system, for example the Company may assess the personal data for the consideration of application forms of insurance agents/brokers, or others. You may obtain the additional information from the Company's personal data protection officers.

4. Objectives and legal basis for collection, use and disclosure of your personal data

The Company collects, uses and discloses the personal data for the following objectives:

Clause	Objectives	Legal base
4.1	To process, manage, proceed with job application as an insurance agent/representative, make the insurance agent/representative contract, make the non-life insurance agent/representative appointment contract, and make the investment advisor appointment contract or other contracts	Contractual Basis
4.2	To analyze and evaluate the work performance, payment of remuneration, commission or other rewards, as well as welfares granted by the Company for their performance in accordance with the Company's policy	
4.3	To support the disciplinary investigation, in case the Company receives the complaint about the work performance	Contractual Basis
4.4	To process, manage, proceed with the insurance claim or transactions which the owner of personal data submits to the Company, or consider the issuance of the insurance policy, proceed with and offer the services in relation to the insurance policy, collect the insurance premium and other liabilities (if any), check, analyze, process the data, pay the compensation in accordance with the insurance policy, renew, amend, cancel or extend the insurance policy of the owner of the personal data.	
4.5	To manage the Company's products or services, and help the Company to perform its obligations to the owner of personal data and deliver all relevant services as agreed with the owner of personal data who buys the product or service.	
4.6	To review or inspect the personal data which are obtained from entities or organizations such as hospitals, healthcare agencies or other entities.	
4.7	To provide the information regarding the services to the owner of personal data, and provide the following-up, coordination, problem-solving services to the owner of personal data, as it deems appropriate, for example services in relation to the insurance policy or replying to the inquiries, etc.	
4.8	To use the data to analyze, offer, provide, use and/or improve the insurance services or products, and analyze the market and organize the sales promotion activities.	Legitimate Interests
4.9	To be the basis of legal claim, comply with or exercise its right of legal claim or defend against the legal claim	Legal Obligation

Clause	Objectives	Legal base
4.10	To provide electronic communication channels, such as allowing you to access content on websites, applications, or social media platforms, or specific services, the company may process or analyze your behavior in using those websites, applications, or social media platforms in order to personalize those websites, applications, or social media platforms specifically and appropriately for you, including evaluating or implementing and improving those websites, applications, or social media platforms, or products and/or services; resolving issues; recommending related products and/or services; and advertising on websites, applications, and other channels according to the target audience	Legitimate Interests
4.11	To compile, utilize, and/or reveal personal information to OIC, for the purpose of monitoring and supporting insurance businesses according to the law concerning OIC and the law related to Non-Life Insurance according to the OIC's policy on personal information protection, please see: https://www.oic.or.th	Legal Obligation
4.12	To consider the qualifications and verify the risk level information related to insurance fraud of insurance agents/brokers through the insurance fraud database system, or there are reasonable grounds to suspect that there may be insurance fraud, on the website https://report.oic.or.th/ in accordance with the announcement of the Office of the Insurance Commission	Consent
4.13	To comply with the rules or other legal requirements	Legal Obligation
4.14	For the benefits of corporate operation	Legitimate Interests

The Company has the legitimate rights and duties to collect, use and disclose the personal data provided by you and collected by the Company prior to, during and after the termination of the insurance agent/representative contract to fulfill the contractual objectives, and to achieve the utmost benefits of the corporate operation and administration.

To comply with the law (Insurance laws or any relevant laws) the Company may collect, use and disclose the personal data of special category, including (1) information of racial or ethnic origin, religious or philosophical belief, or union membership (2) Biometric and genetic information and (3) Health information, sexual orientation. The Company processes the personal data either (1) because the Company obtains your consent for such procedure or (2) because the Company needs to collect, use and disclose your personal data to comply with the applicable laws or to protection the Company's interests.

You may ask for more information from the personal data protection officer, when the Company collects, uses and discloses your sensitive personal data. After you gave the consent, you can withdraw the consent at any time by contacting the personal data protection officer. If you withdraw the consent, the Company may still need to process the personal data to comply with the law or to protect the Company's interests. In this case, at the time of consent withdrawal, the Company shall explain to you, which personal data the Company still needs to collect or process for the purpose of law compliance.

Moreover, the Company may collect, use and disclose the personal data for other objectives in line with or similar to the above-mentioned objectives, including for the historical, statistical or scientific research, archive collection, or public interests. If possible, the Company will not use, for the above-mentioned purposes, the data which can identify the person, or the Company may follow a procedure to limit the scope of personal data which can be used for research or information backup. In addition, the Company may adopt the pseudonymous method to avoid the use of your personal data.

5. Recipients of your personal data

The Company understands the significance of adequate personal data protection. The Company tries to limit the access to the personal data to only persons required to access such data to perform their duties. The employees and personnel of the Company, affiliated companies, Company's business partners and third parties who provide the services to the Company under the contract regarding collection, use and disclosure of the personal data and other contract parties who act in the name of the Company, will receive, collect, use and disclose your personal data. The Company discloses the personal data to these companies as necessary to process the personal data, provide you the services and protect the Company's interests. The Company agrees to protect your personal data from unauthorized use, access or disclosure. You may contact the personal data protection officer to get the additional information regarding the types of service providers to whom the Company discloses your personal data. The Company may disclose your contact information in the insurance agent/representative list book provided to the Company's employees and general public. However, you are entitled to demand us to delete your personal data from the Company in accordance with the principles, conditions and time period determined by the Company.

The Company may transfer your personal data to any company or agency, such as government agencies, public agencies, agencies regulating services or agencies regulating the Company (such as Office of Insurance Commission) or organizations to which the Company is a member (such as Thai General Insurance Association) Thailand Insurance Institute or government agencies which supervise immigration, taxation, national security and crimes as prescribed by law, for the Company's business operation or joint business operation, transportation, joint event organization, profession affiliations and research.

In addition, you allow the Company to disclose or transfer your personal data to its affiliated companies or business partners for the purpose of the corporate business operation, compliance with the policy, protection of the Company's interests or legitimate rights or compliance with the announcements as determined by the Company case by case.

6. Transfer of personal data to foreign countries

The Company may transfer your personal data to foreign countries for the purpose of the corporate business operation as necessary. You agree and allow the Company to transfer your personal data outside Thailand to the person or agency located in other country or under jurisdiction of other country, whether the personal data protection law of that country meets the standard of personal data protection law of Thailand or not. The Company will follow the proper procedure of personal data protection to the same level of the personal data protection law of Thailand.

7. Data retention period

The Company collects and stores your personal data under the length of time specified by law. You can check the information regarding the retention period of your personal data with the personal data protection officer.

8. Your rights

You may exercise the following rights regarding your personal data at any time:

- Right to access your personal data held by the Company including the right to demand the Company to correct the incorrect or incomplete data.
- Right to ask for the copy of your personal data in the electronic form which you may transfer to the third party or demand the Company to directly transfer to such person.
- Right to object the processing result of your personal data for the marketing purpose or any purpose.
- Right to demand the Company to delete your personal data when they are no longer necessary according to the data collection objectives, including right to limit the scope of personal data processing, in case the Company cannot delete the data.
- Right to ask the personal data controller to suspend the use of personal data.

- Right to demand the Company to rectify the personal data to be correct, up-to-date, complete and not cause any misunderstanding.
- Right to complain to a regulatory agency in case you believe that the Company violates your right.

Furthermore, you have the right to file a complaint with the expert committee of the Personal Data Protection Board if you believe that the company's practices do not comply with the Personal Data Protection Act.

You can exercise your rights in accordance with the rules, announcements, regulations determined by the Company in line with the principles of personal data protection law, the Company's Personal Data Protection Policy and other principles determined by the Company. To exercise the above rights, you are required to submit the written complaint to the personal data protection officer of the Company according to the details in Clause 11 of this announcement. The Company shall have the sole right to consider the said complaint. The Company's decision on the exercise of your rights shall be final.

In the event that you demand the Company to delete, eliminate or restrict the collection, use, processing and disclosure of your personal data, temporarily suspend the use of your personal data, apply encryption of data whose owners cannot be identified, or you want to withdraw the consent, the Company may face some restriction regarding transaction with you or service provision to you.

9. Withdrawal of consent

If you no longer want the Company to collect, use process or disclose your personal data, you can withdraw your consent by submitting a complaint to the Company's personal data protection officer.

The withdrawal of your consent regarding personal data shall be under the conditions, rules, announcements or regulations prescribed in the personal data protection law, the Company's Personal Data Protection Policy and other regulations determined by the Company.

10. Amendment

The Company reserves its right to amend this policy due to any reason, as deemed appropriate, including for compliance with the laws, government policies, rules, announcements, regulations or other relevant restrictions. Upon any policy change, the Company shall announce such change in the Company's website at <https://pdpa.kpi.co.th/privacy>. The policy change takes effect immediately after the announcement in the website. You acknowledge and agree to comply with the amended version of Personal Data Protection Policy in any case. You should regularly revise and thoroughly read the Personal Data Protection Policy which the Company announces in the website.

11. Contact the Company

In case you want to exercise the rights in Clause 8 or have any inquiry regarding the collection, use or disclosure of personal data, please contact the company or the personal data protection officer according to the below detail.

Krungthai Panich Insurance Public Company Limited

Address 1122 KPI Tower, New Petchaburi Rd., Makkasan Sub-district, Ratchathewi District,
Bangkok 10400

Tel. KPI Contact Center 0 2624 1111

Website www.kpi.co.th

The personal data protection officer

Address 1122 KPI Tower, New Petchaburi Rd., Makkasan Sub-district, Ratchathewi District,
Bangkok 10400

E-mail dpo@kpi.co.th