



Privacy Notice  
(For Service Users)

The Viriyah Insurance Company Limited

The Viriyah Insurance Public Company Limited (“the Company”) is fully aware of the right to privacy and its responsibility for the collection, use, disclosure, (“process” or “processing”) of your personal data (“service users”) throughout your use of the website or services related to online insurance and the Company’s online transactions. As stipulated in the Personal Data Protection Act, B.E. 2562 (2019), the Company has developed a privacy notice for service users to provide information about the processing of your personal data, including details about the retention of personal data, disclosure of personal data, rights of the data subject, and customer contact channels.

This Privacy Notice explains the processing of your personal data and seeks to inform you of the purpose of collection, use, and disclosure (“processing”) of personal data, personal data retention period, as well as your data subject rights.

**Key Definitions**

“**Personal data**” refers to any information relating to a natural person that enables direct or indirect identification of such person, excluding in particular information of deceased persons.

“**Sensitive Data**” refers to information as defined in Section 26 of the Personal Data Protection Act B.E. 2562 (2019), its revised version as amended from time to time, other applicable laws and regulations, as well as any personal data pertaining to racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behaviour, criminal records, health data, disability, trade union information, genetic data, biometric data, or any data that may affect the data subject.

“**Personal Data Protection Act**” refers to the Personal Data Protection Act B.E. 2562 (2019), including secondary legislation under the Personal Data Protection Act (PDPA) and as amended from time to time.

“**Processing**” refers to any action involving personal data such as collecting, recording, copying, organizing, structuring, storing, updating, modifying, recovering, utilizing, disclosing, forwarding, disseminating, transferring, merging, deleting, and destroying, or any combination thereof.

“**Data Subject**” refers to a natural person who is the owner of the personal data processed by the Company.

“**Data Controller**” refers to a natural or legal person with the authority and responsibility to make decisions regarding the collection, use, or disclosure of personal data.

“**Data Processor**” refers to a natural or legal person who collects, uses, or discloses personal data in accordance with instructions given by or on behalf of a personal data controller.



“The Company” refers to the Viriyah Insurance Public Company Limited.

“Service User” refers to any individual who visits the website, is interested in purchasing insurance online, purchases insurance online from the website, or uses other online transaction-related services.

“Online Insurance” refers to <https://www.viriyah.co.th>, <https://www.viriyah.com>, and <https://vstore.viriyah.com>, which are websites that the Company has established to offer insurance online and promote the Company’s products, as well as serve as a communication channel between the Company and service users and also the general public.

“Website” refers to the Company-operated websites and/or mobile applications that are installed on or provide services for all types of electronic devices.

“Insurance Products” refers to the Company’s insurance policy that is available online and on the websites: <https://www.viriyah.co.th>, <https://www.viriyah.com>, and <https://vstore.viriyah.com>.

“Premium” refers to the price of the insurance products listed on the website(s), which is in Thai currency (Baht) and is subject to change without prior notice. When you purchase an insurance product, we will notify you of the amount to be paid for insurance premiums.

## Collection, Use and Disclosure of Personal Data

Concerning services related to online transactions, the Company will collect, use, and disclose personal data when you apply to use the service, buy an insurance product, or when you receive service or have used any service from the company for the purpose specified by the Company to collect, use, and disclose personal data.

## Types of Personal Data

When you visit and/or purchase insurance online, visit the website(s), or use the mobile application, including creating a new user account on the website(s) or mobile application, the following personal information will be collected:

### 1. General Personal Data

- 1.1 Personal data, such as name, surname, date of birth, marital status, gender, address, identification card or passport information, Facebook ID, Line ID, and chat history.
- 1.2 Contact information, such as e-mail, telephone number, address, social media channels, and place of employment.
- 1.3 Employment-related information, such as occupation, job title, and employment history.
- 1.4 Information regarding the purchase of insurance products and/or the provision of insurance-related services, such as insurance application forms, insurance product purchase history, claims history, and complaints.
- 1.5 Information regarding claims and accidents that occurred either prior to or after your application for coverage.



- 1.6 Financial data, such as bank account numbers, credit or debit card information, income information, other benefits, payment history, and wage.
- 1.7 Technical data and personal activities or user preferences when you use the company's website(s) and application(s). This may include data and activities on third-party social media platforms, such as the unique customer identifier used on those platforms, IP address, cookies, browser type and version, time zone setting, browser plug-in type, Operating System and platform, User Profile, device information, including information about mobile device used, wireless network information, and general network information.
- 1.8 Any information that you provide when you communicate with the Company, or when we provide after-sales service, conduct research, or conduct an interview.
- 1.9 Other information that you consent to submit to the Company, including as articles, images, animations, suggestions, and other information that is regarded as personal data under the Personal Data Protection Act.

## 2. Sensitive Personal Data

The Company collects sensitive personal data only when required, notifies data subjects of pertinent information, and requests and obtains the explicit consent of the data owner, unless the law specifies an exception.

### Consent of the Data Subject

The Company may request your consent for the collection, use, or disclosure of your personal data in order to provide you with the best possible benefits and/or to allow the Company to provide services that meet your needs in the following manner:

1. If it is necessary to collect and use your sensitive personal data, such as religious beliefs, health or blood type, and criminal record.
2. If you are a minor, an incompetent individual, or a quasi-incompetent individual, you must obtain a valid consent from your parents, guardian, curator, or legal guardian (as applicable) (except in cases where the Personal Data Protection Act allows this to be performed without consent).
3. If the data is collected from sources other than the data subject, the Company will notify the data subject without delay, but not later than thirty days from the date on which we collect personal data from such source. Unless required by law to be exempt from requesting consent or notifying the data subject, we will obtain your consent prior to collecting your personal information.
4. When transmitting or transferring personal data internationally, there may be insufficient data protection measures in place (except in cases where the Personal Data Protection Act allows this to be performed without consent).



**Disclaimer:** In the event that the Company requires identification documents such as ID cards, passports, employment history or any other documents which may contain sensitive personal data (religious beliefs, nationality, and/or blood type), the Company has neither the intention nor the need to process such data. Therefore, the data subject is required to redact these documents by crossing out or covering up any sensitive information. If you do not comply with the instructions, we reserve the right to treat the data as if it were not stored.

### Source of Personal Data

The Company may collect your personal information from the following sources:

1. **Data collected directly from the data subject**, such as when the data subject fills out a variety of online forms or communicates with the Company via specified channels.
2. **Data collected when the data subject accesses a website** and/or uses software or a mobile application in accordance with the service agreement, such as monitoring user behavior while using the company's website(s), products, or services via cookies or software installed on the device of the data subject.
3. **Data collected when the data subject accesses a website** and/or uses software or a mobile application in accordance with the service agreement, such as monitoring user behavior while using the company's website(s), products, or services via cookies or software installed on the device of the data subject.

### Objective of Personal Data Processing

The Company collects, uses, discloses, transmits, and transfers the personal data of data subjects for the following purposes:

1. **To proceed with entering into an insurance contract or its execution:**
  - 1.1 Offer for sale, sell, arrange, manage
  - 1.2 Adhere to, oversee, and complete procedures
2. **To perform the necessary actions for the Company's legitimate interests:**
  - 2.1 Manage the Company's insurance
  - 2.2 Communicate with you
  - 2.3 Prevent fraud and defalcation
  - 2.4 Restructure the Company
  - 2.5 Provide electronic communication channels
  - 2.6 Manage data
  - 2.7 Develop the Company's products and services
  - 2.8 Provide the data subject with information regarding after-sales support
  - 2.9 Put promotional strategies into action
  - 2.10 Adhere to the Company's policy



3. To analyze and prepare statistical data
4. To comply with the law:
  - 4.1 Comply with laws or the Company audits
  - 4.2 Comply with all applicable laws, rules, regulations, agreements, or policies established by the state regulatory authority
  - 4.3 Enforce the law or provide assistance, cooperation, investigation by the Company or on its behalf
  - 4.4 Support the supervision and promotion of insurance business
  - 4.5 Carry out any additional necessary actions in connection with any of the aforementioned purposes, unless applicable law and regulations, including the Personal Data Protection Act, allow otherwise, the Company will notify you and obtain your consent.

#### Disclosure of Personal Data

For the previously stated purposes, the Company may disclose your personal data to the parties listed below. We will take all measures required by the Personal Data Protection Act to protect your personal information.

1. Individuals who are partners, business partners, or third parties
2. Policyholders in relation to group insurance products
3. Individuals who invite, persuade, and suggest
4. Any personnel and business partners of the Company
5. Provider of pre-insurance service
6. Provider of indemnity service
7. Other insurance companies
8. Associations or unions in the insurance sector
9. Law enforcement agencies:
  - 9.1 As required by duty, law, or regulatory requirements in Thailand, which may include government entities in the country where the Group is headquartered.
  - 9.2 In accordance with the agreement or policy reached between the Group's companies and the government, regulatory bodies, or other affiliated parties.
10. Any company in the Group of companies
11. Corporate consultants
12. Any individual or entity to whom you consent to the disclosure of your personal information
13. Any person entering into or planning to enter into transactions with the Company in which your personal information may be part of the purchase or sale, or the offer to purchase or sell the Company's business (if any)
14. Any person or entity that is permitted by law



### International Data Transfer

Your personal data may be transferred, stored, or processed by the Company or sent to any entity or individual as described above, which may be located or provide services in or outside of Thailand. Consequently, your personal data will be transferred to other locations in accordance with the Personal Data Protection Act's personal data protection conditions. In the event of a transfer of your personal information within the Corporate Group, the Company will adhere to the Binding Corporate Rules approved by the Board of Directors (if any).

### Retention of Personal Data

The Company will retain your personal data for as long as required for the processing of such data as stated above. The Company will preserve your personal information for a maximum of ten years following the termination of your relationship with the Company or your last contact with the Company. We may retain your personal data for longer than specified if the law permits or requires us to continue doing so.

The Company will take the necessary steps to delete, destroy, or anonymize your personal data in accordance with the designated data retention period.

### Use of Personal Data for its Original Purpose

The Company has the right to collect and use your personal data that it collected prior to the effective date of the Personal Data Protection Act for the aforementioned purposes, including collection, use, and disclosure. If you no longer want the Company to collect and use such data, you may withdraw your consent by notifying us in compliance with the legal requirements outlined at <https://www.viriyah.co.th>.

### Personal Data Security and Privacy

The Company has implemented and enforced stringent internal security measures to safeguard your personal data. This includes data encryption and measures to prevent unauthorized access. The Company requires its personnel and external contractors to adhere to its standards and pertinent policies.

In addition, it is required to ensure the maintenance of the data and appropriate measures to use, transmit, or transfer your personal data in order to prevent the disclosure of this data and the unauthorized use of such data by taking the following precautions:

1. **Control access to personal data** by providing the necessary hardware to store and process the data in a secure manner.
2. **Assign rights only to those concerned or authorized** to access personal data in each responsibility imposed by the Company in accordance with the Company's organizational structure.
3. **Implement User Access Management** for access control.





4. **Determine user responsibilities** to prevent unauthorized access to personal data, disclosure, recognition, or unauthorized duplicating of personal data, and theft of equipment storing or processing the data.
5. **Carry out the Privacy Incident Management Procedure** by providing procedures to permit retrospective monitoring of access, change, deletion, or transfer of personal data in accordance with appropriate methods and media used for collecting, using, or disclosing personal data in order to promptly identify and respond to incidents involving data that are out of the ordinary.

#### Website Visitor Record (Log Files)

Log files are data files that contain information regarding computer communication and traffic. They represent the origin, source, destination, time, date, quantity, duration, service type, and any other information related to computer communications. The Company maintains a system for storing records of website access and automated email delivery, which can be linked to personally identifiable information such as IP address, websites visited before and after your visit, as well as browser type.

#### Use of Cookies

Cookies are small data files that are automatically sent to your computer's browser, laptop, tablet, smartphone, and other devices (you can disable cookies in your browser if you do not wish to accept them). Cookies are neither programs nor viruses, so they are incapable of transmitting viruses to the user's computer. The Company uses cookies to determine who visits its website and to collect geographic information and statistics about users. These statistics allow the Company to modify and create content and formats based on the preferences of site visitors.

#### Rights of Data Subjects

As the data subject of personal data, you have the following rights:

1. **The right to revoke** or request modifications to the scope of your consent to the Company.
2. **The right to request access to, obtain a copy of, or request disclosure** of the unauthorized acquisition of your personal data.
3. **The right to obtain your personal data** or to request that they be transmitted to or transferred to another data controller.
4. **The right to object to the processing of personal data** under the following circumstances:
  - 4.1 In the case of personal data that may be processed without consent since it is necessary for the public benefit or legitimate interests pursuant to Section 24 (4) or (5) of the Personal Data Protection Act, unless the Company is able to demonstrate that there are more significant legitimate grounds or that they are intended to establish a legal claim, compliance with or exercise of a legal claim, or raise the defense of legal claims;



- 4.2 Processing of personal data for direct marketing purposes;
- 4.3 Processing of personal data for the purposes of scientific, historical, or statistical research, unless it is required for the operation of the Company's public interest missions.
5. **The right to request the erasure, destruction,** or rendering of personal data as non-identifiable information, in accordance with the rules stipulated by law, for the data subject.
6. **The right to request the suspension of processing of your personal data** in accordance with legal requirements.
7. **The right to request that your personal data be rectified** so that it is accurate, current, complete, and not misleading. In the event that the Company is unable to act in accordance with your request, you have the right to demand a record of your request and the reasons for its processing in accordance with the legal requirements.
8. **The right to file a complaint** with the Personal Data Protection Commission regarding the Company's processing of personal data in accordance with statutory procedures.

Nevertheless, the Company reserves the right to deny your request to exercise your rights as a data subject in conformity with the applicable laws and regulations.

To the extent permitted by law, however, the Company may charge you for the processing of your personal data, as requested by you, in respect of the data subject's rights.

#### Amendment to the Privacy Notice

The Company reserves the right to amend, add, change, improve or modify this notice to the greatest extent permissible by law. If there is a substantial change to this notice, the Company will notify you of any amendments, changes, improvements, or modifications and/or will seek your consent (if required by law).

#### Contact Us

If you have any concerns regarding the content of the Privacy Notice, or if you would like more information about the Company's practices related to the protection of your personal data, or if you wish to exercise your rights as a data subject, please contact our Data Protection Officer.

#### The Viriyah Insurance Public Company Limited

Data Protection Officer (DPO)

Compliance Department

Address: 121/28, 121/65 RS Tower, Ratchadaphisek Road, Din Daeng Subdistrict, Din Daeng District, Bangkok 10400

Contact Channel: Phone: 0-2129-8872, 0-2129-8873  
Office Hour: Monday - Friday 8.30 - 17.00.

E-mail: Compliance-DPO@viriyah.co.th