



Personal Data Protection Policy  
(For Customers and Prospects)  
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. As stipulated in the Personal Data Protection Act, B.E. 2562 (2019), the Company has developed a Personal Data Protection Policy 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.

### Objectives

1. To provide information regarding the processing of personal data as well as the collection, use or disclosure of personal data pursuant to the Personal Data Protection Act B.E. 2562 (2019).
2. To prevent the misuse of the personal data of the data subject or the person contacting the Company, in both paper and electronic data formats, or in the event of a privacy breach that causes harm to the data subject. The Viriyah Insurance Public Company Limited restricts access to personal data to only those who have been assigned and authorized. As required by law, we will collect, use, and disclose such personal data in paper and electronic data formats to protect the personal data of the data subject or the person who contacts the Company.
3. To ensure the security of personal data, prevent data leakage as well as the unauthorized or dishonest use of such information. It thus conforms to the Company's policy on information technology security.

### Scope of this Policy

1. This policy applies to customers, prospects, or website users.
2. This policy applies to the personal data of individuals with active and prospective business relationships with the Company. Such data is processed by the Company, its employees, contract workers, non-life insurance agents, non-life insurance brokers, business partners, and service providers of the Company, as well as parties or third parties that process this personal data in lieu of or on behalf of the Company, for a variety of products and services provided by the Company.
3. This privacy policy has been approved by the Board of Directors of the Company.



## Key Definitions

“**personal data**” refers to any information relating to a natural person, which enables the identification of such person, whether directly or indirectly, but not including information of deceased persons in particular.

“**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, and other applicable laws and regulations, as well as any personal information pertaining to racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any data which may affect the data subject.

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

“**Processing**” refers to any operation performed on personal data, including collecting, recording, copying, organizing, structuring, storing, updating, changing, recovering, using, disclosing, forwarding, disseminating, transferring, merging, deleting, and destroying.

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

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

“**Data Processor**” refers to a person or legal entity that collects, uses, or discloses personal data in response to orders issued by or on behalf of a personal data controller.

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

“**Paper Format**” refers to any paper or other object that has been defined by letters, numbers, diagrams, or templates and then printed, photographed, or generated in another way as proof of that definition.

“**Electronic Data Format**” refers to a message that has been created, transmitted, received, stored, or processed by electronic means such as electronic information exchange, electronic mail, telegram, teletype, or fax.

## Types of personal data

The Company will process your personal data, including the Sensitive personal data, in the following manner:

### 1. General personal data:

1.1 **Your general personal information**, such as name, surname, national ID number, date of birth, age, occupation, gender, marital status, photograph, home phone number, current address, mobile number, registered address, postal address, other details concerning identity verification, such as your national ID number, passport number, alien registration number, expiration date, passport issuing country, e-mail, audio conversations in any format, and other contact details



- 1.2 **Employment-related information**, such as job title, place of employment, and employment history, which may include your employer's name and address
- 1.3 **Financial data**, including income, source of income, bank account number, tax information, details of bank account transactions, loan, investment, credit card, and other payment details
- 1.4 **Product and/or service-related information**, including details of products and/or services that you purchased from the Company or other insurance business operators, such as policy number, sum insured, changes/transactions related to insurance policy, form of payment used to pay for premiums, premiums payment history or loan history, beneficiary details, claims, including the exercise of various rights under the policy or other products or services of the Company or other insurance business operators
- 1.5 **Legal status**, including money laundering status, terrorist financing status, bankruptcy, as well as status under the United States act prohibiting individuals and legal entities with U.S. person status from avoiding taxation (Foreign Account Tax Compliance Act (FATCA))
- 1.6 **Technical data and personal activities/user preferences** collected when you use the Company's website(s), mobile applications, and third-party social media platforms, including unique identifiers (UID) used on the social media platforms, IP address, cookies, browser type and version, time zone setting, type of browser plug-ins, operating system and platform, User Profile, and device data, including mobile devices, wireless network, and general network information

## 2. Sensitive personal data:

The Company collects Sensitive personal data only as needed and will notify the data subject of relevant details, request, and obtain explicit consent from the data subject only if specifically defined by law as an exception.

- 2.1 **Your health and medical information**, including your medical records, consultation reports, medical examination reports, medical investigation reports, nursing records, prescription records, treatment records, details of received medical services, medical reports, autopsy reports, and details of medical expenses as well as health-related inquiries and any data or object presented in the form of documents, files, reports, books, diagrams, maps, drawings, photographs, films, video or audio recordings, electronic recordings or anything else that causes the recorded material to appear in regards to the health of an identifiable individual, as well as other information required by the competent authority on the protection and management of personal health information
- 2.2 **Information regarding your prosecution history**, including criminal records, litigation records (civil or other legal proceedings), police reports, and relevant court orders, as needed



The personal information mentioned above is the personal data that the Company is obligated to collect for the purposes of entering into an insurance contract, performing contracts or any legal duty, as stated in each case. If you fail to provide the personal information required for the Company's operations, the Company may be unable to implement the policy's objectives or provide you with a full range of services, or you may be unable to use the Company's services properly. This may have an impact on compliance with any laws that the Company or you are required to follow.

**Concerning your sensitive personal data** processed by the Company, this is the personal data that the Company needs to collect and process for underwriting, entering into an insurance contract, complying with insurance contracts and related services, considering indemnity, including providing pertinent reinsurance for the benefit of your insurance contract or for the execution of relevant laws. If you fail to give consent or refuse to provide the Company with certain sensitive personal information, the Company may be unable to enter or fulfill the contract or take any required legal action.

**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.

### 3. Personal information pertaining to minors, quasi-incompetent individuals, and incompetent individuals (persons whose legal ability to conduct transactions is restricted)

The Company will process personal data of individuals whose legal capacity is limited to transacting only as necessary and pursuant to the Personal Data Protection Act. If the Company needs to process the personal data of a person who lacks legal capacity to enter into a contract for any activity, the Company will obtain the consent of a parent or legal guardian, guardian or curator who has the authority to act on behalf of such a person (as the case may be). Except in the case of requesting personal consent to the processing of personal data of minors above 10 years of age whose juristic acts are suitable for their conditions in life and necessary for their reasonable needs, such minors can give their consent independently.



### Source of personal data

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

1. **Insurance policy** - when the data subject expresses a desire to purchase or use personal insurance, group insurance, and/or when you access or use the Company's website(s) or mobile application and/or online services or other services ("Products" or "Services") on portable devices or by phone.
2. **Submitting documents and insurance application forms** - for purchasing, utilizing, or providing information as you contemplate the purchase or use of the Company's products or services.
3. **Identity verification** - when the data subject wishes to make any transactions or submit any requests to the Company, including digital identity verification (NDID – National Digital ID).
4. **Communicating with the Company** - regardless of who initiates written or verbal contact with the other party.
5. **Submitting request** - for modifying or enhancing the products you purchase or the services you employ, including the submission of forms and documents pertaining to the request for services associated with the Company's products.
6. **Communicating with the Company's personnel** - Customer Service representative, salesperson, insurance agents, insurance brokers, insurance intermediaries, contractors, business partners, service providers, attorneys-in-fact, authorized representatives or other persons or other related entities of the Company (collectively referred to as "Personnel and Partners" of the Company) via our website(s), mobile application, social media platforms, telephone, email, direct meet-up, interview, short text message (SMS), fax, post, or other similar means.
7. **Referral program** - or when the Company collects personal data from its employees and business partners.
8. **Organizing marketing or promotional activities** - when the data subject submits personal data to the Company to take part in marketing activities, contests, sweepstakes, events, or competitions organized by or on behalf of the Company, and/or by Company personnel and partners.
9. **Collecting information from other sources** - when the Company receives your personal data from third parties, including, but not limited to obtaining verified information from public sources, personal or commercial resources, websites, Social Media resources, data providers, medical resources, public health service establishments, hospitals, physicians, other healthcare professionals, other insurance operators, associations or confederations associated with the products you purchase or the services you use, insurance application forms for the products you purchase or the services you use, risk assurance of the products you purchase, product complaints and/or the Company's products and services purchased or used by you ("Third-party Resources"), including when the Company receives personal data from third parties about you for legal compliance and other regulatory purposes as well as for other lawful purposes, for example, the Company may obtain your personal data from the Office of Insurance Commission (OIC) or Anti-Money Laundering Office (AMLO).



When you provide the Company with any personal data pertaining to third parties (such third parties include but are not limited to the insured, family members, policy payors or beneficiaries), you must abide by the laws governing the protection of personal data, either by obtaining consent or by communicating this policy to a third party on behalf of the Company. You represent and warrant the accuracy of such personal data as well as validating and warranting that you have provided them with complete notice of this policy's particulars.

### Objectives of personal data Processing

The Company collects, uses, discloses, transmits, or 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, operate, comply with the procedures, and manage the Company's products and/or services on your behalf.
- 1.2 Adhere to, oversee, and complete procedures pertaining to the Company's services or products and recommend suitable products and services to you; to implement the following: compliance with the insurance product application process; handling of the products you purchase; collection of premiums and outstanding payments; investigation, analysis, processing, expropriation, and payment of claims/benefits under your policy; renewal, improvement, and cancellation of your policy; as well as the exercise of any policy right, including subrogation and subrogation rights (if any).

#### 2. To perform the necessary actions for the Company's legitimate interests:

- 2.1 **Manage the Company's insurance** for designing new products or services for the Company or enhancing the Company's existing products or services, as well as performing reinsurance proceedings for the Company's products or services on your behalf.
- 2.2 **Communicate with you**, including communicating management-related information and other information about any products or accounts you have with the company, providing technical support for the company's website(s) and mobile applications, and communicating any future changes to the policy.
- 2.3 **Prevent fraud and defalcation**, including investigating or preventing fraudulent activities, fraud, misrepresentation of facts, and other wrongdoing, whether actual or suspected wrongdoing, particularly when contacting companies in the financial services and insurance industries, as well as communicating with regulators associated with the company.
- 2.4 **Restructure the Company**, such as the reorganization of the Company and its transactions, including the purchase of sale of any portion of the business (if any).





- 2.5 **Provide electronic communication channels** for accessing content on websites, mobile applications, social media platforms or other services. The Company may process user behavior of websites, mobile applications or social media platforms in order to analyze your use of such websites, mobile applications, or social media platforms, and understand your preferred usage behavior in order to make those websites, mobile applications or social media platforms respond specifically to you; for evaluating or operating and improving those websites, mobile applications or social media platforms or products and/or services of the Company; for troubleshooting issues, recommending related products and/or services, and providing advertisements on websites, mobile applications and other channels based on the intended audience.
- 2.6 **Manage data**, including data management, storage, recording, backup, and deletion of personal data.
- 2.7 **Develop the Company's products and services**, including inspection and quality improvement, training on when the Company's communications are being recorded.
- 2.8 **Provide the data subject with information regarding after-sales support**, including coordinating follow-up services, resolving issues for the data subject as appropriate, such as insurance policy services or responding to inquiries, verifying the identity of the data subject, including taking into account and acting on any requests from the data subject.
- 2.9 **Put promotional activities into action**, including informing you about products and services that may be of interest to you. This may include insurance advice and information as well as promotional activities for products and services, such as reward and loyalty programs for loyal and privileged customers, charity and non-profit activities, and the organization of marketing activities, events, and other activities in which you choose to participate.
- 2.10 **Adhere to the Company's policy**, including compliance with and adherence to the requirements of the Company's internal policies.
3. **To analyze and prepare statistical data**, including conducting market research, advanced data analysis, statistical or actuarial science research, financial reporting or evaluations made by the Company, its Group of companies, personnel and partners or regulatory authority associated with the Company.
4. **To comply with the law** in the following manner:
- 4.1 **Comply with laws or the Company audits**, whether internal or external.
- 4.2 **Comply with all applicable laws**, rules, regulations, agreements, or policies established by the state regulatory authority, law enforcement agencies, government agencies, dispute resolution agencies, Office of the Insurance Commission or any other insurance business agencies.
- 4.3 **Enforce the law** or provide assistance, cooperation, or investigation by the Company or on its behalf, by the police, or by other governmental or regulatory bodies in the country; the implementation of reports and requirements as required by law or as agreed with other government agencies or regulatory bodies in the country or in any administrative district; or the execution of a lawful order of a government agency or officer.



**4.4 Support the supervision and promotion of insurance business** under the Insurance Commission and the law on Non-Life Insurance of the Office of Insurance Commission in accordance with the Personal Data Protection Policy of the Office of Insurance Commission, which can be reviewed at <https://www.oic.or.th>.

**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. If the Company wishes to use your personal data for a purpose not specified in this Personal Data Protection Policy or for purposes directly related to this Personal Data Protection Policy, 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 data.

- 1. Individuals who are partners, business partners, or third parties** involved in the insurance products offered to you or the products in which you may be interested, such as reinsurance companies, investment management firms, banks, financial institutions, credit rating agencies
- 2. Policyholders** in relation to group insurance products
- 3. Individuals who invite, persuade, suggest,** organize, offer for sale, sell, distribute, or provide services relating to products and/or services offered by the Company or companies in the Group to you, such as insurance agents, insurance brokers, and their legal entities or juristic persons
- 4. Any personnel and business partners** of the Company who provide services related to the management or processing of personal data, such as business process service, payment and debt collection service, or telecommunication service, technology service, cloud service, outsourcing service, call center service, storage service, document processing service, record keeping service, document scanning service, postal service, publishing service, parcel delivery service or parcel pick-up service by courier, data analysis service, marketing service, research service, emergency management service, legal service or other services linked with the Company's business operations or management arrangement, operation, compliance with procedures, or any handling associated with the Company's products or services
- 5. Provider of pre-insurance service,** such as pre-risk insurance surveyors
- 6. Provider of indemnity service,** including accident surveyors, auto service centers, hospitals, and garages
- 7. Other insurance companies**
- 8. Associations or unions in the insurance sector**





9. **Law enforcement agencies**, including statutory committees, government agencies or regulatory bodies, dispute resolution agencies or any other person in a country to which the Company or a Group company is obligated to disclose the information:
  - 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**, who are licensed professionals such as attorneys, physicians, auditors, or other 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 your personal data as stated above. The Company will preserve your personal data 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 personal 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 personal data that are out of the ordinary.

### 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 Personal Data Protection Policy

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



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THE VIRIYAH INSURANCE

### Contact Us

If you have any concerns regarding the content of the Personal Data Protection Policy, 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