

Privacy notice for customers

The Privacy Notice (“notice”) is developed for you, who are our customers, prospects, insured and beneficiaries to explain the processing of your personal data and seeks to inform you of the purpose of the collection, use, and disclosure (“processing”) of personal data that The Pacific Cross Health Insurance PCL (“the Company”) processing as data controller of your personal data for personal data activities under this notice.

Accordingly, the company will collect, use, or disclosure of your personal data as follows:

1. Legal basis for processing personal data

1.1. The Company collects personal data under legal basis as follows:

1.1.1 The necessity for consideration before entering into insurance contracts. It is unable for the Company to provide any services without receiving personal data.

1.2. The Company can collect personal data without consent of the data subject under the condition according to section 26 of Personal Data Protection Act, B.E. 2562

1.2.1. It is necessary for the Company to collect your work experience data, criminal record, financial data and health data for consideration of the qualification for underwriting as well as payments of the claims

2. Type of personal data and method of the collection

The company collects your personal data as follows:

2.1 The type of personal data that the Company collects varies, depending on the scope of products and/or services relating to the insurance of the Company, and the consists of personal data and sensitive personal data.

The personal data that the company processes may consists of the following:

2.1.1 General personal data

- (1) Data of personal nature that is related to you; for example, name, surname, titles, identification numbers, date of birth, occupation, gender, marital status, photographs, telephone numbers, registered address, mailing address, passport number, email address, and other contact information.
- (2) Data that is related to your work, for example position, office workplace, work experience and this may include the name and address of your employers.
- (3) Financial data, for example income, sources of income, bank account numbers, credit card numbers, credit card issues date, credit card expiration date, etc.

- (4) Details of the insurance products and/or insurance related products for example product information, insurance application and/or services or products of the Company or any insurers that you purchased or in which you are interested in, for example; insurance types and coverage, policy information and number, sums insured, any change or transaction in consequence of or relating to policies, methods or payments of insurance premiums , record of payments for insurance premiums or records of loans, beneficiaries, claims as well as any exercises of rights under policies or other products or services of the Company or any other insurers
- (5) Data that related to your status, i.e., the status concerning anti-money laundering and counter-terrorism financing, the status regarding bankruptcy, the status in relation to the US Foreign Account Tax Compliance Act (FACTA)
- (6) Data related to the use of electronics platform or the use of Internet, for example; technical data and personal activities, and this may include the use of online social network platforms, IP addresses, types of versions of browsers, time zone setting, types of plug-in browsers, operating systems and platforms, users profiles, information of equipment, including information on mobile equipment, wireless network information and general network information, data collected from cookies

Any audio or video recording, the recording by electronics means of correspondence records and communications between you and the Company, this may include various accessible formats or methods, for example, telephone, emails, conversations, and communications via social media

The personal data that stated above is the one that the Company requires to collect and process for consideration and underwriting, entering to contracts of insurance, performance of the insurance contracts and related services, consideration for the claim's payment as well as arrangements for related reinsurance so as to provide coverage for your contract of insurance or to comply with the law. If you do not give your consent or do not give personal data, the Company will be unable to enter into or fulfill such contract or take any required legal action.

2.1.2 Sensitive Personal Data

The Company collects sensitive data to the extent necessary for processing and shall notify the data subjects of details only after it has

requested and obtained express consent from the data subject, unless otherwise exclusively provided by law:

- (1) Criminal record data: For example, criminal records data related to the investigations of criminal offenses, police reports, criminal prosecution, or court order
- (2) Health data: For example, medical records, consultation reports, medical records, medical investigation records, nursing records, prescription records, treatment records, details of medical service received, medical reports, autopsy reports, medical expenses, any questions relating to health and any data or anything that was recorded about health that can be identified to a person, as well as other data that was notified by the competent authority for the protection and management of personal health data
- (3) Religious data: In case you wish to purchase specific insurance to comply with the religious principles of the insured or underwriting principles

Your sensitive personal data that the Company process is the data that the Company is required to collect and process for the consideration and underwriting, entering into contracts of insurance, performance of insurance contracts and related services, consideration for payment of claims, as well as arrangements for reinsurance so as to provide coverage for your contracts of insurance or to comply with the law. If you do not give your consent or do not give your personal data, the Company will be unable to enter into or perform such contracts or to take any act required by law.

2.2 Methods of collecting personal data

2.2.1 The Company collects your personal data directly from your insurance application forms or any request that you submitted to the Company including when you communicate with the Company through different communication channels or when you visit our website, access our applications, or other online media or participating in marketing activities.

2.2.2 The Company receive your personal data from third parties, from public sources, private sources, commercial sources, online social media sources, data providers, medical data sources, public health establishment, financial consultant, other insurance business operators, physicians, hospitals, professional associations such as the life/casualty insurance or other authorities, employer, employer's

financial consultant, social media service provider which content is related to the Company etc.

3. Purpose of the Processing of Personal Data

3.1 The Company process your personal data under

3.1.1 Contract basis: for the consideration of qualification before entering into contracts or for entering contracts or for complying with the contracts

3.1.2 Legal obligation basis: for compliance with the law of the Company's task

3.1.3 Legitimate interest basis: for the Company and third parties' interest

3.1.4 Prevent or suppress a danger to life, body or health of the person basis

3.1.5 Public interest basis: for performance of a task carried out in public interest by the Company or for the exercising of official authority

3.1.6 Consent basis: for cases that cannot be comply with any other legal basis

In addition, the Company can process personal data under the control of the

- a. It is to prevent or suppress a danger to life, body or health of the person where the data subject is incapable of giving consent
- b. It is to carry out activities of a foundation or non-profit organization under the conditions specified by law.
- c. It is information that is disclosed to the public with the explicit consent of the data subject
- d. It is necessary for establishment of legal claims
- e. It is necessary for compliance with a law to achieve the purpose with respect to
 - Preventive medicine or occupational medicine
 - Public interest in public health
 - Employment and social protection
 - Research
 - Substantial public interest

The Company shall process personal data of customers and/or third parties under legal basis for various objectives as follows

Personal Data Processing Basis	Personal Data Processing Activities
1. It is necessary to comply with the request of the data subject before entering into a contract or to performing a contract	<ul style="list-style-type: none">- Offering, selling, providing, managing, taking any act, and complying with procedures, and administering our products and /or services to you- Complying with procedures, administrating, completing our products or provision of services and

Personal Data Processing Basis	Personal Data Processing Activities
	<p>introducing appropriate products and services to you, complying with procedures for insurance application forms for products, administering the products that you purchase, collecting insurance premiums and outstanding amounts from you, investigating, analyzing, processing the surrender of insurance policies and making payments of claims</p> <ul style="list-style-type: none"> - Administering the insurance of the Company, i.e. our insurance product design, and/or new services, or adding or enhancing our current products and/or services, and any act of reinsurance for our products and/or services to you - Providing services on electronic communication channels, for example; so that you may access contents on our website, applications, or online social media platforms, or any exclusive services whereby we may process your use of those platforms for the following purposes: analyzing your behavior of using social media and understand your preferences in order to arrange appropriate online social media platforms according to the target group's preference as well as evaluating, operating, improving and solving problems.
<p>2 . It is necessary for the legitimate interests of the Company or the related parties</p>	<ul style="list-style-type: none"> - Communicating with you, including disseminating information on administration and other information on any products or accounts you may have with us, providing technical support on our website and applications or advising any amendment to this Personal Data Notice in the future - Promoting sales and giving information on products and services that are suitable for you as the customer of the Company, this may include giving advice and information on various matters, including insurance related matters and sales promotion activities for our products and services such as customer loyalty programs that give rewards, benefits, or privileges,

Personal Data Processing Basis	Personal Data Processing Activities
	<p>charitable activities/non-profit activities, marketing activities, and any other activities that the Company feels they may be your benefit</p> <ul style="list-style-type: none"> - Analyzing for statistical purposes, e.g., market research, advanced data analysis, and statistical or actuary research, reporting or evaluating the financial results of the Company, its group of companies, staff members and suppliers or the relevant regulatory authorities - Anti-corruption, e.g., investigation or prevention of fraud, concealment of facts, and other wrongful acts, whether actual or threatening, especially in communicating with other companies in the financial service and insurance sectors and communicating with the relevant regulatory authorities. - Restructuring the Company to restructure the organization and to enter into transactions of the Company, as well as buying or selling any part of the business of the Company (if applicable). - Auditing the business of the Company, either internal audit or external audit - Operating and managing the business of the Company - Complying with the Company's internal policies on these business operations - Management of information, e.g. for the purpose of managing, storing, recording, backing up, or destroying personal data - The Company will record images of people entering the Company's premises via CCTV for security reasons and people must exchange the ID card before entering the Company's building - The Company collects your personal data via our website in order to improve the website performance to be more efficient and appropriate besides this will be one of the communication channels

Personal Data Processing Basis	Personal Data Processing Activities
<p>3. It is necessary to comply with the law</p>	<ul style="list-style-type: none"> - To comply with the provisions of the applicable laws, rules, regulations, agreements, or policies of the official regulatory authorities, law enforcement agencies, government agencies, dispute resolution agencies or the insurance regulatory authority - For collecting, using and/or disclosing to the Office of Insurance Commission for 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 which can be reviewed at http://www.oic.or.th - For the purpose of law enforcement or assistance or cooperation in any investigation, carried out by us or on our behalf, by the police or other government agencies or regulatory authorities in the country, and performing duties in reporting and complying with the provisions of the laws or as agreed with other government agencies or regulatory authorities in other countries or administrative areas or taking any act with the lawful order of the competent officer or government agencies - To take any act in accordance with the Personal Data Protection Act, including any investigation in complying with the rights of data subjects - To comply with any order of the court or any other judiciary organizations
<p>4. It is necessary to create and take any act in relation to the rights of claim of the Company</p>	<ul style="list-style-type: none"> - The Company may be required to process your personal data to create, comply, dispute, defend or take any act on its rights of claim.
<p>5. Consent (for personal data)</p>	<ul style="list-style-type: none"> - The Company may process your personal data for sales promotions, as well as giving appropriate product and service information, this may include giving advice and information on various matters, including insurance-related matters, and sales promotion activities for our products and services,

Personal Data Processing Basis	Personal Data Processing Activities
	<p>for example, customer loyalty programs that give rewards, benefits, or privileges, charitable activities/non-profit activities, and marketing activities, event and other activities in which you choose to participate</p> <p>In this case, the Company will only be able to do so after you have given your consent, and you have the right to always withdraw your consent on the processing of your personal data for sales promotion activities by contacting us at the contact channels provided in this Notice, or click on the "unsubscribe" or "opt-out button on various communications, for example SMSs or emails that you receive</p> <ul style="list-style-type: none"> - The Company collects your personal data via websites or applications and other online social media networks. For advertising purpose, the Company may use cookies and information from the use of cookies to analyze your interest or requirement for insurance products and offer you the appropriate products, services, and promotion
6. consent (for sensitive personal data)	<ul style="list-style-type: none"> - Processing personal data on health for offering, selling, providing, managing, taking any act, complying with procedures, and administering our products and or services to you, e.g., underwriting, reinsurance, payments of claims, and any other act according to the types of insurance policies you have purchased - Processing criminal record data for preventing fraud, e.g. investigation or prevention of any fraudulent concealment of facts, and other wrongful acts, including disclosure of sensitive personal data to government agencies, law courts, other judiciary organizations, and business associations. In this regard, the Company shall

Personal Data Processing Basis	Personal Data Processing Activities
	disclose such personal data only to the extent necessary -

In addition, the Company may process your personal data to take any other necessary acts in relation to the purposes stated above

Unless otherwise permissible by the applicable laws and regulations, as well as the Personal Data Protection Act, if we wish to use your personal data for any purpose other than as specified in this Personal Data Privacy Policy or other than the purpose that are directly related to this Personal Data Privacy Policy, we will inform you and ask for your consent

4. Disclosure of personal data

The Company discloses your personal data to the following individuals or

- 4.1** Med-Sure Services Co., Ltd. for the consideration of insurance underwriting and the revision of the claim payment for the company's insurance policies.
- 4.2** Pacific Cross International Limited for reporting information to the company's major shareholders regarding human resource management activities.
- 4.3** Government organization for reporting data as required by the law or upon request by the government

5 Your rights relating to your personal data under Personal Data Protection Act, B.E. 2562

The objective of Personal Data Protection Act, B.E. 2562 is to make personal data under the protection of the owner and as the data subject of personal data, you have the following rights:

- 5.1** Right to access or to obtain a copy of your personal data that is under the responsibility of the Company and to request the disclosure of the source of your personal data in the case that the personal data has been collected from other sources unless the Company has the authority to deny from legislation or court orders or your request may cause damage to rights and freedoms of others

5.2 Right to request the Company rectify your personal data, which is incorrect or incomplete in order to make it more accurate, complete and present and not cause any misunderstanding

5.3 Right to suspension the use of personal data under the following circumstances:

5.3.1 While the Company is investigating your request for rectification

5.3.2 Your personal data is unlawfully collected, utilized and disclosed

5.3.3 When your personal data is not necessary for storing to meet the objective of the Company that informed you, but you request the Company to retain your data for supporting the exercise of your legal rights

5.3.4 During the period when the Company is able to demonstrate that there are, or significant legitimate grounds for collecting your personal data or when verifying the necessity of collecting, using, or disclosing your personal data for public interest, as a result of your exercising the right to object to the collection, use, or disclosure of your personal data.

5.4 Right to objection of the collection, use, or disclosure of your personal data, except in cases where the company has legitimate reasons to deny your request (e.g., the Company is able to demonstrate that there are more significant legitimate grounds for collection, use, or disclosure of your personal data or that they intend to establish, exercise or defense legal or for the Company's public interest mission)

6 Retention period of personal data

The Company will preserve your personal data for a maximum ten years following the termination of your relationship with the Company or your last contact with the Company under Personal Data Protection Act

Upon the expiration of the aforementioned period,, the Company will review and proceed to delete or destroy personal data or anonymize it within a period not exceeding 1 year, to remove all personal data once the retention period has elapsed, or for personal data that is irrelevant or exceeds the necessity of the collection purposes, or when the company must comply with your request to delete your personal data

7 The security of personal data

The company has appropriate measures to protect your personal data in both technical and managerial aspects, to prevent loss or unauthorized access, destruction, use, alteration, modification, or disclosure of personal information.

In addition, the company has established a personal data protection policy, which has been communicated throughout the organization, along with guidelines to ensure the security of collecting, using, and disclosing personal data, maintaining confidentiality, integrity, and availability of personal data. The company will review this policy and this notice at appropriate intervals.

8 The Involvement of personal data owner

The Company may disclose personal data upon the request from the owner of personal data, successor, heirs, or legal representative or guardian or legal guardian by sending the request through thdpo@th.pacificcrosshealth.com

In case that the owner of personal data, successor, heirs, or legal representative or guardian or legal guardian object the collection, accuracy or any action of the Company such as the notification of updating or modifying your personal data, the Company may record such objection as evidence

However, the company may deny the rights stated in the second paragraph in the case where it is mandated by law, or if your personal data has been anonymized or stripped of identifying characteristics that can identify you

9 The responsibility of Data Processor

Only officials with the authority and responsibilities associated with the gathering, use, and disclosure of personal information have been designated by the Company to have access to your personal information. The Company will ensure those authorities adhere to this privacy notice in the letter.

10 Modification

In updating or modifying this notice, the company may make changes as deemed appropriate and will inform you through the company's announcement channels, email, website, or other means, with the date of the latest version indicated at the end. However, the company recommends that you regularly check for any new notices, especially before you disclose any personal information to the company.

By using the product or service under this processing activity, you acknowledge the terms in this notice. If you do not agree with the terms, please discontinue using. If you continue to use the product or service after this notice has been amended and posted through the aforementioned channels, it will be considered that you have acknowledged the changes.

11 Contact information

If you have any questions regarding to this privacy notice, you can contact

Data Protection Officer :DPO

- Address: 3 Rajanakarn Building, 16th Floor, Zone BC, South Sathorn Road, Yannawa Sub-district, Sathorn District, Bangkok 10120Tel: 02-401-9181
- Email: thdpo@th.pacificcrosshealth.com