

Privacy notice for business partners and contractual parties

The Privacy Notice (“notice”) is developed for you, who are business partners, service providers, and prospective business partners, which may include individuals, representatives of entities such as directors, authorized signatories, authorized representatives, sub-authorized representatives, operators, agents, employees, and personnel of entities that have participated or will participate in transactions with the company 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. Definitions

“Prospective business partners”	Refers to individuals who may become business partners with the company, whether they have expressed an intention to enter into a contract and/or register as a business partner of the company, those interested in participating in business, those collaborating with the company, or any individuals requesting quotations or those to whom the company provides quotations
“Business partners”	Refers to individuals who submit bids to sell products and/or provide services to the company, business partners, business participants, service providers, service recipients, employers, contractors, consultants, experts, academics, lecturers, and company contractors
“Relevant person”	Refers to individuals associated with or representing prospective or actual business partners, such as directors, employees, representatives, authorized persons, grantors of authority, witnesses, and operators acting on behalf of entities.

	This also includes individuals whose personal data appears in documents related to processes involved in contracting
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2. Legal basis for processing personal data

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

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

2.2 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

2.2.1 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

3. Type of personal data and method of the collection

3.1 The company collects your personal data as follows

- (1) Data that can be used to identify an individual, for example names, surnames, dates of birth, religions, identification card numbers and other information on identification cards, signatures, or photographs
- (2) Contact information, for example email addresses, telephone numbers, Line identification, contact addresses, and mailing addresses
- (3) Financial data for example bank account numbers and bank account names
- (4) Your information in corporate documents of juristic persons of which you are a member or for which you act on behalf, for example affidavits, list of shareholders, partnership or company registration documents, memorandum of associations, value added tax registration certificates, photocopies of bank accounts, or other corporate documents containing your personal data
- (5) Data that is related to the status of contractual parties for example the financial status, the status regarding bankruptcy, money laundering and financing of terrorism
- (6) General data that is collected when you contact the Company for example photographs, video and audio recordings via closed circuit televisions at the branch offices or offices buildings or any properties of the Company
- (7) Any other data used in entering into transactions or contracts with the Company, for example personal data that is necessary for the Company to collect for entering into contracts or transactions between you and the Company. The Company will inform you prior to or at the time of any collection of such personal data

- (8) Personal data that is necessary for the performance of contracts between the Company and you or the juristic person of which you are a member, for example the personal data that you provided to the Company or the personal data that the Company collect from its website, or any applications that the Company jointly uses with you or the juristic persons of which you are a member. These may be our contractual parties for the performance of contracts for examples the websites that the Company jointly used with the parties engaged in the printing of policies, endorsements and payment of claim
- (9) Other data, namely, any other personal data that is not specified in the notice. If the Company plans to collect any personal data that is not specified in the notice, the Company will inform such collection as prescribed by the Personal Data Protection Act

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.

3.2 Methods of collecting personal data

3.2.1 The Company collects your personal data directly when you contact the company to enter into a contract and when there is communication via email, postal mail, or delivering documents in person.

3.2.2 In cases where the company receives your personal data from third parties, company clients, and/or other individuals who control or process data, whom the company believes in good faith to have the right to process and disclose personal data to the company. This includes but is not limited to receiving data through the following channels:

- (1) The company may receive your personal data from external parties, such as collecting personal data through intermediaries, or in some cases, the company may collect your personal data from public sources, business-related sources, or commercial sources, etc.
- (2) Authorities and legally authorized agencies, such as the Department of Business Development, Ministry of Commerce, Securities and Exchange Commission, Stock Exchange of Thailand.
- (3) Other third parties, such as the company you are affiliated with, your representatives, employers, sponsors, and third parties who have a role in providing services to you, distributors, external agents, including any individuals acting on behalf of those persons

4. Purpose of the Processing of Personal Data

4.1 The Company process your personal data under

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

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

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

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

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

4.1.6 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	- The taking of any necessary act in entering into contracts with the Company at your request
2. It is necessary to perform contracts	- The exercise of the rights and the performance of duties under contracts between the Company and contractual parties

Personal Data Processing Basis	Personal Data Processing Activities
	<ul style="list-style-type: none"> - Making payment of consideration under contracts between the Company and contractual parties
<p>3. It is necessary for the legitimate interests of the Company or the related parties</p>	<ul style="list-style-type: none"> - Identity verification and authentication - Verifying the capabilities and qualifications of parties in entering into contracts or verifying the authorization granted to you - Preparing reports or auditing the operation of the Company, either by the internal audit or external audit - Analyzing data relating to the operation of the Company - For the purposes of communications by any means and by any channels - Conducting surveys for the statistical purposes or researching into the operation of the Company - Investigation complaints lodged against the operation of the Company in which you may be involved - General administration of the Company, recording data of contractual parties of the Company to avoid any conflict of interest or any possibility of a conflict of interest - Management of information, e.g., for the purpose of managing, storing, recording, backing up, or destroying personal data. - Complying with the guidelines or practices in the industry specified by the associations or organization in the insurance business sector - Collecting personal data, for example names, surnames, time in-out of premises, photographs, video and audio recordings vis closed circuit television as part of Company's security system at the Company's buildings, branch offices, or any other properties of the Company, or others when you enter into the Company's premises

Personal Data Processing Basis	Personal Data Processing Activities
	<ul style="list-style-type: none"> - 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)
4. It is necessary to comply with the law	<ul style="list-style-type: none"> - To comply with the laws applicable to the operation of the insurance business of the Company - To comply with the orders, notifications, regulations, and rules issued by government agencies or regulatory authorities, for example the Office of the Insurance Commission (OIC), the Anti-Money Laundering Office, and the Royal Thai Police - To comply with the Personal Data Protection Act, including the taking of any act in dealing with your requests to exercise the rights of data subjects and in handling any breach of personal data - To comply with any order of the court or any other judiciary organizations
5. It is necessary to create and take any act in relation to the rights of claim of the Company	<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.
6. Consent	<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

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
- 4.4** Individuals engaging or intending to engage in transactions with the company, where your personal data may be part of the transaction or part of the company's offer to buy or sell
- 4.5** External consultants or experts of the company, such as legal advisors and accounting advisors
- 4.6** External service providers (including subcontractors) of the Company, such as technology service providers and storage or document warehousing services.

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