

Privacy Policy for Job Applicants and Employees

MSIG Insurance (Thailand) Public Company Limited ("MSIG") always attaches importance to the privacy and security of the personal data of job applicants, employees and related persons of job applicants or employees (which is referred to as "the Data Subject" in this Privacy Policy). MSIG therefore, establishes this Privacy Policy for the Data Subject to acknowledge MSIG's Privacy Policy ("Privacy Policy") according to the Personal Data Protection Act B.E. 2562 ("PDPA"), and applicable laws and regulations. Under this Privacy Policy, the Data subject will be notified of the collection, use and disclosure of personal data by MSIG, source of personal data collected by MSIG, purpose of the processing of personal data, disclosure of personal data, transfer of personal data to foreign countries, retention periods, the use of personal data for the original purpose, the Information Technology system and personal data security, the rights of the Data Subject, privacy policy updates, and MSIG's Data Protection Officer (DPO) contact.

1. Definition

"Personal Data" means information that makes it possible to identify the owner of personal data, whether directly or indirectly.

"Sensitive Personal Data" means information defined under Section 26 of PDPA, including race, ethnicity, political opinions, beliefs in cults, religions, or philosophies, sexual behavior, criminal records, health or disability Information, labor union data, genetic information, biological information, or any other information that similarly affects the owner of personal data as required by law.

"Personal Data Protection Law" means: The Personal Data Protection Act B.E. 2562 including subordinate regulations enacted and as amended from time to time.

2. Collect, Use and Disclosure of Personal Data by MSIG

Job applicants

- Personally Identifiable Information such as name address or other contact details, sex, age, nationality, marital status, date of birth, details Passport/ID card number Information of family members, or those who are under the care of job applicants and photos, etc.
- Information about the applicant's qualifications, skills and work history such as school/university diploma, study history, academic or language tests, occupational or professional license (e.g., Non-life insurance agent/broker license), certificate and supporting documents, etc.
- Personal data of persons associated with job applicants such as referral person, contact person etc.
- Sensitive Personal Data such as health information, criminal record, etc. The Company is obliged to collect these sensitive personal data for consideration of entering into the contract and assess the readiness of job applicants in the event that the company consider accepting job applicants as Data subjects of MSIG.

Employees

when being considered and entered into a contract to be an employee of MSIG. MSIG will collect and processing personal information of employee provided during the application process and will collect other additional personal information of employee as follows.

- Basic working details such as employee ID, job title, job description, chain of command, working hours, rules and conditions of employment, etc.
- General Information such as personal record, military service history, job interview information and supporting documents, other information from the surveillance system, control the entry and exit of buildings and places, CCTV, Tape recording, and recording of phone calls, email, and recording of internet usage data related to Data subjects' work with MSIG as far as not contrary to the law, etc.
- Information about benefits and wages such as payroll details and other Data subject benefits, social security, information about retirement/pension, provident fund, tax information, and information of third parties, beneficiaries, etc.
- Performance history including assessment, feedback, information on work regulations or complaint, annual holiday history, history of sick leave or absence from work, or information related to working in the workplace and safety, including inspection and risk assessment.
- Sensitive Personal Data such as health history. This is to provide welfare to Data subjects such as health insurance, or reimbursement of medical expenses, etc.

In the event that MSIG is necessary to collect personal information of Data subjects for entering into contracts, work ability assessment, welfare management, performance of the contract, or the performance of duties under the law, if the Data subjects does not provide such necessarily personal information for the operation of MSIG. MSIG may not be able to perform the objectives stated in this Privacy Policy or provide welfare or full service to Data subjects or Data subjects may not be able to use benefits or the services of MSIG properly or may affect compliance with the applicable law and regulations.

When the Data Subject provides any personal data relating to third parties to MSIG (such third parties include but are not limited to family members, relatives, or referral person), the Data Subjects must comply with the laws governing the protection of personal data. Whether seeking consent or notifying third parties of this Privacy Policy on behalf of MSIG, the Data Subjects represent and guarantee the accuracy of the personal data, as well as ensuring and guaranteeing that the Data Subjects has fully informed such person about the details of this Privacy Policy.

3. Source of Personal Data Collected by MSIG

In general, MSIG collects personal data directly from the Data Subjects, but in some cases MSIG may obtain the personal data from other sources or another person such as person who recommends Data subjects to MSIG, recruitment agency, hospital, relevant government bodies, or another person depending on the case, in such case MSIG will ensure compliance with the PDPA.

4. Purpose of Processing of Personal Data

Job applicants

- to consider and carry out required processes for Data subject recruitment such as consideration of the job applicant's resume, job interview, supporting documents, work ability assessment, management of health checks, and other related process, etc.

Employees

- to proceed with the entering into a contract or the execution of the contract such as for consideration of the employment agreement, preparation of documents for entering into an employment contract, entering into an employment contract with MSIG, including the rights and duties under the employment contract between the Data subjects and MSIG.
- to manage work and welfare to the Data subjects and/or third parties (if any) such as work ability assessment, measurement/evaluation, analysis, and training to develop potential and the ability of Data subjects, Human Resources Management, Data subject information verification in accordance with the laws and regulations, support Data subjects in various fields, welfare arrangement, prepare of Data subject records, insurance, medical history and insurance plans, planning and executing the hiring of Data subjects and training, promotion, job relocation, and to comply with the laws and regulations, wages, compensations and benefits payment, performance appraisal, internal reporting, data analysis, internal communication, appointments to both internal and external parties, evaluating job applications for new job opportunities, and employment decisions including promotion assessment, equal opportunity check.
- for research, data analysis and conducting statistical research on employment measurement/evaluation or similar processes related to employment and human resource management. This includes taking surveys of government statistics or responding to any request form other of the government bodies.
- to act as necessary for the legitimate interests of the Company as follows;
 - for the implementation of the requirements under the internal policies
 - For data management, data storage, record, back up, or destroying personal data
 - for tracking the Data subject behaviors including inspection and investigate the complaints of improper conduct, disciplinary action and/or regulations whether it is the internal investigation process or to cooperate with competent government bodies.
 - to provide a security system for the Data subjects, another employees or another person that enters and exits the area of MSIG
 - For the purpose of organization restructuring and for transactions
 - for the purchase or sale of all or any part of MSIG's business
- for legal compliance and the Company's business audit whether it is an internal audit or an inspection from a third party to operate in accordance with the requirements of the law rules agreement or applicable policies which is established by state regulators Law enforcement bodies government agency Dispute Resolution Authority or an agency that takes care of the insurance business Regardless of any agency including for law enforcement purposes. or providing assistance cooperate Investigation by the company or on behalf of the company by the police or by government bodies or other regulatory bodies other domestic and the implementation of reporting duties and different requirements other as required by law or as agreed with government bodies or other regulatory bodies other in any country or territory other or the execution of the lawful order of the competent official or government bodies.

- to carry out necessary operations related to any purpose other above, except for the law and applicable regulations Including the personal data protection law will allow to do otherwise. In this regard, if the Company wishes to use the personal data of the Data subjects for any purpose other than those stated in this privacy policy or in addition to the purposes directly related to this Privacy Policy, the Company will notify and seek consent from the Data subjects.

5. Disclosure of Personal Information

Under the rules of Personal Data Protection Law, MSIG may disclose the personal data of the Data subjects to the following parties:

- Group companies or affiliate companies both domestic and foreign.
- Professional consultants such as lawyers, doctors, auditors or advisor.
- Representatives and partners of MSIG who provide services related to the management or processing of personal data, such as non-life agent/broker, insurance companies, recruiter, service provider who provide support or maintenance to MSIG's information technology system or programs to support the job recruitment, wages and compensation payment and other Human Resources activities.
- Law enforcement bodies, committees established in accordance with the laws, government bodies or regulatory bodies, dispute resolution authorities, or any other person in Thailand, which MSIG or its group companies must (i) disclose information due to legal obligations and/ or compliance with laws and regulations in Thailand, and may include government bodies in the countries where the group companies are located, or (ii) due to the agreements or policies between MSIG, group companies and the state, regulatory authorities or other related parties.
- The person who enters into a transaction or will enter into a transaction with MSIG when the personal data of the Data subject may be part of the purchase or sale, or part of the offering or selling of MSIG business (if any).
- Any person or entity which the Data Subject consents to disclose the personal data to that person or entity e.g., provident fund, social security fund.
- Any person or entity authorized by applicable laws and regulations.

6. Transfer of personal data to foreign countries

MSIG may be required to send or transfer personal data of the Data Subject to affiliates or group companies; or to other recipients located abroad as part of MSIG's normal business practices, such as sending or transferring personal data to servers or clouds located abroad, the transmission or transfer of such personal data is subject to contractual requirements relating to the confidentiality and security of personal data in accordance with laws and regulations regarding the protection of personal data. In the event that MSIG sends or transfers personal data of the Data Subject to a foreign country, MSIG shall comply with the Binding Corporate Rules approved by the Personal Data Protection Committee ("PDPC") (if any) or personal data protection standards, which determine appropriate measures to protect personal data sent or transferred abroad (depending on the case).

7. Retention period

MSIG will retain the personal data for no more than 10 years from the end of the employment contract or end of the legal relationship (depending on the case) unless the law requires MSIG to retain personal data longer than the specified period of time. MSIG may continue to retain personal data of Data subject if necessary, in order to take any action under applicable laws, such as the Establishment of legal claims, compliance or the exercise of legal claims or raising the defense of legal claims. MSIG will delete or destroy personal data or make it anonymized when it is no longer needed or the end of the above mentioned period.

8. Use of personal data for the original purpose

MSIG is entitled to continue collecting and using the personal data of the Data Subject, which has previously been collected by MSIG before the effectiveness of the PDPA in relation to the collection, use and disclosure of personal data, in accordance with its original purposes. If the Data Subject does not wish MSIG to continue collecting and using his/her personal data, the Data Subject may notify MSIG to withdraw his/her consent by contacted MSIG's Data Protection Officer (DPO) at any time. (Please see more details on MSIG's Personal Data Protection Officer Contact in Article 12).

9. Information Technology System and Personal Data Security

MSIG has information security measures in place and strictly enforces the Information Security ("IS") policy to ensure the safeguard of personal data. The executives, employees, agents and third parties who receive information from MSIG must comply with MSIG's IS policy, which is regularly reviewed in order to ensure that the information technology system is effective in maintaining appropriate security, as well as setting measures to prevent personal information from being stolen or violated, such as determining the access rights to personal data on necessity basis, installation of computer anti-virus software and fraudulent emails (phishing mails), incorporated confidentiality clause in the agreements so that the contract parties will not use or disclose personal data out-of-scope or without authority, including establishing a personal data breach notification process and monitoring system for deleting or destroying personal data as required by law.

10. Rights of the Data Subject

The Data subjects can exercise their rights under the PDPA as follows:

- Revoke or request to change the scope of consent of the Data Subject provided to MSIG.
- Request to access, obtain a copy, or disclosure of the sources of personal data that the Data Subject does not give consent.
- Obtain personal data of the Data Subject or request to send or transfer their personal data to another data controller.
- Object to the processing of personal data in the following cases:
 - If personal data is collected without consent according to the public interest or the legitimate interests under Section 24 (4) or (5) of the PDPA, unless MSIG can prove that there are significant legitimate grounds or is intended to establish a legal claim, compliance or the exercise of legal claims or raising the defense of legal claims.

- Processing of personal data for direct marketing purposes.
- Processing of personal data for the purposes of scientific, historical, or statistical research, unless it is necessary for MSIG's public interest.
- Request to delete or destroy or anonymize the personal data collected by MSIG in accordance with the criteria required by the PDPA.
- Request to restrict the processing of personal data in accordance with the criteria required by the PDPA.
- Request to correct any personal data of the Data Subject to be accurate, current, complete and not misleading. If MSIG is unable to do so, the Data Subject has the right to request to record such request and the reasons in accordance with the criteria required by the PDPA.

MSIG reserves the right to consider the request to exercise the rights of the Data Subject as appropriate and in accordance with the criteria required by laws, however, the Data Subject may need to bear the reasonable costs for the requests.

In addition to the rights of the Data Subject as stated above, the Data Subject also has the right to lodge a complaint regarding breach or non-compliance of Personal Data Protection Law to the PDPC in accordance with the criteria required by the PDPA.

11. Privacy Policy Update

MSIG will review and update the Privacy Policy to ensure that the personal data is protected under the PDPA, laws and regulations relating to the protection of personal data. MSIG will announce the latest Privacy Policy on internal communication channels and website.

12. MSIG's Data Protection Officer (DPO) Contact

For any enquiry about this Privacy Policy, please contact MSIG's Data Protection Officer as follows:

- **Email** dpo@th.msig-asia.com
- **Postal mail** MSIG's Data Protection Officer (MSIG's DPO)
MSIG Insurance (Thailand) Public Company Limited, 15th Floor,
1908 MSIG Building, New Phetchaburi Road, Bang Kapi, Huai Khwang,
Bangkok 10310

If the Data Subject wishes to exercise the rights of the Data Subject under this Privacy Policy, please download, and fill in the form "Requesting the Exercise of Data subject's Right", posted on MSIG's website and submit it to MSIG's DPO.

This Privacy Policy was announced on 1st May 2022.