

## Privacy Policy for Job Applicants and Employees

MSIG Insurance (Thailand) Public Company Limited (“MSIG”) attaches importance to the privacy and security of job applicants’ personal data, employees and persons related to job applicants and employees (who are referred to as “the Data Subjects” in this Privacy Policy). MSIG therefore, establishes this Privacy Policy for Data Subjects to acknowledge MSIG’s Privacy Policy (“Privacy Policy”) according to the Personal Data Protection Act B.E. 2562 (“PDPA”), and other applicable laws and regulations. Under this Privacy Policy, Data Subjects will be notified of the collection, use and disclosure of personal data by MSIG, the source of personal data collected by MSIG, the purpose for the processing of personal data, disclosure of personal data, transfer of personal data to foreign countries, retention periods, the original purpose for the use of personal data,, 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 details.

### 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. Collection, 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 of Passport/ID card. Information on family members, or those who are under the care of job applicants, and their 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 licenses (e.g., Non-life insurance agent/broker license), certificates and related supporting documents, etc.
- Personal data of persons associated with job applicants such as referral persons, contact persons etc.
- Sensitive Personal Data such as health information, etc. MSIG is obliged to collect such sensitive personal data for consideration of entering into contracts and to assess the suitability of job applicants.
- Criminal record data, MSIG is required to collect this data to consider employment and evaluate the job applicants' suitability for employment with the express consent of the job applicant. MSIG shall notify the need to collect personal information regarding criminal records to the job

applicants in the process of announcing or publicizing job applications, recruiting, nominating, or accepting matters for such operations. If the job applicant does not give consent or withdraws consent, MSIG may not be able to proceed with the objective of considering to enter into an employment contract.

- MSIG shall keep personal data regarding the criminal record of the job applicants for no more than 6 months after the relevant processing has been completed, unless otherwise expressly consented by the job applicant at the end of such period. MSIG will delete, destroy or make such personal data non-identifiable to the person who owns the personal data by appropriate means.

### Employees

When being considered or having enter into a contract to be an employee of MSIG, MSIG may collect and process the personal information of employee obtained during or subsequent to the application process, including the following:

- 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 records, military service history, job interview information and supporting documents, other information from the surveillance system that control the entry and exit of buildings and other places, CCTV, tape recordings, and recording of phone calls, email, and recordings of internet usage data related to the Data Subjects' work with MSIG that is 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 related third parties, beneficiaries, etc.
- Performance history including assessments, feedback, information on work regulations or complaints, annual holiday history, history of sick leave or absence from work, information related to working in the workplace and safety, including inspections and risk assessment.
- Sensitive Personal Data such as health history only to provide welfare to Data Subjects such as health insurance, or reimbursements of medical expenses, etc.

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

When a 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 Subject 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 Subject shall represent and guarantee the accuracy of the personal data, as well as ensure and guarantee that the Data Subject has fully informed such person about the details of this Privacy Policy.

### 3. Sources of Personal Data Collected by MSIG

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

### 4. Purpose of Processing of Personal Data

#### Job applicants

- To consider and carry out the 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 processes, 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 of the Data subjects and/or third parties (if any) such as work ability assessments, measurement/evaluations, analysis, and training to develop the potential and the ability of Data Subjects, Human Resources Management, Data Subject information verification in accordance with laws and regulations, support Data Subjects in various fields, welfare arrangement, prepare 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 laws and regulations, wages, compensation and benefit payments, performance appraisals, 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, and equal opportunity checks.
- 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 for government statistics or responding to any requests from government bodies.
- To act as necessary for the legitimate interests of the Company as follows:
  - for the implementation of requirements under internal policies
  - for data management, data storage, records, back up, or destroying personal data
  - for tracking Data Subject behaviors including to inspect and investigate complaints of improper conduct, disciplinary action and/or regulations whether for an internal investigation process or to cooperate with competent government bodies.
  - to provide a security system for the Data Subjects, another employees or other persons that enter and exit MSIG premises
  - for the purpose of organizational restructuring and 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 for an internal audit or an inspection from a third party to operate in accordance with the requirements of the law, rules, agreements or applicable policies established by state regulators, law enforcement bodies,



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government agencies, Dispute Resolution Authority, agencies that oversee the insurance business, other agencies for law enforcement purposes providing assistance or cooperating with investigations by the company or on behalf of the company by the police, government body or other domestic regulatory bodies and for the implementation of reporting duties and other measures as required by law or as agreed with government bodies or other regulatory bodies in any country or territory or for the execution of the lawful orders of competent officials or government bodies.

- to carry out necessary operations related to any purpose, where applicable regulations including the Personal Data Protection Law will allow. 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 advisors.
- Representatives and partners of MSIG who provide services related to the management or processing of personal data, such as non-life agents/brokers, insurance companies, recruiters, service providers who provide support or maintenance to MSIG's information technology system or programs to support job recruitment, wages and compensation payment and other Human Resources activities.
- Law enforcement bodies, committees established in accordance with the law, government bodies or regulatory bodies, dispute resolution authorities, or any other person in Thailand to whom MSIG or its group companies must (i) disclose information due to legal obligations and/ or for compliance with laws and regulations in Thailand, which may include government bodies in the countries where 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.
- Persons who enter 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 to whom the Data Subject consents to disclose their personal data e.g. provident fund and 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

MSIG Insurance (Thailand) Public Company Limited  
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Huay Kwang, Bangkok 10310  
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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 Subjects 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 at 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 a Data Subject, previously collected by MSIG before the effectiveness of the PDPA, in consideration of the collection, use and disclosure of personal data, and 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 contacting 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 safeguarding 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 software to minimize viruses, malware and fraudulent emails (phishing mails), incorporating confidentiality clauses in the agreements so that the contract parties will be deterred from using or disclosing 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 for which the Data Subject does not give consent.
- Obtain personal data of the Data Subject or request the sending or transfer of their personal data to another data controller.
- Object to the processing of personal data in the following cases:



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- 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, intent to establish a legal claim, compliance reasons 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 and in the public interest.
- Request to delete, 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 is appropriate and in accordance with the criteria required by law, 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 breaches or the non-compliance of the 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 personal data is protected under the PDPA, laws and regulations relating to the protection of personal data. MSIG will announce its latest Privacy Policy on internal communication channels and its website.

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

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

- **Email** [dpo@th.msig-asia.com](mailto: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 updated and announced on 1<sup>st</sup> April 2024.