

Privacy Notice for Customer

Generali Life Assurance (Thailand) Public Company Limited and Generali Insurance (Thailand) Public Company Limited (“Generali”, “we” or “us”) would like customer (“you”) to understand this Privacy Notice. This Privacy Notice describes how we handle your Personal Data and Sensitive Data, including collection, storage, use, disclosure and your rights relating to your Personal Data and Sensitive Data according to Personal Data Protection Act B.E. 2562.

1. The Definitions

Personal Data is any other data which identify yourself (no matter it can be identified by itself, or together with other information) such as name, age, address, gender, occupation, date of birth, status, nationality, phone number, id card number, bank account, credit card number, photo, work address, e-mail, Line id, Google account, income, GPS, including data in any account of social media such as Facebook, Line, LinkedIn, Twitter, Youtube and Cookie etc.

Sensitive Data is Personal Data which is sensitive impacting the data subject such as racial or ethnic origin, religious or philosophical beliefs, data concerning a natural person’s sex life, criminal record, data concerning health, disabilities, biometric data as specified in the Personal Data Protection Act B.E. 2562.

Biometrics Data is Personal data derived from applying a technique or technology which detects a person’s unique physical or behavioral characteristics for purpose of identify such person that stands out from others. This may include face recognition data, iris recognition data or fingerprint recognition data.

Data Subject is a natural person whose Personal Data is processed by Generali.

Customer or You is a prospect, insurance applicant, insured, member of insured, beneficiary, a person who pay insurance premium, a person who is related to the insured, a person who joins Generali’s campaign/ marketing activities, a person who is interested in Generali’s products/services offered through any channels and/or a person who uses Generali’s services through online and electronic media, as the case may be, including a person who has an authorization to legally proceed an act on behalf of Customer, as the case may be, such as a legal guardian of minor, a curator of incompetent person and a legal guardian of quasi-incompetent.

Insurance is life insurance, unit linked insurance, group insurance and/or non-life insurance, health insurance, including any endorsement and addendum of aforementioned.

Data Processing is any activities as related to the personal data or sensitive data e.g. store, copy, manage, keep, update, change, use, recover, disclose, send, announce, transfer, collect, delete, destroy etc.

2. Personal or Sensitive Data Processing

2.1 We respect and focus on your right and the protection of your Personal Data, as the Data Subject. We are fully aware that you, as our customer, expect to receive security for your Personal Data when using our services.

2.2 We collect, use and disclose (“process”) your Personal Data and Sensitive Data as necessary and legality purposes referring to lawful basis.

In order for us to accommodate you when providing our service according to insurance contract, service contract and other activities which you are interested in, including any relevant laws, we have to obtain your Personal Data and/or Sensitive Data accurately, completely and appropriately. If we are not able to obtain your Personal Data/Sensitive Data correctly, it may cause you any inconvenience or delay of service. In case of the need to comply with contractual or legal obligation, we may need to refuse to serve you our services.

2.3 We also store a copy of your ID card, passport, or any other document issued by government agency which contain Sensitive Data such as race and religion. Such collection is for a purpose of identifying yourself or any person, being supporting documents for any transaction, legal act, contract, request form, or services.

We have **neither** intention **nor** policy to collect, use, or disclose your Sensitive Data (such as race and religion) appeared on such document other than abovementioned purpose. We therefore will cross out or conceal your Sensitive Data (such as race and religion) which is shown on your identification document, or supporting document for transaction, legal act, contract, request form, or services. We may proceed by ourselves without giving you a notice; or we may request you to cross out or conceal your Sensitive Data.

2.4 Personal Data of a minor, incompetent and quasi-incompetent person:

Minor as a Data Subject is a person aged below 20 years old and who is not sui juris. A consent of this type of person must be obtained from his legal guardian who has authorization to act on behalf of him.

Quasi-Incompetent as a Data Subject is a person who is adjudged quasi-incompetent due to physical or mental impairment, habitual prodigality or intoxication, or other similar causes that make him incapable of managing his own affairs, or whose managements is likely to



cause detriment to his own property or family. A consent for this type of person must be obtained from his curator who has authorization to act on behalf of him.

Incompetent as a Data Subject is a person who is adjudged incompetent due to mental illness. A consent for this type of person must be obtained from his legal guardian who has authorization to act on behalf of him.

In case of processing Personal Data on consent basis, and if, without our knowing, we found out later that we have collected your Personal Data without obtaining a consent determined by applicable laws, we will delete such Personal Data immediately if there is no legitimate ground other than consent basis to collect, use or disclose.

2.5 Below are details of our processing activities by both self-managing and outsource performing:

Processing Area	Activities	Lawful Basis for Processing
Advertisement and public relation management	Advertisement, marketing campaign, analysis of product development and customer contact to suggest or offer insurance product, including media and public relation management which customer is a presenter either wholly or partly express in the media of Generali.	Consent
	Analysis of website behavior, application, or online media in order to improve the usage.	Consent/Legitimate interest
Sale management and service provided by a person who is permitted to offer to sell insurance products or provide service to customer	Risk assessment and the appropriateness assessment of insurance product, including sale process, preparing and sending documents relating to insurance application, record of image and voice into Generali to underwrite, no matter in a form of paper or electronic.	Contract/Consent (only for Health data)
	Providing services, facilitating and cooperating between Generali and customer.	Contract
	Disclosure of Sensitive Data to agent, broker, policy holder, reinsurer, or insurance company for a purpose of insurance application, underwriting, reinsurance, insurance renewal, reinstatement and claim payment.	Consent
	Disclosure of Personal Data to agent, broker for a purpose of claim payment, being an insurance	Legitimate interest

Processing Area	Activities	Lawful Basis for Processing
	intermediary, including providing services to facilitate the insurance contract execution.	
Operation management and after-sale service	Collecting and verifying insurance application and supporting documents, underwriting, insurance renewal and reinstatement.	Contract
	Storing, collecting, using, disclosing Sensitive Data (such as health data, disability data, sex behavior etc.) of the family member of the insured such as spouse, father, mother or any other person necessary for insurance underwriting, reinsurance, insurance premium calculation and claim payment.	Consent (only for Sensitive Data) /Legal obligation of necessity to comply with laws for a purpose of public interest
	Verifying and analysis of Personal Data and Sensitive Data (such as health data, disability data, sex behavior etc.) of customer whose Personal Data was received or will be received by Generali from the disclosure of customer, physician, hospital or was disclosed between companies and other insurance companies, either in the past, present, or future for a purpose of verifying and considering insurance contract execution, reinsurance, insurance renewal and reinstatement, including insurance application and policy existing in present and future, regardless of whether Generali approves the insurance contract, reinsurance, insurance renewal and reinstatement.	Contract/ Consent (only for Sensitive Data)/Legal obligation of necessity to comply with laws for a purpose of public interest.
	Insurance risk assessment for insurance application and policy existing both in present and future.	Legitimate interest
	Disclosure of Personal Data of insured members who are family members, to principal insured members, as to facilitate in checking of policy conditions of group insurances; including furnishing or disclosing any data pertaining to claims submission on behalf of insured members who are family members.	Legitimate interest

Processing Area	Activities	Lawful Basis for Processing
	Verifying and assessing risk with respect to the anti-money laundering, counter-terrorist financing and proliferation of weapon of mass destruction and international sanction according to applicable laws under international FATF standard, including transferring data to Generali Group both inside and outside the country for a purpose of assessing risk and reporting transaction to supervisory department.	Legal obligation/ Legitimate interest
	Submitting and reporting reinsurance to the Revenue Department	Consent/ Legal obligation
	Verifying and reporting United States citizenship, including an indicia.	Legal obligation
	Verifying and reporting name of bankrupt person who enters into insurance contract according to order of officer/ government agency, independent organization, supervisory department, police, public prosecutor and court.	Legal obligation
	Issuing document, insurance policy, insurance certificate, insurance card, letter, receipt, and informing text, no matter in form of paper or electronic.	Contract
	Sending news, services relating to insurance policy, change of information and exercising right according to policy via SMS, email, letter or any other mean.	Contract
	Receiving premium payment for 1 st year and/or next succeeding year, deducting premium from bank account, debit card, credit card, refunding and paying claim, including informing an information via SMA, email, letter, or any other mean.	Contract
Claim payment management	Considering regarding claim and compensation payment for insurance policy.	Contract/ Legal obligation of necessity to comply with laws for a

Processing Area	Activities	Lawful Basis for Processing
		purpose of exercising the right.
	Transferring or receiving data for a purpose of considering claim payment on behalf of employer, policy holder, broker, or any relevant person provided that such document may contain Sensitive Data.	Consent/ Legal obligation of necessity to comply with laws for a purpose of exercising the right.
	Telemedicine service.	Contract
	Sending or receiving health history of policy holder from physician, hospital or medical facility, other insurance companies, or other Telemedicine service provider.	Consent
	Verifying and analysis Personal Data and Sensitive Data (such as health data, disability data, sex behavior etc.) of customer whose Personal Data was received or will be received by Generali from the disclosure of customer, physician, hospital or was disclosed between companies and other insurance companies, either in the past, present, or future for a purpose of verifying and considering claim payment (no matter paying in advance, cashless, or fax claim), including insurance application and policy, both in present or future, regardless of whether Generali approves the claim payment.	Contract/ Consent (only for health data) /Legal obligation of necessity to comply with laws for a purpose of public interest.
Customer care and claim management	Managing claim for customer and relevant person and sending information of insurance policy and other information relating to claim to supervisory department.	Contract/Legal obligation/Legitimate interest
	Recording image, voice and access history via CCTV.	Legitimate interest
	Scanning fingerprint, face, iris or other biological data to identify and verify customer's identity, to keep log of	Consent

Processing Area	Activities	Lawful Basis for Processing
	clocking in/out of office and building, to maintain security within office and building; including to disclose such biometrics data to building owner to provide their service and to maintain security.	
	Recording conversation to examine sale process, sale quality control, service quality development and claim request management.	Contract/Legitimate interest
Actuarial and product design management	Analysis data relating to Personal Data for a purpose of design, development, or improving insurance products and statistical working.	Legitimate interest
	Sending or receiving data for a purpose of reinsurance.	Contract
IT management	Preparing IT system for a purpose of recording, processing, connecting data with customer, agent, broker, reinsurer and service provider as Data Processor such as document storage service, Cloud service etc.	Contract/Legitimate interest
	Preparing and providing services regarding IT system for a purpose of processing Personal Data of customers from using website, application and social media such as Facebook, LinkedIn, Twitter, Youtube and Line etc., including biometric data such as face and fingerprint in order to use application.	Consent/Legitimate interest
	Recording data from Cookie for a purpose of statistical analysis or other activities of Generali in order to improve quality. “Cookie” is the data which Generali sends to program through web browser of customer. Once such data is installed in the system, if you use “Cookie”, our website will be able to memorize your browsing history unless customer leaves our website, delete such “Cookie”, or no longer enable “Cookie”.	Consent

Processing Area	Activities	Lawful Basis for Processing
	If you use “Cookie”, it will help facilitating you to use our website as “Cookie” will help memorizing you have visited.	
Claim and case management and risk assessment	Verifying and investigating fraud behavior, insurance fraud, or any action violating to laws and public interest.	Contract/Legal obligation/Legitimate interest
	Proceeding to check, investigate, examine, file lawsuit or take any action in order to exercise the contractual right and lawful right.	Contract/Legal obligation/Legitimate interest
	Transferring and disclosing Personal Data and Sensitive Data to the Office of Insurance Commission (OIC) for a purpose of sending reserve fund for both life and non-life insurance, preparing data base in Insurance Bureau system and fraud data base Watch List in order to supervise and comply with all applicable rules, notifications, regulations and orders issued by OIC. You can find more information about Privacy Notice of the Office of Insurance Commission (OIC) at website https://www.oic.or.th	Legal obligation
	Sending report regarding fraud of customer to supervisory department and other authorization such as police, the Office of Insurance Commission, Anti-Money Laundering Office, the Revenue Department, Legal Execution Department and Royal Thai Police etc.	Legal obligation/ Legitimate interest

- 2.6 We will strictly and properly implement the Personal Data and/or Sensitive Data security measure and be compliant with Privacy Notice in order to protect your Personal Data or Sensitive Data from any loss, destroying, modifying, accessing or disclosing without permission or legality in accordance with Data Security Policy and Procedure and IT Security Guideline and Policy. We will review this security measure periodically as appropriate.

- 2.7 If there is any change and/or adding of the purpose of processing e.g. processing based on contract or legal obligation basis etc., we will inform you of new purpose via <https://generalico.th/privacy-information> or any other mean we deem appropriate. We will record such changes for evidence. In addition, we may request your consent before processing any activities of new purposes (if such consent required by law).

3. We process your Personal Data restrictively

- 3.1 We will restrictively process your Personal Data or Sensitive Data by using lawful and fair method and within the scope of the specified objectives.
- 3.2 Other than the specified objective, we will obtain your consent prior to processing Personal Data; unless
- (1) It is required or obliged by laws;
 - (2) It is beneficial to you, given that it is impossible to obtain your consent at that time;
 - (3) It is necessary for executing or performing under the agreement;
 - (4) It is under legitimate interest of the company or any other person or any entity;
 - (5) It is beneficial to your or someone else's life, health or security;
 - (6) It is for a purpose of investigation of an officer or judicial process of court;
 - (7) It is beneficial to research or statistics preparation.
- 3.3 In case of necessity, we may collect your Sensitive Data for a purpose of considering for insurance underwriting, comply with the condition of insurance policy, claim payment and exercising legitimate right. We however will not collect your Sensitive Data which is adverse to your reputation or discriminating; unless
- (1) You give a consent to us;
 - (2) It is necessary to request, perform or use any right under the law or defend under the law;
 - (3) It is beneficial to your or someone else's life, health or security which Data Subject cannot give consent for whatever reason;
 - (4) It is public information;
 - (5) It is necessary for compliance with the law; and
 - (6) It is for a purpose of investigation of an officer or judicial process of court.
- 3.4 We may store your Personal Data that we have received from you directly together with your Personal Data that we have received from other sources for abovementioned purpose, for updating Personal Data, or improving our services.



4. Sources of Personal Data

We collect or obtain your Personal Data from the following sources:

- (1) Directly collecting from the Data Subject from service channels provided by Generali such as insurance application, insurance form, request form, registration, contract, marketing activities, survey, product or services which you make with Generali, or other channels controlled by Generali, or when you contact Generali through our office, or other contact method controlled by Generali such as email, social media, Facebook, Instagram etc;
- (2) Website browsing history of Data Subject or other products and services according to contract or other relationship such as cookies, or any software from Data Subject's device;
- (3) Other sources other than the source of Data Subject, or from public sources provided that such source is legitimate or obtains a consent from Data Subject to disclose to Generali, its affiliates, group companies, business partner, consultant, agent, broker, bank, other insurance companies, physician and medical staff, hospital, insurance policy holder, employer, governmental agency, professional association such as Thai Life Assurance Association (TLAA), Thai General Insurance Association (TGIA), social media service provider, online platform service provider etc., including the necessity to disclose Personal Data to related persons for a purpose of providing services according to service agreement.

Please note that this Notice includes the case where you disclose Personal Data of someone else to Generali such as Personal Data of a person who makes the insurance premium payment and/or beneficiary, a member of family, prospect etc. You are responsible for informing the detail of this Notice to as well as obtain the consent from such person (if it is the case).

In case the Data Subject refuses to give his Personal Data which is necessary for Generali to provide a service or an obligation under agreement or law, Generali may be unable to wholly or partly provide the service to such person.

5. We may disclose your Personal Data to Data Processor or any authorities as required by laws

- 5.1 In order to perform the obligation according to insurance contract, or abovementioned objective, we may transfer or disclose your Personal Data and/or Sensitive Data to third parties who are an authorized person to act on behalf of you, a policyholder (for group insurance), reinsurer, agent, broker, data processor, consultant and a person who provides

a service to Generali, or any person who is related to Personal Data processing in order to achieve abovementioned purpose, both inside and outside country.

- 5.2 We may store your Personal Data and/or Sensitive Data through Cloud Computing which is offered by outsourced service provider located both inside and outside country.
- 5.3 We may disclose your Personal Data and/or Sensitive Data to Generali Group, our affiliate, internal and external audit, The Office of Insurance Commission, Anti-Money Laundering Commission, Anti-Money Laundering and Counter-Terrorism Office located both inside or outside country, police officer, public prosecutor, court, legal execution enforcement officer, legal official receiver, Revenue Department officer, or any other office as required by relevant laws.

6. We may transfer your Personal Data to other countries

In some cases, Generali may send or transfer your Personal Data to other countries in order to comply with a purpose of providing services to you, Generali's obligation under contract made with other party, or obligation required by law such as collecting or processing Personal Data on Cloud system of which its platform or server located outside the country (i.e Singapore or United States) in order to comply with obligation under reinsurance contract, including risk management according to reinsurance etc., as the case may be.

In the meantime, the Personal Data Protection Committee has not announced the list of the countries which have adequate Personal Data protection standard. In this regard, when necessary, Generali has to send or transfer your Personal Data to the country provided that Generali will take an action to ensure that your personal data sent or transferred will be protected with the adequate international standard or proceed based on the condition that your personal data is legally sent or transferred under the following conditions:

- (1) The laws require us to send or transfer to other country;
- (2) We have informed to and obtained a consent from you for the case that the destination country has inadequate personal data protection standard, subject to the list of countries announced by the Personal Data Protection Committee;
- (3) It is necessary to comply with the contract which you are the contractual party to such contract; or it is a request from you prior to entering to such contract;
- (4) It is for a purpose of complying with the contract which Generali has entered into with other persons, for your own benefit;

(5) It is to prevent or suppress a danger to life, body or health of you or other persons, where you are incapable of giving consent by whatever reason;

(6) It is necessary for the performance of a task carried out for the public interest.

7. Your participation as Personal Data owner

7.1 If you would like to exercise your right as the Data Subject, you can contact **Customer Care Center tel. 1394**. When we receive your request, we will record your request, examine and respond back to you within appropriate time.

7.2 You have the right to check the existence, the type of your Personal Data and/or Sensitive Data, the using objective of your Personal Data and Sensitive Data. In addition, you also have the right to:

- (1) Request a copy or a certified copy of your Personal Data and/or Sensitive Data;
- (2) Request to make a change or correct your Personal Data and/or Sensitive Data;
- (3) Request to suspend the use or the disclosure of your Personal Data and/or Sensitive Data;
- (4) Request to erase or destroy your Personal Data and/or Sensitive Data;
- (5) Request to disclose the method of obtaining your Personal Data and/or Sensitive Data for the case which your consent has not been made;
- (6) Request to cancel your consent which you have previously made;
- (7) Request to transfer your Personal Data and/or Sensitive Data to other data controller;
- (8) Contact us or any relevant authorities, if necessary;
- (9) Complain to us or Data Processor or our/its employee or our/its service provider in case such person did not comply with Applicable Personal Data Protection Law.

In case we have any reason to reject your request, we will record such rejection and reason for rejection for evidence.

Remark:

If we process your Personal Data and/or Sensitive Data based on Contract, legitimate interest or legal obligation basis, we reserve our right to refuse your right in (3) and (4).

Please note that if you choose to exercise your right in (3) (4) and (6), we will not be able to perform the obligations under insurance contract in respect of claim payment, and not be able to provide services under contract to you.

We respect your decision in case you decide to withdraw your consent. However, we would like to inform you that your right to withdraw your consent may be restricted based on legitimate or your benefit of contractual ground. The withdrawal of consent does not impact the processing of your personal data which you previously gave the consent.

8. Period of Personal Data processing

- 8.1 If you are a prospect, we may process your Personal Data and Sensitive Data, and disclose such data to the Data Processor and related authorization required by law, as the case may be, as long as you withdraw your consent;
- 8.2 In case of insurance company, and you are related person to insurance contract or insurance policy, we may process your Personal Data and Sensitive Data, and disclose such data to the Data Processor and related authorization required by law, as the case may be, within the processing period specified below:

Lawful Basis for Processing	Processing Period
Contract	10 years from the termination date of insurance contract
Legitimate interest	10 years from the termination date of insurance contract
Legal obligation	10 years from the termination date of insurance contract
Legal obligation of necessity to comply with laws for a purpose of public interest	10 years from the termination date of insurance contract
Legal obligation of necessity to comply with laws for a purpose of exercising the right.	10 years from the termination date of insurance contract
Consent relating to insurance contract	10 years from the termination date of insurance contract
Consent not relating to insurance contract	10 years from the date the consent is given, or until the Data Subject become 71 years old, or until the consent is withdrawn, as the case may be.

If you have entered into other contract, together with insurance contract such as credit contract, loan contract, car hire purchase contract, or any other services contract,



processing period shall be subject to parties' contract agreed by parties provided that the longer processing period of any contract shall prevail.

- 8.3 If we refuse your insurance application on the ground that you are related person to insurance application, we shall have the right to process your Personal Data and Sensitive Data, or disclose such data to the Data Processor and related authorization required by laws within 10 years from the date specified in the insurance application, or within period necessary for processing.

9. Changes to this Privacy Notice

- 9.1 We may review this Privacy Notice regularly and reserve the right to make changes at any time to take account of changes in our operation, your recommendation and suggestion, including applicable laws, rules, orders, guidelines. We will either notify or send a notice to you regarding the change of this Privacy Notice in our website or other means we deem appropriate. You can access this Privacy Notice at website <https://generali.co.th/privacy-information>.

- 9.2 If you have any question, please contact us at:

(1) Regarding exercising your right for Personal Data; or questioning general information:

Customer Care Center Tel. 1394

Working hours: Monday-Friday from 08.30 -20:00 hrs. / Saturday from 08:30 – 17:00 hrs.

Email: info@generali.co.th

Line ID: @GeneraliThailand

Website: <https://www.generali.co.th>

Generali Life Assurance (Thailand) Public Company Limited

No. 1 Park Silom Tower, 21st floor and 20th floor unit 2002, Convent Road, Silom, Bangrak, Bangkok 10500

Generali Insurance (Thailand) Public Company Limited

No. 1 Park Silom Tower, 20th floor unit 2001, Convent Road, Silom, Bangrak, Bangkok 10500

(2) Regarding complaint for Personal Data:

Data Privacy Officer (DPO)

Email: dpo@generali.co.th

Working hours: Monday-Friday from 8:30 – 17:00 hrs.