

Personal Data Privacy Policy for Shareholders and Directors

Dhipaya Insurance Public Company Limited

Dhipaya Insurance Public Company Limited (the “**Company**”) is aware of the importance of privacy and its responsibilities relating to the collection, use, and disclosure of (“**processing**” or “**to process**”) your personal data. The Company, therefore, issues this Personal Data Privacy Policy (the “**Policy**”) to describe the details of the processing of your personal data, as well as details of the retention period of personal data, the disclosure of personal data as prescribed in the Personal Data Protection Act B.E. 2562 (2019) (the “**Personal Data Protection Act**”).

1. Scope of Application

This Policy applies to the shareholders, the advisors to the Chairman, and the directors of the Company. In the case of juristic person shareholders, this Policy applies to the employees, the directors or persons authorized to act for such juristic person shareholders.

2. Definitions

“**personal data**” means any information that can be used to identify a natural person, directly or indirectly, but shall not include, in particular, any information about deceased persons.

“**sensitive personal data**” means the personal data as specified in Section 26 of the Personal Data Protection Act, and other applicable laws and regulations, as well as personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities, trade union information, genetic data, biometric data, or any other data that may affect the data subject in the same manner, as prescribed and notified by the Personal Data Protection Committee.

“**Personal Data Protection Act**” means the Personal Data Protection Act B.E. 2562 (2019), including any notifications, rules, regulations, or secondary legislation issued by virtue of the Personal Data Protection Act, and any amendments thereto from time to time.

“**Committee**” means the Personal Data Protection Committee.

3. What type of personal data is collected?

The personal data that the Company collects consist of the following:

3.1 Personal data of shareholders:

- (1) Data that can be used to identify a natural person, for example: names, surnames, identification card numbers, citizenship, signatures;
- (2) Contact information, for example: email addresses, telephone numbers, addresses;
- (3) Data concerning the holding of shares or other securities (if any), namely, the number of shares held, shareholder registration numbers.

3.2 Personal data of directors or advisors to the Chairman:

- (1) Data that can be used to identify a natural person, for example: names, surnames, identification card numbers, photographs on identification cards, citizenship, signatures, data concerning vehicles, for example: vehicle registration numbers;
- (2) Contact information, for example: email addresses, telephone numbers, addresses;
- (3) Data concerning the holding of shares, namely, the number of shares held, shareholder registration numbers (if any).
- (4) Data concerning any record of criminal offenses, and in this case the Company is required by law to collect such personal data;
- (5) Data concerning your personal record, for example: data concerning family members, e.g. names, surnames, telephone numbers of family members, educational backgrounds, and training records, places of work;
- (6) Financial data, for example: data on credit cards, and bank account numbers.

In collecting photocopies of identification cards, the Company does not have any intention to collect any sensitive data that appears on your identification cards, for example: religion and/or blood type (if any). Therefore, before providing or disclosing photocopies of your identification cards to the Company, you are requested to redact any such sensitive data. If such sensitive data is not redacted, the Company will redact it itself. In this regard, the Company hereby confirms that it does not have any intention to act in bad faith or to commit any criminal offense and that the Company only collects personal data as necessary and as prescribed in the Personal Data Protection Act.

4. How is personal data collected?

4.1 In the case of shareholders:

In general, the Company will collect your personal data from Thailand Securities Depository Co., Ltd. and the Stock Exchange of Thailand, and directly from you when you attend meetings of shareholders.

4.2 In the case of directors or advisors to the Chairman:

In general, the Company will collect personal data directly from the directors or the advisors to the Chairman, whether verbally or in writing.

5. Purposes of the Processing of Personal Data

Your personal data will be processed for the following purposes:

5.1 Processing of personal data of shareholders

Personal Data Processing Basis	Personal Data Processing Activities
It is necessary for the legitimate interests of the Company or the related parties.	<ul style="list-style-type: none">- Taking any act concerning the rights to which you are entitled as a shareholder of the Company, or the authorized person of a shareholder of the Company, for example: the right to attend meetings of shareholders, to receive dividends, capital increases, capital decreases, or taking any relevant act.- Managing the Company's affairs as appropriate, for example: the management of the Company, preparing minutes of meetings, audio or video recording of meetings, and putting in place data safety and security measures.- Communicating news or offers in the interest of the Company's shareholders, for example: insurance-related rights and benefits or any interesting information concerning the Company or insurance. If you do not wish to receive any news or information on insurance-related rights and benefits of the Company or the shareholders, you may inform the Company and opt out of such message delivery at any time.- To support the Company's proposals in relating to the insurance business to government agencies, state enterprises or other agencies upon their requests.
It is necessary to comply with the law.	<ul style="list-style-type: none">- To comply with the laws applicable to the Company, for example: any management related to the shareholders of

Personal Data Processing Basis	Personal Data Processing Activities
	<p>the Company in accordance with the Public Limited Company Act B.E. 2535 and the Securities and Exchange Act B.E. 2535.</p> <ul style="list-style-type: none">- 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 Royal Thai Police, and the Office of the Securities and Exchange Commission.- To submit the Company's information to the Ministry of Commerce (the Department of Business Development) after shareholders meetings.- To comply with the Personal Data Protection Act, as well as to verify any act in exercising the rights of data subjects.- To comply with any order of the court or any other judiciary.
It is necessary to create and take any act in relation to the rights of claim of the Company.	The Company may be required to process your personal data to create, comply, dispute, defend or take any act on its rights of claim.

5.2 Processing of personal data of the directors and the advisors to the Chairman

Personal Data Processing Basis	Personal Data Processing Activities
It is necessary for the legitimate interests of the Company or the related parties.	<ul style="list-style-type: none">- To take any act in relation to your rights and duties as director, or advisor to the Chairman.- For the management of the Company's affairs as appropriate, for example, the management of the Company, the preparation of minutes of meetings, audio and video recording in meetings, putting in place information security and safety measures.- For disseminating information or suggestions in the interests of the directors or the advisors to the Chairman, for example, benefits relating to insurance, or useful

Personal Data Processing Basis	Personal Data Processing Activities
	<p>information relating to the Company or insurance. If you do not wish to receive information or news or benefits relating to insurance from the Company, you may inform the Company to cancel sending those messages at any time.</p> <ul style="list-style-type: none">- To support the Company's proposals in relating to the insurance business to government agencies, state enterprises or other agencies upon their requests.
It is necessary to comply with the law.	<ul style="list-style-type: none">- To comply with the laws applicable to the Company, for example: any management relating to the shareholders of the Company in accordance with the Public Limited Company Act B.E. 2535 and the Securities and Exchange Act B.E. 2535.- 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 Royal Thai Police, the Office of the Securities and Exchange Commission.- To submit the Company's information to the Ministry of Commerce (the Department of Business Development) after meetings of shareholders.- To publish the annual report and any other information the Company is required to disseminate to the shareholders or the public as required by law.- To comply with the Personal Data Protection Act, as well as to verify any act in exercising the rights of data subjects.- To comply with any order of the court or any other judiciary
It is necessary to create and take any act in relation to the rights of claim of the Company.	<p>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>
Consent	<ul style="list-style-type: none">- To process data concerning any offense or criminal records in order to review and prepare a report on the

Personal Data Processing Basis	Personal Data Processing Activities
	<p>qualifications of directors to the Office of the Securities and Exchange Commission as required by law.</p> <p>- To collect any sensitive data that appears on your identification cards.</p> <p>Remark: As stated above, the Company does not have any intention to collect your sensitive data, including the sensitive data that appears on your identification card. If it is necessary and unavoidable for the Company to collect your personal data, the Company will obtain your consent as required by law.</p>

6. Who will receive your personal data from the Company?

The Company may disclose, send, or transfer your personal data to the following persons:

- (1) Independent advisors or experts, for example: legal advisors, accounting consultants, auditors, or any other advisors.
- (2) Third party service providers of the Company (including their subcontractors), for example: providers of technological services, cloud services, outsourcing of manpower, goods storage or documents storage and document services, data recording services, mail services, parcel delivery services, data analysis services, research services or other services related to the business operation of the Company;
- (3) Government agencies and judiciary organizations, for example: the Office of the Securities and Exchange Commission, the Office of the Insurance Commission (OIC), the Royal Thai Police, the Ministry of Commerce, the Department of Legal Execution, law courts, and the Office of the Personal Data Protection Committee;
- (4) Any person who enters or will enter into transactions with the Company and your personal data may be a part of any purchase or sale or a part of any offer to purchase or offer to sell of the business of the Company (if applicable);
- (5) Government agencies, state enterprises, or any other organizations in which the Company participates in bidding in relation to the insurance business of the Company;

- (6) Any persons to whom you have given your express consent to disclose your personal data.

7. Cross-border personal data transfer

In general, the Company does not transfer any personal data abroad. However, if it is necessary for the Company to transfer your personal data abroad, the Company will take any appropriate act to protect your personal data in compliance with the law.

8. Retention of personal data

We shall retain your personal data to the extent it is necessary to achieve the purpose of its process, but it shall be no longer than a period of 10 years from the end of your relationship or the last contact with the Company. The Company may retain your personal data for a longer period as specified if it is permissible by law or if it is a duty of the Company.

The Company will take reasonable steps to erase or destroy or anonymize your personal data so that it is no longer identifiable for the retention period of personal data above.

9. Your rights relating to your personal data

You have rights in respect of your personal data under the Personal Data Protection Act as follows:

- (1) **Right to access:** You have the right to check whether or not the Company has any data relating to you, and the right to access or 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.
- (2) **Right to rectification:** You have the right to request the Company to rectify any personal data pertaining to you.
- (3) **Right to erase or destroy:** You have the right to request the Company to have your personal data erased, destroyed or anonymized so that it can no longer be identifiable. The procedures for erasure, destruction, or anonymizing personal data so that it can no longer be identifiable shall be specified by the Company and will be in compliance with the law.
- (4) **Right to object to processing:** You have the right to object to the Company's processing your personal data in the case that the Company's

processing of your personal data was without your consent, or in the case of direct marketing.

- (5) **Right to restrict processing:** You have the right to restrict the processing of personal data pending the Company's consideration of any act according to your right, or if you wish to restrict the processing of personal data instead of erasing or destroying it.
- (6) **Right to data portability:** You have the right to request the Company to transfer your personal data, in a format that is readable or commonly used by way of automatic equipment, to other controllers, and to receive such data (in the case that the Company has made the personal data available in such format).
- (7) **Right to file complaints:** You have the right to file complaints to the Office of the Personal Data Protection Committee with respect to the processing of personal data by the Company in following the procedures in accordance with the law.

The Company reserves the right to decline any request to exercise the right by data subjects as it deems appropriate and in accordance with the law.

In the case that it is permissible under the law, you may be subject to payment of reasonable expenses incurred in connection with the Company's taking any act on your request to exercise of a data subject, provided that the Company shall inform you prior to undertaking any act which incurs expenses.

10. Amendment to this Policy

The Company reserves the right to make any amendment, addition, change, improvement, or adjustment to the Policy, to the extent permissible under the law. In the case of any material change to this Policy, the Company shall inform you of any such amendment, addition, change, improvement, or adjustment and/or may obtain your consent (if such consent is required by law).

11. Contact Channels

If you have any question relating to any part of this Personal Data Privacy Policy or require additional information relating to the Company's guidelines in protecting your personal data, or if you would like to exercise the right as data subject, please contact us at:

Details of the Company

Name: Dhipaya Insurance Public Company Limited

Address: 1115, Rama 3 Road, Chong Nonsi, Yannawa, Bangkok 10120.

Telephone No.: 1736 (Monday-Friday: 8.30 - 16.30)

(Translation for informational purposes only)

Details of the Data Protection Officer (DPO)

Data Protection Officer of Dhipaya Insurance Public Company Limited

Address: 1115, Rama 3 Road, Chong Nonsi, Yannawa, Bangkok 10120.

Contact Channel: TIP-DPO@dhipaya.co.th