

**Personal Data Privacy Policy for Job Applicants**  
**Dhipaya Insurance Public Company Limited**

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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 prescribed in the Personal Data Protection Act B.E. 2562 (2019) (the “**Personal Data Protection Act**”) as follows.

**1. Scope of Application**

This Policy applies if you apply for a job with the Company in all cases, regardless of the position applied for or the channels of application. This Policy also applies to every person related to the applicant, for example: his or her family members, and persons referred to and stated on the application form.

**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 may collect consists of the following:

- (1) **Data that can be used to identify a natural person and general data of a person**, for example: names, surnames, dates of birth, ages, nationality, religions, identification card numbers and other data on identification cards, signatures, photographs, weights, heights, places of birth, and social security numbers;
- (2) **Contact information**, for example: email addresses, telephone numbers, registered addresses, contact addresses, Line ID, Facebook account;
- (3) **Data concerning qualifications and work experience**, for example: educational background, educational institutions, current occupation(s), trainings, relevant certificates, for example: professional certificates;
- (4) **Personal data of family members**, for example: names, surnames, addresses, telephone numbers, ages, status, occupations, positions, work addresses, dates of birth of fathers, mothers, spouse(s), children or other data that appears on job applications;
- (5) **Personal data of other persons that may be related to your job applications**, for example: personal data of your acquaintances who work for the Company, personal data of contact persons in the case of emergency, personal data of persons provided in job applications for reference checks, and personal data of your supervisors. The general data of those persons is, for example: names, surnames, telephone numbers, relationship with the job applicants, occupations, positions, work addresses;
- (6) **Data concerning your competencies**, for example: language literacy, computer literacy, talent, and other skills or knowledge that you provide in the job applications and supporting documents;
- (7) **Other data that appears on supporting documents of job application**, for example: data that you willingly provide in your job applications or resumes, military service records, or ordination records;
- (8) **Data concerning your use or access to the Company's system or websites**, for example: usernames, passwords (if any);
- (9) **General data that is collected when you visit the Company**: names, surnames, time in-out of premises, photographs, video and audio recordings via closed circuit televisions at the Company's buildings,

branch offices, or any other properties of the Company or others whenever you enter into the Company's premises;

- (10) **Sensitive personal data**, namely, health data, health records, criminal records, or disabilities. It is necessary for the Company to collect this sensitive personal data for its consideration for entering into contracts and the evaluation of readiness of job applicants. If you do not provide the Company with this sensitive personal data, the Company will not be able to consider your readiness to enter into an employment contract with the Company;
- (11) Other personal data that you willingly disclose to the Company or additional personal data upon the Company's request in each case. In collecting additional personal data, the Company will take any necessary act in compliance with the Personal Data Protection Act.

The personal data stated above in each case is necessary for our consideration for employment for the position for which you have applied. If you do not provide the Company with this personal data, the Company will not be able to consider your qualifications and appropriateness of the position applied for and enter into a contract with you. In the case that such data is necessary for complying with the law and you do not provide the Company your personal data, the Company will not be able to take any act in relation to those matters or comply with the provisions of law.

In collecting photocopies of identification cards, the Company does not have any intention to collect any sensitive data appeared 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 such sensitive data. 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 it is necessary as prescribed in the Personal Data Protection Act.

In the case that you provide the Company personal data of other persons, for example: personal data of family members, personal data of your acquaintances who work for the Company, personal data of contact persons in the case of emergency, personal data of persons provided in job applications for reference checks, personal data of your supervisors, you are required to inform the data subjects of the details of the disclosure and the processing of personal data under this Policy and obtain consent directly from the data subjects and you have the duty to take any necessary act and ensure that you will take any act in order that such disclosure of personal data by you and the processing of personal data by the Company are in compliance with the law.

#### **4. How is personal data collected?**

In general, the Company will collect your personal data directly from you upon your job application with the Company, whether via electronic channels such as email and the Company's website or via other channels, for example: when you submit a job application with an employee of the Company, at the Company's office or other places.

In some cases, the Company may collect your personal data from other persons, for example: recruitment agencies, references from other persons or organization that are related to you, for example: disability employment support foundations or educational institutions.

## 5. Purposes of the Processing of Personal Data

Your personal data will be processed for the following purposes:

Personal Data Processing Basis	Personal Data Processing Activities
<p><b>It is necessary to comply with the requests of data subjects before entering into contracts.</b></p>	<ul style="list-style-type: none"> <li>- Consideration of job application forms, supporting documents, and details of applicants in order to consider qualifications and evaluation of other factors of job applicants.</li> </ul>
<p><b>It is necessary for the legitimate interests of the Company or the related parties.</b></p>	<ul style="list-style-type: none"> <li>- Taking any act in relation to job applications, for example: job interview, reviewing the details of job applicants.</li> <li>- Verification and authentication of identity.</li> <li>- Preparing employment agreements, including arranging for equipment and other documents for recruiting purposes in accordance with the Company procedures (in the case that a job applicant is recruited to be an employee of the Company).</li> <li>- In the case of a job applicant who is not recruited, the Company may continue to retain his or her personal data in order for the Company to consider and offer an appropriate job in the future, with the exception of the case that the job applicant does not wish the Company to do so.</li> <li>- <u>Collecting personal data of other persons who are related to job applicants</u> in support of consideration of job applicants, for emergency contact, information or reference checks.</li> </ul>

Personal Data Processing Basis	Personal Data Processing Activities
	<ul style="list-style-type: none"> <li>- Preparing reports or auditing the operation of the Company, either by internal audit or external audit.</li> <li>- Analysis of data concerning the operation of the Company.</li> <li>- For the purposes of communications of any means and any channels.</li> <li>- Conducting surveys, collecting statistical data, or conducting researches on the operation of the Company.</li> <li>- Investigation of complaints concerning the Company's conduct relating to recruitment.</li> <li>- General administration of the Company, for example: preparing records of job applicants, and for avoiding any conflict of interest or any possibility of conflict of interest.</li> <li>- Management of information, e.g., for the purpose of managing, storing, recording, backing up, or destroying personal data.</li> <li>- Collecting personal data, for example: names, surnames, time in-out of premises, photographs, video and audio recordings via closed circuit televisions as part of the 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;</li> <li>- Complying with the guidelines or practices in the industry specified by the associations or organization in the insurance business sector (if applicable);</li> <li>- 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).</li> </ul>

Personal Data Processing Basis	Personal Data Processing Activities
	<ul style="list-style-type: none"> <li>- Complying with the laws of other jurisdictions (if applicable).</li> </ul>
<p><b>It is necessary to comply with the law.</b></p>	<ul style="list-style-type: none"> <li>- To comply with the laws relating to employment, labour protection, and foreign workers (in the case of non-Thai nationals).</li> <li>- To comply with the laws applicable to the operation of the insurance business of the Company.</li> <li>- To comply with the orders, notifications, regulations, and rules issued by government agencies or regulatory authorities, for example: the Ministry of Labour, the Office of the Insurance Commission (OIC), and the Royal Thai Police.</li> <li>- To comply with the Personal Data Protection Act, including taking any act upon a data subject exercising his or her right and the handling of any personal data breaches.</li> <li>- To comply with any order of the court or any other judiciary organizations.</li> </ul>
<p><b>It is necessary to create and take any act in relation to the rights of claim of the Company.</b></p>	<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>
<p><b>Consent</b></p>	<ul style="list-style-type: none"> <li>- To collect sensitive personal data that appears on identification cards.</li> </ul> <p><b>Remark:</b> As stated above, the Company has no intention to collect your sensitive personal data, nor any sensitive personal data that appears on identification cards. However, if it is necessary for the Company to collect your sensitive personal data, the Company will obtain your consent as required by law.</p> <ul style="list-style-type: none"> <li>- To collect sensitive personal data, namely, health data, health records, disabilities, or criminal records, in order for the Company to consider</li> </ul>

Personal Data Processing Basis	Personal Data Processing Activities
	your qualifications and appropriateness of the position applied for in accordance with the recruitment procedure.

In addition to the processing of personal data as stated above, in the case that you have been selected to work for the Company, you accept that your personal data will be processed in accordance with the Personal Data Privacy Policy for Employees.

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

The Company generally does not disclose your personal data to third parties, however, 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 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) Organization relating to insurance, for example: the Thai General Insurance Association;
- (4) Government agencies and judiciary organizations, for example: the Ministry of Labour, the Social Security Office, the Office of the Insurance Commission (OIC), the Royal Thai Police, the Department of Legal Execution, law courts, and the Office of the Personal Data Protection Committee;
- (5) 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);

- (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 personal data abroad, and the personal data protection standards of the destination country may be less stringent than those prescribed the Personal Data Protection Act, 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. In the case that you are recruited by the Company, the Company will retain your personal data through the term of employment and for a period of no longer than 10 years following the termination of employment 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.

In the case that an applicant is not employed by the Company, the Company will retain personal data of the applicant for a period of one year for the purpose of consideration and offering a suitable job position to that applicant in the future.

During the time that your personal data is retained by the Company, the Company will put in place personal data measures as required by law and 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 taking 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)

**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](mailto:TIP-DPO@dhipaya.co.th)