

Privacy Policy

Last Update 9 March 2021

Central Insurance Services Ltd. (the “**Company**,” “**we**,” “**us**,” or “**our**”) recognizes the importance of the protection of personal data for you of our products and services. We know you care how information about you is collected, used, disclosed, and transferred outside of Thailand. The information you share with us allows us to provide the products and services you need and want appropriately tailored for you, not only from us, but also those within Central Group's data ecosystem. We appreciate your trust that we will carefully and sensibly handle your personal data while giving you the very best personalized experience and customer services.

This privacy policy (this “**Privacy Policy**”) applies to our retail stores, websites, mobile applications, call center, social networking sites, online communication channels, and other locations where we collect your personal data. However, please read this Privacy Policy in conjunction with the terms and conditions of particular service that you use. (This may be provide separately according to the type of Personal Data that we collect from you)

For the purpose of this Privacy Policy, “**Personal Data**” means any information relating to an identified or identifiable natural person.

We reserve the right to modify this Privacy Policy from time to time, so please review it frequently to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on our website or application. We will provide additional notice of significant updates. In case any modification deprives your rights of sensitive data in relation to this Privacy Policy, the Company will first obtain your consent, except as otherwise permitted by law.

1. What Personal Data we collect

We may collect or obtain the following types of information which may include your Personal Data directly or indirectly from you or other sources or through our affiliates, subsidiaries, business partners or other companies. The specific type of Personal Data collected will depend on the context of your interactions with us, and the services or products you need or want from us and companies in Central Group's data ecosystem.

- 1.1. **Personal details**, such as title, full name, gender, age, occupation, qualifications, job title, position, business type, company name, nationality, country of residence, date of birth, marital status, number of family members and children, ages of children, information on government-issued cards (e.g., national identification number, photograph of the national identification, information on the national identification, control number on the reverse side of the national identification (Laser ID), social security number, passport number, tax identification number, driver's license details or similar identifiers), immigration details such as arrival and departure date, signature, voice, voice record, photograph, facial features for recognition, CCTV records, work place, education, insurance details, license plate details, house registration, household income, salary and personal income;

- 1.2. Contact details**, such as postal address, delivery details, billing address, residential address, workplace address, address shown in the national identification card, telephone number, fax number, email address, LINE ID, Facebook account, Facebook ID, Google ID, Twitter ID, and other ID from social networking sites, your contact person's contact details (e.g., telephone number, contact data on any correspondence (e.g. written communication with you), and any other contact details you provided to us;
- 1.3. Membership details**, such as account details, member card number, reward points, member ID (e.g. The 1 member card number, The 1 ID, Siebel ID, member ID, customer ID), member type, customer type, member join/registration date and month, membership period, bank account and payment details, service and product applications (e.g. membership application, insurance application);
- 1.4. Financial details**, such as debit/credit card or bank information, credit/debit card number, credit card type, issuance/expiration date, cycle cut, account details, bank account details, prompt pay number payment details and records, your information regarding the risk profile for the business partner, credit rating and solvency, information in accordance with the declaration of suitability, suitability of transaction and any other financial details;
- 1.5. Transaction details**, such as details about payment to and from you, payment date and/or time, payment amount, details about refund, refund amount, points, date and location of purchase, purchase/order number, appointment date for service, address/date and time for pick up or delivery, acknowledgement of receipt, recipient email's signature, warranty details, complaints and claims, booking details, rental details, transaction, transaction history, location, transaction status, past sales transaction, status, transaction status, purchasing behaviour, and any other details of products and services you have purchased, including but not limited to any information incurring from using of products or services provided on our platform, such as e-pocket, digital asset, lending product, insurance product and the product related to wealth management, etc.;
- 1.6. Technical details**, such as Internet Protocol (IP) address, cookies, media access control (MAC) address, web beacon, log, device ID (such as international mobile equipment identifier (IMEI), electronic serial number (ESN), mobile equipment identifier (MEID) and serial number (SN)), device model and type, formats of software and hardware of the device when it is activated in the system, network, connection details, access details, single sign-on (SSO), login log, access time and location, time spent on the page, login data, GPS, latitude, longitude and time spent on each webpage, login information, applications downloaded on a communication devices, search history, browsing details, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on devices you use to access the platform, including any other technical information arising from the use of our platform and systems;
- 1.7. Behaviour details**, such as information about your purchasing behavior and data supplied through the use of our products and services;
- 1.8. Profile details**, such as your username and password, profile details and picture, purchases, historical orders, past orders, purchase history, items bought, item quantity, orders or product recalls made by you, orders via website, Cash On Delivery details, order ID, financial records, PIN, your interests, preferences, feedback and survey responses, satisfaction survey, social media engagement, participation details, loyalty programs, your use of discount codes and promotions, customer order

description, customer service, attendance to trade exhibitions and events, trade exhibitions, litigation, testing and trials;

1.9. Usage details, such as information on how you browse or use our websites, platform, application products and services, products in customer's cart, wish list record, remind me flash sale record, follow-shop record, and timestamp of last click and Q&A record;

1.10. Marketing and communication details, such as your preference in receiving marketing from us, our affiliates, subsidiaries, business partners or other companies, and your communication preferences; and/or

1.11 Sensitive data, such as race, religion, political opinions, fingerprints, facial recognition, person identity information (biometrics), face, information from the iris recognition, physical or mental health or condition, genetic data, medical history, disability and criminal records.

If you provide Personal Data of any third party to us, e.g., their name, family name, address details, and telephone number for emergency contact, family member income, or if you use the service on any of our platforms with your consent, we can access and collect third party personal information relating to you, such as information on name, picture and/or phone number, as well as personal and contact information of family, friends, emergency contact persons, recommended persons or referrals accessible from your mobile number, etc.; please provide this Privacy Policy for their acknowledgement and/or obtaining consents if necessary.

We will only collect, use, or disclose sensitive data on the basis of your explicit consent or where permitted by law.

We only collect the information of children, quasi-incompetent persons, and incompetent persons where their parent or guardian has given their consent. We do not knowingly collect information from customers under the age of 20 without their parental consent when it is required, or from quasi-incompetent persons and incompetent persons without their legal guardian's consent. In the event we learn that we have unintentionally collected personal information from anyone under the age of 20 without parental consent when it is required, or from quasi-incompetent persons and incompetent persons without their legal guardians, we will delete it immediately or process only if we can rely on other legal bases apart from consent.

2. Why we collect, use or disclose your Personal Data

2.1. The purpose for which your consent would be required

Marketing and Communications: We collect, use and disclose your Personal Data to provide privileges and promotions, discounts, special offers, advertisements, notices, news, information and any marketing and communications about the products and services from us, Central Group, our affiliates, subsidiaries and business partners which we cannot rely on other legal bases.

Please contact [*] to manage your consent for marketing and communications.

2.2. The purposes we may rely on and other legal grounds for processing your Personal Data

We may also rely on (1) contractual basis, for our initiation or fulfilment of a contract with you; (2) legal obligation, for the fulfilment of the legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and the legitimate interests of third parties; (4) vital interest, for preventing or suppressing a danger to a person's life, body, or health; and/or (5) public interest, for the performance of a task carried out in the public interest or for the exercising of official authorities.

We may collect, use and disclose your Personal Data for the following purposes

- 1) To provide products and services to you:** To enter into a contract and manage our contractual relationship with you; to support and perform other activities related to such services or products; to complete and manage bookings and to carry out financial transaction and services related to the payments including transaction checks, verification, and cancellation; to process your orders, delivery, and collections and returns; refund and exchange of products or services; to provide updates and on the delivery of the products, and to perform warehouse internal activities, including picking, packing, and labelling of packages; to verify warranty period; to provide aftersales services, including maintenance and facility reservation;
- 2) Marketing and Communications:** To provide privileges, offers, updates, sales, special offers, promotions, advertisements, notices, news, information and any marketing and communications about the products and services from us, Central Group, affiliates, subsidiaries and business partners.
- 3) Promotions, special offer, loyalty programs, reward programs, prize draws, competitions, and other offer promotions:** To allow you to participate or earn promotions, special offers, loyalty programs, reward program, sweepstakes, privilege, prize draws, competitions, and other offer/promotions (e.g., sending you reminder emails and transferring your Personal Data to business partners) to participate in activities and seminars, and all services related to advertising. This includes to process and administer your account registration, gift registration, event registration; for processing, collection, addition, exchange, earning, redemption, payment, and transfer of points; to examine your entire user history, both online and offline; to provide and issue gift vouchers, gift cards, and invoices;
- 4) Registration and Authentication:** To register, verify, prove, affirm, identify, and/or authenticate you or your identity;
- 5) To manage our relationship with you:** To contact and communicate with you as requested by you or in relation to the products and services you obtain from us, those within Central Group's data ecosystem, affiliates, subsidiaries and business partners; to handle customer service-related queries, request, feedback, complains, claims, disputes or indemnity; to provide technical assistance and deal with technical issues; to process and update your information; to facilitate your use of the products and services;
- 6) Personalization, profiling and data analytics:** To recommend products and services that might be of interest to you, identify your preferences and personalize your experience; to learn more about you, the products and services you receive and other products and services you may be interested in receiving; to measure your engagement with the products and services, undertake data analytics, data cleansing, data profiling, market research, surveys, assessments, behaviour, statistics and segmentation, consumption trends and patterns; profiling based on the processing of your Personal

Data, for instance by looking at the types of products and services that you use, how you like to be contacted; to know you better; to improve business performance; to better adapt our content to the identified preferences; to determine the effectiveness of the promotional campaigns, identify and resolve of issues with existing products and services; qualitative information development. For this purpose, we will collect, use and disclose your Personal Data for your interest and benefit and for legitimate interest and businesses of Central Group, affiliates, subsidiaries and our business partners where such interests and businesses are not overridden by your fundamental rights to personal data. We will request your consent where consent is required from time to time;

- 7) **To improve business operations, products, and services:** To evaluate, develop, manage, and improve, research and develop the services, products, system, and business operations for you and all of our customers within Central Group's data ecosystem, including but not limited to our business partners; to identify and resolve issues; to create aggregated and anonymized reports, and measure the performance of our physical products, digital properties, physical measurement of products performance, digital features and marketing campaigns as well as developing business models, model for loan consideration, insurance and debt collection model;
- 8) **To learn more about you:** To learn more about the products and services you receive, and other products and services you may be interested in receiving, including profiling based on the processing of your Personal Data, for instance by looking at the types of products and services that you use from us, how you like to be contacted and so on;
- 9) **Functioning of the sites, mobile application, and platform:** To administer, operate, track, monitor, and manage the sites and platform to facilitate and ensure that they function properly, efficiently, and securely; to facilitate your experience on the sites and platform; improve layout, and content of the sites and platform;
- 10) **IT Management:** For business management purpose including for IT operations, management of communication system, operation of IT security and IT security audit; internal business management for internal compliance requirements, policies, and procedures;
- 11) **Compliance with regulatory and compliance obligations:** To comply with legal obligations, legal proceedings, or government authorities' orders which can include orders from government authorities outside Thailand, and/or cooperate with court, regulators, government authorities, and law enforcement bodies when we reasonably believe we are legally required to do so, and when disclosing your Personal Data is strictly necessary to comply with the said legal obligations, proceedings, or government orders. This includes to provide and handle VAT refund service; issue tax invoices or full tax forms; record and monitor communications; make disclosures to tax authorities, financial service regulators, and other regulatory and governmental bodies, and investigating or preventing crime;
- 12) **Protection of our interests:** To protect the security and integrity of our business; to exercise our rights or protect our interest where it is necessary and lawfully to do so, for example to detect, prevent, and respond to fraud claims, intellectual property infringement claims, or violations of law; to manage and prevent loss of our assets and property; to secure the compliance of our terms and conditions; to detect and prevent misconduct within our premises which includes our use of CCTV; to follow up on incidents; to prevent and report criminal offences and to protect the security and integrity of our business;

13) Fraud detection: To verify your identity, and to conduct legal and other regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud). This includes to perform sanction list checking, internal audits and records, asset management, system, and other business controls;

14) Corporate transaction: in the event of sale, transfer, merger, reorganization, or similar event we may transfer your Personal Data to one or more third parties as part of that transaction;

15) Risks: To perform risk management, audit performance, and risk assessments; and/or

16) Life: To prevent or suppress a danger to a person's life, body, or health.

If you fail to provide your Personal Data when requested, we may not be able to provide our products and services to you.

3. To whom we may disclose or transfer your Personal Data

We may disclose or transfer your Personal Data to the following third parties who collect, use and disclose Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located in Thailand and areas outside Thailand. You can visit their privacy policies to learn more details on how they collect, use and disclose your personal data as you could also be subject to their privacy policies.

3.1. The company within Central Group's data ecosystem

As Central Insurance Services Ltd. is part of data ecosystem of Central Group which all collaborate and partially share customer services, products and systems including website-related platforms and systems, we may need to disclose or transfer your Personal Data to, or otherwise allow access to such Personal Data by other companies within Central Group's data ecosystem for the purposes set out in this Privacy Policy. Please see list of companies for further details <https://www.centralgroup.com/storage/pdpa/cg-pdpa-brc-intra-group-agreement-th.pdf>

3.2. Our service providers

We may use other companies, agents or contractors to perform services on behalf or to assist with the provision of products and services to you. We may share your Personal Data to our service providers or third-party suppliers including, but not limited to (1) infrastructure, internet, infrastructure technical, software and website, and IT service providers; (2) warehouse and logistic service providers; (3) payment service providers; (4) research agencies; (5) analytics service providers; (6) survey agencies; (7) auditors; (8) marketing, advertising media, and communications agencies; (9) call center; (10) campaign and event organizers; (11) sale representative agencies; (12) telecommunications and communication service providers; (13) payment, payment system, authentication, and dip chip service providers and agents; (14) outsourced administrative service providers; (15) data storage and cloud service providers; (16) verifying and data checking (Netbay and Department of Provincial Administration) service providers; (17) dispatchers; and/or (18) printing service providers.

In the course of providing such services, the service providers may have access to your Personal Data. However, we will only provide our service providers with the Personal Data that is necessary for them to perform the services, and we ask them not to use your information for any other purposes.

3.3. Our business partners

We may transfer your Personal Data to our business partners in the businesses of banking, finance, credit, loan, asset management, investment, insurance, credit cards, telecommunications, marketing, retail, e-commerce, warehouse, logistics, wellness, lifestyle products and services, spa and fitness, reward and loyalty program, and data analytics, including platform sellers or providers whom we may jointly offer products or services, or whose products or services may be offered to you. Data shared in this way will be governed by the third party's privacy policy and not this Privacy Policy.

3.4. Social networking sites

We allow you to login on our sites and platforms without the need to fill out a form. If you log in using the social network login system, you explicitly authorize us to access and store public data on your social network accounts (e.g. Facebook, Google, Instagram), as well as other data mentioned during use of such social network login system. In addition, we may also communicate your email address to social networks in order to identify whether you are already a user of the concerned social network and in order to post personalized, relevant adverts on your social network account if appropriate.

We also partner with certain third parties that allow you to enroll in their services or participate in their promotions. For example, certain companies allow you to use your loyalty program number or online services login to receive or register for their services. Additionally, your social network account provider allows you to connect your social network account to your online services account or log into your online services account from your social network account. When you enroll in those services, we will share your Personal Data to those third parties. If you do not want to share your Personal Data in this way, do not provide your loyalty or reward program number to third parties, do not use your online services account to register for third-party promotions and do not connect your online services account with accounts on third-party services. Data shared in this way will be governed by the third party's privacy policy and not this Privacy Policy.

3.5. Third parties required by law

In certain circumstances, we may be required to disclose or share your Personal Data in order to comply with a legal or regulatory obligations. This includes any law enforcement agency, court, regulator, government authority or other third party where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security, or safety issues.

3.6. Professional advisors

This includes lawyers, technicians and auditors who assist in running our business, and defending or bringing any legal claims.

3.7. Associations

We may transfer your Personal Data to other member associations, such as Thailand E-Payment Association (TEPA), Electronic Transactions Development Agency (ETDA), the Association of Confederation of Consumer Organization, Thailand (ACCOT), Foundation for consumers, the Thai Chamber of Commerce, Thai E-Commerce Association, Thai Retailers Association, Thai Shopping Center Association and the Ratchaprasong Intersection Group.

3.8 Assignee of rights and/or obligations

Third parties as our assignee, in the event of any reorganization, merger, business transfer, whether in whole or in part, sale, purchase, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock or similar transaction; will comply with this Privacy Policy to respect your Personal Data.

4. International transfers of your Personal Data

We may disclose or transfer your Personal Data to third parties or servers located overseas, which the destination countries may or may not have the same equivalent level of protection for Personal Data protection standards. We take steps and measures to ensure that your Personal Data is securely transferred and that the receiving parties have in place an appropriate level of protection standards or other derogations as allowed by laws. We will request your consent where consent to cross-border transfer is required by law.

5. How long do we keep your Personal Data

We retain your Personal Data for as long as is reasonably necessary to fulfil purpose for which we obtained it, and to comply with our legal and regulatory obligations. However, we may have to retain your Personal Data for a longer duration, as required by applicable law.

6. Security of your Personal Data

The Company recognizes the importance of maintaining the security of your Personal Data. Therefore, the Company endeavours to protect your information by establishing security measures for your Personal Data appropriately and in accordance with the confidentiality safeguard of Personal Data, to prevent loss, unauthorized or unlawful access, destruction, use, alteration, rectification or disclosure; provided, however, that the Company will ensure that the method of collecting, storing and processing of your Personal Data, including physical safety measures follow the information technology security policies and guidelines of the Company.

7. Cookies and how they are used

If you visit our websites, we will gather certain information automatically from you by using cookies.

Cookies are small pieces of information or text issued to your computer when you visit a website and are used to store or track information about your use of a website and used in analyzing trends, administering our websites, tracking users' movements around the websites, or to remember users' settings. Some

cookies are strictly necessary because otherwise the site is unable to function properly. Other Cookies allow us to enhance your browsing experience, tailor content to your preferences, and make your interactions with the site more convenient: they remember your username in a secure way, as well as your language preferences.

Most Internet browsers allow you to decide whether or not to accept cookies. If you reject, remove or block Cookies can affect your user experience and without cookies, your ability to use some or all of the features or areas of our websites may be limited.

In addition, some third parties may issue Cookies through our websites to serve ads that are relevant to your interests based on your browsing activities. These third parties may also collect your browser history or other information to determine how you reached our websites and the pages you visit when you leave our websites. Information gathered through these automated means may be associated with the Personal Data you previously submitted on our website.

8. Your rights as a data subject

Subject to applicable laws and exceptions thereof, you may have the following rights to:

- 1) **Access:** You may have the right to access or request a copy of the Personal Data we are collecting, using or disclosing about you. For your own privacy and security, we may require you to prove your identity before providing the requested information to you.
- 2) **Rectification:** You may have the right to have incomplete, inaccurate, misleading, or or not up-to-date Personal Data that we collect, use or disclose about you rectified.
- 3) **Data Portability:** You may have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to send or transfer such data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) in the case where we are collecting, using or disclosing such data on the basis of your consent or to perform a contract with you.
- 4) **Objection:** You may have the right to object to certain collection, use or disclosure of your Personal Data such as objecting to direct marketing.
- 5) **Restriction:** You may have the right to restrict the use of your Personal Data in certain circumstances.
- 6) **Withdraw Consent:** For the purposes you have consented to our collecting, using or disclosing of your Personal Data, you have the right to withdraw your consent at any time.
- 7) **Deletion:** You may have the right to request that we delete or de-identity Personal Data that we collect, use or disclose about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise, or defend legal claims.
- 8) **Lodge a complaint:** You may have the right to lodge a complaint to the competent authority where you believe our collection, use or disclosure of your Personal Data is unlawful or noncompliant with applicable data protection law.

9. Our Contact Details

If you wish to contact us to exercise the rights relating to your Personal Data or if you have any queries about your Personal Data under this Privacy Policy, please contact us or our Data Protection Officer at:

- 1) Central Insurance Services Ltd.
 - Commercial Insurance
 - 306 7/F D Central Silom Tower Silom Road Bangrak Bangkok 10500
 - 02 101-8811-20, E-mail : cis1@central.co.th

- 2) Data Protection Officer
 - Data Protection Officer
 - Data Protection Office, Central Group
22 Soi Somkid Ploenchit Road, Lumpini, Pathumwan, Bangkok, 10330 Thailand
 - email: dpo@central.co.th