

# Privacy Policy

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Assist America Asia Limited (hereinafter referred to as “we”, “us”, “our “ or “ours” depending on the context) take the privacy and protection of your Personal Data (as defined below) seriously.

Set forth below is information about our processing of your Personal Data, what rights you have, and how you can get in touch if you want to know more.

The reference to “Personal Data”, means any information relating to an individual which enables the identification of such individual, whether directly or indirectly, as defined in the applicable data protection legislation and also as listed below. We only collect Personal Data from you that is necessary to either provide you with services that you have requested, or to comply with statutory or contractual requirements or any other pertinent purposes in the course of our business operation. In the delivery of travel assistance services, you directly provide us with the majority of that data that we collect at the time of need. If you are unable to provide certain Personal Data which is necessary for us to provide our services to you or as required by law, we will not be able to engage our services.

Occasionally , we may update our Privacy Policy on our website. We encourage you to check our Privacy Policy periodically on our website, as the version of our Privacy Policy which is displayed on our website takes precedence over all previous versions. We will notify you of any changes to the Privacy Policy and obtain your consent, to the extent applicable and if required.

This Privacy Policy describes how we collect, use, and/or disclose Personal Data of individuals with whom we interact and whose personal data we handle in the course of our business or in connection with the services we provide. Those individuals include, but are not limited only to,

- (1) individual customers (either prospective or existing);
- (2) third party providers to a medical related and transport services and business partners, this includes authorized persons, directors, shareholders, employees, personnel, beneficial owners, persons who were ultimately given power of attorney to establish business relationship and any other persons in similar capacity, and contact persons (collectively referred to as “Connected Persons”) of our corporate customers or business partners as defined below;
- (3) visitors and users of our websites, social media platform, and any other individuals about whom we obtain personal data (e.g., your family member, spouse, dependent, trusted person, witness, claimants, complainants, joint policy holders)

(Together “you” or “your”).

Please read this Privacy Policy carefully to understand why and how we collect, use and/or disclose your Personal Data.

## Part A - Personal Data We Process

**Personal and contact details:** if you seek to use our travel assistance services in order to render services we may inquire about the following information: title, name, surname, maiden name, previous name, contact details (e.g. phone no., e-mail), contact details history, date of birth, gender, age, nationality, citizenship, marital status, residency, family status, signature, house registration address, contact address, working address, postal codes, country of birth, photo, moving photo, FATCA status.

**Government issued identification:** such as national identification card, passport, household registration, tax identification and other government-issued identification (e.g. green card), visa, work permit, company registration, company certificate, company seal certificate.

**Employment information:** such as current employer and how you became a subscriber of our services. Information which enables us to provide services to you and a reference number for enrollment.

## Part B - Personal Data of other persons

We may also collect Personal Data as specified in the above from other people that are providing information on your behalf and from our business partners.

If you provide Personal Data of a member, you represent and warrant that you have the authority to do so by:

- (i) informing such other person about this Privacy Policy;
- (ii) obtaining consent where applicable or rely on other legal basis necessary to permit us to use such Personal Data in accordance to this Privacy Policy;
- (iii) undertaking to verify the accuracy and completeness of Personal Data provided by you and to update us of any change to the Personal Data provided.

If for any reason you are concerned as to whether you are permitted to provide us with the other person's information, please contact us at the email address below prior to submitting any personal data.

We do not buy or rent information about our members. The data we collect is limited to the information that is voluntarily provided to us by you or an authorized party at the time services are requested.

## Part C - Cookie Policy

Our Site may use cookies, beacon and similar technologies to distinguish you from other users of our Site. This helps us to provide you with a good user experience and also allows us to improve our Site. A cookie is a small file of letters and numbers that we store on your browser or hard drive of your computer.



When information from Cookies directly or indirectly identifies an individual, whether alone or coupled with other information, we will treat such information as Personal Data under this Privacy Policy. You have the ability to accept or decline cookies by modifying the setting in your browser. If you would like to do this, please see the help menu of your browser.

We do not gather or use your personal data for advertising purposes via cookies (and similar technologies).

We may use the following types of cookies:

**Strictly necessary cookies:** These are cookies that are required for the operation of our Site. They include cookies that enable you to log into our secure Site;

**Analytical/performance cookies:** These allow us to recognize and count the number of visitors our Site and to see how visitors navigate our Site. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily; and by continuing to use the Site, you accept the use of cookies as outlined above.

#### **Part D - How we use your Personal Data and Why**

We collect use, and/or disclose your Personal Data on the legal basis of (1) contractual terms, for our initiation or fulfillment of a contractual performance with you or requested by you prior to engaging into contractual performance with us; (2) legal obligation, for fulfillment of our legal obligations; (3) legitimate interest, for the purpose of our legitimate interests and those of third parties, proportionate to your interest and fundamental rights and freedoms to the protection of your Personal Data; (4) vital interest, for the prevention or suppression of danger to a person's life, body, or health; (5) public interest, for the performance of tasks carried out in the public interest or for exercising of official authorities or duties; and/or (6) consent.

We will use the Personal Data you provide to us, together with other information, for the following limited purposes and to the extent a purpose is not identified below we do not gather or use your information:

**Identity verification:** to confirm your identity and eligibility when you contact us for travel assistance services through our office, via call center, email, website, social media accounts, and mobile applications.

**Provision of customer services:** to reply to questions as requested by you or in relation to our travel assistance services.

**Carry out other internal business administration:** to keep your information on record, to retain the documents and folders of individuals relating to services performed and inquiries about our services, to manage our infrastructure and business operations, to comply with our internal policies and procedures relating to IT, auditing, finance, accounting, billing and collections, business continuity and reporting, to perform our functions related to our businesses.

**Providing marketing communications:** We do not collect or use data to send you direct marketing offers by electronic and non-electronic means.

**Corporate transactions:** to transfer your Personal Data to one or more third parties, including companies, affiliates and subsidiaries, as part of the transaction in the event of merger such as, in sale, transfer, merger, reorganization or similar event.

**Complying with any regulatory or other legal requirements:** to comply with our legal obligations, rights or duties and/or legal proceeding under the applicable laws and laws outside your country of residence, to respond to investigation requests from public and governmental authorities.

**Dispute handling:** to solve disputes, to enforce our contracts, to establish, exercise or defense of legal claims and legal rights.

**IT Management:** to manage our internal and external IT operations and communication system including IT security, IT security audit, and IT recordkeeping and to set system access authority.

Where we collect Personal Data of you acting as a Connected Person and/or Business Partner, the following purpose also applies.

**Business Partners selection:** in order to arrange for travel emergency services, we will share the information that you provide on a necessary basis to various providers including medical providers, hospitals, clinics, doctors, airlines, ground transport providers, embassies and consult office as needed, medical escorts for the general purpose of evaluating your medical condition and the services you are eligible to receive.

**Business communications:** to also carry out business communication with you or the Business Partners, such as communicating with the Business Partners about our cases.

#### **Part E - Use of your sensitive Personal Data**

We will only collect, use, or disclose sensitive Personal Data on the basis of your explicit consent, except for establishment, defense, compliance or exercise of legal claims, for satisfying legal obligations in relation to substantial public interest or where information is disclosed to the public with explicit consent from you or where otherwise permitted by law. Where consent is required, we will ask separately for your consent via appropriate methods.

For the delivery of travel emergency services for which you are eligible, we will need to process your sensitive Personal Data as described above, to the extent that we need your explicit consent to process this category of Personal Data, we will provide details of this at the point of collection and seek your consent.

#### **Part F -Who we share your Personal Data with and why**

We are committed to protecting your privacy by restricting access to your Personal Data on a need-to-know basis.

We may also make your Personal Data available to the certain third parties, located both inside and outside of Thailand, who collect, use and/or disclose Personal Data for the purposes set forth under this Privacy Policy and for the sole purpose of arranging services on your behalf. For more information, you can view their privacy policies to learn more about how they collect, use and/or disclose your Personal Data.

#### **Our Business Partners**

We may disclose your Personal Data to the Business Partners as defined for the purposes listed in Part E.

#### **Governmental Authorities and Third Parties involved in Court Action**

We may also disclose your Personal Data with governmental, regulatory or other public authorities in Thailand and overseas as applicable (including, but not limited to the Office of Insurance Commission on, Revenue Department , Bank of Thailand, Anti-Money Laundering Office, Securities and Exchange Commission, Legal Execution Department, Office of The Consumer Protection Board, Department Of Provincial Administration, National Police Bureau, National Anti - Corruption Commission and/or any other law enforcement authorities, and courts); and third-party participants in legal procedures or other third party if we believe to be necessary or appropriate to comply with our legal obligations, defend legal rights or positions of us or otherwise the rights of any third party or individuals' personal safety, and allow us to pursue available remedies or limit our damages.

### **Assignee of Rights and/or Obligations**

In a normal course of business, we may disclose your Personal Data to third parties as our assignee, in the event of any reorganization, merger, amalgamation, 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. We take reasonable steps to ensure that such third parties will comply with this Privacy Policy to respect your Personal Data.

### **Part G - International transfer of Personal Data**

We may transfer your Personal data to third parties, such as Assist America affiliated companies, service providers, and governmental or public authorities (e.g. for the purpose of complying with FATCA), located in other countries (including, but not limited to Singapore, Hong Kong, India, United States, United Kingdom, Australia, Germany, Japan, Indonesia, the Netherlands, Malaysia) in order to carry out the purposes specified above. Where there is such a transfer, it will be done based on your consent or other basis in compliance with the applicable laws.

To the extent we transfer your Personal Data to a country with a level of data protection standards not equivalent to Thailand, we will advise you of same.

### **Part H - We keep your Personal Data for a set amount of time**

Your Personal Data will be stored for the period necessary to allow us to fulfill, satisfy or achieve the purposes specified in Part F above except where a longer retention period is required or permitted by law or as long as you are our customer and for a period of ten years after the end of the customer relationship, or longer if required by law or to satisfy the purposes specified in above. In case of legal necessity or achieving the purposes as set out above, there may be specific circumstances where it is necessary for us to retain your Personal Data for longer (such as when a dispute arises.)

### **Part I - Minor, Incompetent person, and quasi-incompetent person**

As required by law in certain cases, we cannot collect, use, and/or disclose the Personal Data of minors, quasi-incompetent persons, and incompetent persons in absence of their parental or legal guardian consent. If you are under the age of twenty, quasi-incompetent persons, or incompetent persons, please ensure that consent from your legal guardians are obtained when it is required. Where we learn that we have unintentionally collected Personal Data from anyone under the age of twenty 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.

### **Part J – You Are in Control**

Subject to the provisions of the data protection law, you may have a number of rights regarding the collection, use, disclosure and/or transfer of your Personal Data, including:

**Access:** you can request a copy of your Personal Data (we have the right to charge a reasonable fee to complete this request where permitted by law).

**Rectify:** you can request that we correct anything that is wrong or complete any incomplete Personal Data.

**Lodge a complaint:** you can complain to a data protection authority or the competent authority where you believe our collection, use and disclosure of your Personal Data is unlawful or non-compliant with applicable data protection law where applicable. We would, however, appreciate the chance to deal with your concerns before you approach the authority, so please contact us first.

**Deletion:** you can ask us to delete your Personal Data if it is no longer needed for the purposes set out in this Privacy Policy or if there is no other legal basis for the processing.

**Objection:** you can object to the use of your Personal Data based on legitimate interests.

**Data Portability:** you can request that we provide a copy of your Personal Data in a structured and commonly used format in certain circumstances.

**Restriction:** you can limit how we use your Personal Data in certain circumstances; and

**Withdraw Consent:** you have the right to withdraw your consents you have given for the processing of your Personal Data any time, the withdrawal of consent will not affect the lawfulness of the collection, use and/or disclosure of your personal data and sensitive data based on your consent before it was withdrawn. If you do not provide (or withdraw) your consent, we may not be able to provide certain or all of our services to you.

Your request for exercising any of the above rights may be limited by the applicable laws. There may be certain cases where we can reasonably and lawfully decline your request, for example, due to our legal obligation or court order.

If you want to exercise your rights, or would like an explanation about these rights, we have explained how you can get in touch in the Contact Us section.

If you do need to speak to us, the data controller for your Personal Data is Assist America Asia Limited. We may monitor or record calls or any other communication we have with you. This might be for training, or security purposes.



If you want to exercise your rights in Part J or if you require any other information about any other part of this notice, you can contact us as follows:

Email to us at: [AACompliance@assistamerica.com](mailto:AACompliance@assistamerica.com)

### **Customer Service Center**

Email us at: [services@assistamerica.com](mailto:services@assistamerica.com)

### **Data Protection Officer (DPO)**

Assist America Asia Limited

Email DPO at: [AACompliance@assistamerica.com](mailto:AACompliance@assistamerica.com)

Business Partners is defined as follows:

**Business partners:** e.g., third party providers of medically related services of any kind

**Service providers:** e.g., service providers who provide administrative, telecommunications, computer, information technology, data processing and storage, customer satisfaction analysis, payment, printing and logistics, redemption, call center service, emergency service, support and hosting service, claim facilitation, IT service and platform service, data management service, data storage and cloud service, smart underwriting provider, advertising, marketing and market research and analysis service, or other services to us to enable us to operate our business, including other third-party vendors, suppliers and other outsourced service providers that assist us in carrying out business activities;

**Others:** e.g., professional advisors who may have access to your Personal Data, including medical professionals.