#### **Privacy Notice**

DAOL (THAILAND) PUBLIC COMPANY LIMITED, DAOL SECURITIES (THAILAND) PUBLIC COMPANY LIMITED, DAOL INVESTMENT MANAGEMENT COMPANY LIMITED, DAOL REIT MANAGEMENT (THAILAND) COMPANY LIMITED, and DAOL LEND (THAILAND) COMPANY LIMITED (collectively referred to as "DAOL Financial Group (Thailand) ", "we", "us" or "our"), including any fund under our management or establishment and Real Estate Investment Trust: REIT, recognize the importance of protecting your Personal Data and therefore issue this Privacy Notice in order to help you understand our guidelines on protecting your Personal Data, as well as to describe our grounds for and means of collection, use, disclosure, and/or cross-border transfer of your Personal Data when you use our services or products through any channel. We recommend that you read and understand this Privacy Notice, of which details are as follows:

DAOL Financial Group (Thailand) will collect, use, or disclose your Personal Data merely to the extent necessary to fulfil any of the following purposes as specified in the Privacy Notice or any other purposes as specified in any documents or electronic means regarding giving consent for the collection, use, or disclosure of your Personal Data.

This Privacy Notice applies to how we collect, use, disclose and/or international transfer your Personal Data in relation to the use of our services or products through channels, including our branches, websites, application, call center, activity and exhibition, online contact channel, other locations, other service channels or our partners' service channels. This Privacy Notice does not apply to the use of other services or products that do not belong to us or are not under our control.

In accessing and using our services and/or products, you may be required to provide your Personal Data, which could be used to identify your identity, in order to enable your transactions in relation to our services and/or products. Such Personal Data includes information as specified in service application form, documents for identity verification, which are supporting documents of the application for our services and/or products and financial information. We may process your Personal Data and the source of your Personal Data that we collect, use, and/or disclose in any form, including document, photo. and/or electronic form.

This Privacy Notice applies to the Personal Data (as defined in Clause 1 below) of Personal Data subjects including: (1) our individual customers, including prospective customers (potential customers), current customers, former customers, and individual persons related to such individual customers; (2) our employees, personnel, staffs, representatives, shareholders, authorized persons, directors, contact persons, agent, and other individual persons related to our corporate customers, including prospective customers (potential customers), current customers and former customers; (3) individual persons who are our former, existing. or future outsourcing service providers or vendors; and (4) other individual persons who visit our website, application, and/or other online channels as well as other individual persons who were, are, or will be our external service providers or partners; (4) holders of our securities in which we are involved including their attorney or proxies of such persons; and (5) any other persons who communicate with us through the channels or for whom we provide services, either directly or through our partners or agents.

However, we will retain ownership of the Personal Data that we have already processed.

Individual persons, individual customers, corporate customers, external service providers, vendors, or business partners will be collectively referred to as "you" or "your".

This Privacy Notice is prepared in Thai and English translation. In the event of any inconsistency, the Thai Privacy Notice shall prevail.

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บริษัท ดาโอ (	ประเทศไทย)	) จำกัด (	(มหาชน)	)	

87/2 CRC Tower, 52nd Floor, All Seasons Place, Wireless Road, Lumpini, Pathumwan, Bangkok 10330 TAX ID 0107562000467 เลขที่ 87/2 อาคารซีอาร์ซีกาวเวอร์ ชั้นที่ 52 ออลซีซั่นส์เพลส ถนนวิทยุ แขวงลุมพินี เขตปทุมวัน กรุงเทพมหานคร 10330 เลขประจำตัวผู้เสียกาษีอากร 0107562000467

#### 1. What Personal Data we hold about you

"Personal Data" means any identified or identifiable information about you as listed below. We may collect your Personal Data directly from you (e.g. through our staffs, call center or other service channels) or indirectly from other sources (e.g. any company in DAOL Financial Group (Thailand), public sources, social media where you have set as public, external service providers, advisors, business partners, agencies, organizations, or any person having a contractual relationship with us such as third-party custodians, subcustodians, brokers, domestic and international government agencies, your representatives or agents, any authorized person in accordance with the laws, or any person you have given permission or consent for disclosing your Personal Data to us, provided that those data providers have complied with the Personal Data protection laws). The types of Personal Data that we collect depend on the relationship between you and us as well as the services or products that you required from us. Furthermore, the types of Personal Data we collect depend on the relationship between the clients or juristic persons and us, as well as the services or products that you required from us.

"Sensitive Data" means Personal Data classified by law as sensitive data.

#### Individual Customers

Your Personal Data that we collect, use, disclose and/or transfer to other countries, includes but not limited to the following:

- (a) Identity Data such as name, surname, date of birth, age, nationality, identification number, passport number (for foreigners), tax identification number, marital status, education, occupational data (e.g. occupation, work place, job title, salary), signature, photo, house registration certificate, suitability test, FATCA information, investment purpose, including Sensitive Data as specified by laws and this Privacy Notice
- (b) Contact Details such as address specified in identification card, address specified in house registration certificate, current address, work address, telephone number, mobile phone number, FAX number, email address, and other identification number for communication via other electronic channels;
- (c) Financial Data such as account number, type of account, Promptpay data, transaction data, financial history, information from database of the Legal Execution Department, financial status (e.g. income, wealth, asset and debt, evidence of income and expense, credit information, record of borrowing, record of credit, and record of repayment), financial requirement and goal, asset, income and expense, payment information and application information for our services and products;
- (d) Transaction Data such as account number for each product, account limit, balance, free margin, asset value, total liabilities. Profit and loss, securities trading history, settlement history, delivery history, debt settlement history, cash deposit and withdrawal history, securities deposit and withdrawal history, and transactions in relation to your assets;
- (e) **Communication Data** such as a copy of identification card, a copy of passport, photos and/or voice form CCTV, telephone call or our online channels or any other electronic channels;
- (f) Other Personal Data collected, used, and disclosed in connection with the relationship with us, such as information provided to us in the agreements, forms, surveys, and questionnaires; information collected from your participation in our business activities, marketing, seminars, social events, and information from analytics, research, and profiling that we obtain from observing your behaviour and/or location through cookies, technology, or any other means for product development purposes; and
- (g) **Technical Data** such as information about your preference in search for or use data via electronic channels, your activities on social media which include financial information, member login information, IP address, web beacon, log, device ID, device model and type, network, connection

information, access information, single sign-on (SSO), Login log, access time, time spent on the page, smart device information, verification information, browsing information, location, spending patterns or search history with relation to our services and/or products, information from cookies or connection with other websites that you use.

#### Corporate customers or external service providers or partners

Personal Data of authorized directors, authorized persons, shareholders, agents, other individual persons related to you that we collect, use, disclosed and/or transfer to other countries, includes but not limited to the following:

- (a) **Identity Data** such as name, surname, date of birth, age, nationality, identification number, passport number (for foreigners), tax identification number, biography information, education, occupational data (e.g. occupation, work place, job title, salary), signature, photo, house registration certificate, including Sensitive Data as specified by laws and this Privacy Notice;
- (b) Contact Details such as address specified in identification card, address specified in house registration certificate, current address, work address, telephone number, mobile phone number, FAX number, email address, and other identification number for communication via other electronic channels;
- (c) Contact Details such as address specified in identification card, address specified in house registration certificate, current address, work address, telephone number, mobile phone number, FAX number, email address, and other identification number for communication via other electronic channels;
- (d) Other Personal Data collected, used, disclosed in connection with the relationship with us such as information provided to us in the agreements, forms, surveys, questionnaires, information collected form your participation in our business activities, marketing, seminars, social events, and information from analytics, research, and profiling that we obtain from observing your behaviour and/or location through cookies, technology, or any other means for product development purposes; and
- (e) **Communication Data** such as a copy of identification card, a copy of passport, photos and/or voice form CCTV, telephone call or our online channels or any other electronic channels;

Your Sensitive Data, that we collect, use, disclose and/or transfer to the other countries, includes but not limited to the following:

- (a) fingerprints, finger vein, facial recognition, iris recognition, voice recording, and any other similarly sensitive Personal Data for the purpose of proofing and authenticating your identity and your transactions through the identity proofing and authentication service;
- (b) religion and/or blood type only as appeared on the copy of your identification card for the use as evidence solely for the establishment, compliance, exercise or defense of legal claims;
- (c) criminal records for public interest in relation to protecting , dealing with, and minimizing risks which may occur as a result of any illegal activities such as money laundering, terrorism or public fraud; and
- (d) information regarding disability, health or dysfunction, which will be used to provide our services to you as required by laws.

We will collect, use, disclose and/or transfer to other countries your Sensitive Data merely to the extent necessary to fulfill any of the following purposes as specified in Clause 2, and we will procure appropriate measures in order to protect your fundamental rights and benefits.

In case you deny the necessary information to us for providing our services, we may not provide you our

services in part or in full. In the event that you give us the Personal Data of another person, you are

#### DAOL (THAILAND) PUBLIC COMPANY LIMITED บริษัท ดาโอ (ประเทศไทย) จำกัด (มหาชน)

responsible for notifying that person to acknowledge our Privacy Notice or our services terms and conditions

including obtaining their consent before disclosing that person's Personal Data to us.

## 2. What are our purposes of the collection, use and disclosure of your Personal Data

We collect, use, disclose and/or cross-border transfer your Personal Data to the extent necessary to fulfill any of the purposes set out in the table below. We will assess your Personal Data based on lawful basis, which shall be vary depending on services, products, or relationship that you had, will have or have with us.

Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing	
Operating and rendering services or products to you, such as account opening, financial planning, loan application service-related contacts, emergency contacts, and other services or products.	<ul> <li>Where necessary to fulfil contractual obligations between you and us. (Contractual Basis)</li> <li>It is in our legitimate interest to render appropriate services or products to you. (Legitimate Interest)</li> </ul>	
Offering services and products of each company in DAOL Financial Group (Thailand) or our business partners that are similar or related to the services and/or products you have with us, provided that you did not show any intention to prohibit a telephone contact or we are not prohibited by any other applicable laws, as well as conducting research, recording statistical data, and analyzing your data for the purpose of recommending such services and/or products.	It is in our legitimate interest (Legitimate Interest)	
Offering service and/or products of each company in DAOL Financial Group (Thailand) or our business partners <sup>1</sup> that are not similar unrelated to the services and/or products you have with us, as well as conducting research, recording statistical data, and analyzing your data for the purpose of recommending such services and/or products.	Where your consent is given to us (Consent)	
Disclosing your Personal Data e.g. name, surname and your contact information to any third party for marketing purpose.	<ul> <li>Where your consent is given to us (Consent)</li> </ul>	
Processing your request to participate in our activities or projects e.g. promotional activities, training, seminars, receiving news and updates	<ul> <li>Where necessary to fulfil contractual obligations between you and us. (Contractual Basis)</li> </ul>	

<sup>1</sup> Our business partners include (1) We Digital Insurance Broker Company Limited and (2) DAOL Digital Partner Company Limited. We may have additional partners in the future, about which we will inform you.

DAOL (THAILAND) PUBLIC COMPANY LIMITED บริษัท ดาโอ (ประเทศไทย) จำกัด (มหาชน)

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Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing
Facilitating you and for benefit of providing you with a service requesting the information you have with all our companies, including rendering services in connection with our services or products which your have or will have with us	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> <li>Where the consent has been given to us (Consent)</li> </ul>
Communicating with you e.g. sending e-mail, letter, or any document to you as prescribed in the agreement or by laws. Conducting Know Your Customer and/or	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> <li>Where the laws require us (Legal Obligation)</li> <li>Where the laws require us (Legal Obligation)</li> </ul>
Customer Due Diligence for accurate, true, and up-to-date information.	
.Preventing and detecting suspicious transactions to mitigate and reduce risks that may occur or lead to illegal activities such as money laundering, terrorism, or public fraud, including the sharing of personal information to improve our work standards regarding security management and mitigate the risk.	<ul> <li>Where necessary as required by applicable laws (Legal Obligation)</li> <li>It is our legitimate interests (Legitimate Interest)</li> <li>Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in (Substantial Public Interest)</li> </ul>
Reporting your Personal Data to government agencies which are our regulators or when receiving a summon or suspension from government agency or court.	<ul> <li>Where necessary as required by applicable laws (Legal Obligation)</li> </ul>
Operating in compliance with our internal procedures e.g. For each account opening and each transaction, we have to verify and identify if you are a true owner of such account, as well as checking other facts to support your request.	<ul> <li>Where necessary to fulfil contractual obligations between you and us. (Contractual Basis)</li> <li>It is in our legitimate interest (Legitimate Interest)</li> <li>Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in (Substantial Public Interest)</li> </ul>
Analyzing risk based on your behavior, including Credit Scoring Test or Suitability Test.	<ul> <li>Where necessary to fulfil contractual obligations between you and us. (Contractual Basis)</li> <li>Where necessary as required by applicable laws (Legal Obligation)</li> <li>Where your consent is given to us for the collection of your Personal Data via various channel, including your electronic</li> </ul>

#### DAOL (THAILAND) PUBLIC COMPANY LIMITED บริษัท คาโอ (ประเทศไทย) จำกัด (มหาชน)

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Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing	
	devices, for the aforementioned purpose. (Consent)	
Generating relationship with customers, external service providers or business partners who have disclosed your Personal Data to us, such as entering into an agreement with individual or corporate customers, external service providers or business partners e.g. loan application documents verification/ request for our services and/or products, which information verification is required. We may need to verify such documents that might contain third parties' and your Personal Data. In case of entering into an agreement with juristic person that might contain third parties' and your Personal Data. Such juristic person shall fully comply with the Personal Data protection law and this Privacy Notice.	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
Maintaining relationship with customers, such as complaint management, satisfactory surveys or offering of special benefits to customers without marketing purposes.	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
Processing data and statically analyzing data, of which the result will not be identifiable to you.	<ul> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
Analyzing, researching, and profiling in relation to you received from the observation of your behavior and/or your location by using Cookies and other technologies or electronic means. This is to develop and offer services and/or products of us and/or our business partners to suit your personal demand as well as enhancing your special benefit. (Behavioral Advertising)	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> <li>It is in our legitimate interest (Legitimate Interest)</li> <li>Where your consent is given to us (Consent)</li> </ul>	
CCTV recording of visitors when entering our premises, including branches for security within our office buildings or branch areas	<ul> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
Recording videos and/or voices through telephone or any other electronic means to verify your requests orders, or complaints, or for analyzing, improving and developing our products and/or services, including training our employees for such proposes	<ul> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
Interviewing for the use in publishing of any form of media such as publication and electronic media	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> </ul>	

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Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing	
through various channels, such as our websites, social network, internal email to employees for public relations and advertisements.	<ul> <li>It is in our legitimate interest (Legitimate Interest)</li> <li>Where your consent is given to us (Consent)</li> </ul>	
Recording images, videos, or voices in trainings, seminars, or other activities that we organized or supported such as annual general meetings, in order to make a media in any form, such as, printing or electronic media through any channel such as our websites, social media and internal communication email for the advertising and public relation purposes	Where your consent is given to us (Consent)	
Using your fingerprint, finger vein, facial recognition, iris recognition, voice recording, including other Sensitive Data correspondingly for verification and authentication of your identity and transactions using the digital identity verification and authentication services.	<ul> <li>Where your consent is given to us (Consent)</li> <li>Where necessary as required by applicable laws (Legal Obligation)</li> </ul>	
Collecting and using your Sensitive Data such as religion, blood type only as shown on the copy of Identification Card.	<ul> <li>Where necessary for the establishment of legal claims, the compliance to the applicable laws or the defense of legal claims</li> </ul>	
Collecting information on your disability, health and/or physical disorder to offer the services suitable for you and to analyze your risk level upon receiving services or product by us or through us.	<ul> <li>Where necessary as required by applicable laws (Legal Obligation)</li> <li>Where your consent is given to us (Consent)</li> <li>Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in (Substantial Public Interest)</li> </ul>	
Managing risk, supervising, managing internal operation, and transferring data amongst DAOL Financial Group (Thailand), to which the appropriate safety measures will be applied, for the purposes as specified in the Agreements mutually agreed by the companies in DAOL Group.	<ul> <li>It is in our legitimate interest (Legitimate Interest)</li> <li>Where necessary to fulfil contractual obligations between you and us (Contractual Basis)</li> <li>Where necessary as required by applicable laws (Legal Obligation)</li> </ul>	
Collecting debt and enforcing obligations arising from our agreement, liabilities, legal rights, investigation, seizure, and take over assets or property, including bringing into auction or any other activities in a similar way,	<ul> <li>Where necessary to carry out our agreement with you (Contractual Basis)</li> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
Transferring of a group debt sale to third persons such as sale of non-performing loan (NPL) to an securities finance corporation, or asset management company	<ul> <li>It is our legitimate interests to disclose such Personal Data to third parties (Legitimate Interest)</li> </ul>	

#### DAOL (THAILAND) PUBLIC COMPANY LIMITED บริษัท คาโอ (ประเทศไทย) จำกัด (มหาชน)

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Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing	
Using and disclosing of your Personal Data for the purposes of transfer or sell the business, assets or shares of any DAOL Group companies (whether in whole or in part) or disclosing data for the due diligence as a normal practice of us, to which the appropriate safety measures will be applied. Managing the securities' issuer in relation to the securities holders or any assignees appointed proxies, members of the provident fund, fund administrator, securities registrar, and Trusts registrar	<ul> <li>Where necessary as required by applicable laws (Legal Obligation)</li> <li>It is in our legitimate interest to disclose or receive such Personal Data from third parties (Legitimate Interest)</li> <li>Where necessary to fulfil contractual obligations between you and us (Contractual Basis)</li> <li>Where necessary as required by applicable laws (Legal Obligation)</li> <li>It is in our legitimate interest (Legitimate Interest)</li> </ul>	
The disclosure of your Personal Data in accordance with rules and regulations prescribed by organizations or regulations in a foreign country, or in accordance with such foreign country's laws or international convertion.	<ul> <li>Where necessary to fulfil contractual obligations between you and us (Contractual Basis)</li> <li>Where necessary as required by applicable laws (Legal Obligation)</li> </ul>	

However, we may process your Personal Data in accordance with the aforementioned purposes through our existing technologies or as we may occupied in the near future, including but not limited to the use of Artificial Intelligence (AI), Cloud Computing, Block Chain, and Biometric Comparison.

In the event we do not obtain your consent, it may affect your ability to use our services and/or products, your convenience, and the performance of contractual obligations. You may also be damaged and lose opportunities, and it may affect DAOL Group's and your compliance to the applicable laws.

In addition, we may transfer your Personal Data outside of Thailand in order to carry out the aforementioned purposes merely in accordance with clauses 7 Cross-border transfer of your Personal Data.

## 3. How DAOL Financial Group (Thailand) will share your Personal Data with

Upon your explicit consent, or as necessary for the performance of contractual obligations, or as required by laws, substantive public interest, execution of duties in the exercise of state authority, or for our legitimate interest, we may send, transfer and/or disclose your Personal Data to the following third parties, situated both in Thailand and foreign countries. We will operate to the extent permitted by laws and will procure sufficient Personal Data protection standards.

- (a) Companies in DAOL Financial Group (Thailand) such as DAOL (THAILAND) PUBLIC COMPANY LIMITED, DAOL SECURITIES (THAILAND) PUBLIC COMPANY LIMITED, DAOL INVESTMENT MANAGEMENT COMPANY LIMITED, DAOL REIT MANAGEMENT (THAILAND) COMPANY LIMITED, and DAOL LEND (THAILAND) COMPANY LIMITED.
- (b) Our business partners to which we may transfer your Personal Data to a person acting on your behalf or otherwise involved in the provision of any type of products and/or services offered by us, such as life insurance companies, non-life insurance companies, beneficiaries, account nominees, intermediaries (e.g. third-party securities companies or asset management companies), custodians,

correspondents, agents, vendors, co-brand partners, market counterparties, issuers of products, or global trade repositories to whom we have the right to disclose your Personal Data in the course of providing products and services to you and/or to whom you authorize us to disclose your Personal Data; provided that these recipients agree to treat your Personal Data in compliance with the Personal Data protection laws and in accordance with this Privacy Notice.

- (c) Our external service providers, such as IT service providers, advertising agencies, research agencies, cloud service providers, debt collectors, consulting firms, auditor, and law firms.
- (d) Financial institutions and payment service providers such as banks that provide payment service for your transactions.
- (e) Social Media such as Facebook, Line for communicate marketing messages to you and for the collection of your data to analyze for services and/or products development.
- (f) Third parties such as assignees or transferees which may assign, transfer, or novate, to whom we novate our rights, to the extent permitted under the terms and conditions of the agreement between you and us. We may disclose or transfer your Personal Data to assignees or transferees, including prospective assignees or transferees; provided that these recipients agree to treat your Personal Data in compliance with the Personal Data protection laws and in accordance with this Privacy Notice.
- (g) Other third parties in relation with the business transfer which we may disclose or transfer your Personal Data to our business partners, investors, significant shareholders, assignees, prospective assignees, transferees, prospective transferees in the event of any reorganization, restructuring, merger, acquisition, sale, purchase, joint venture, assignment, dissolution or any similar event involving the transfer or other disposal of all or any portion of our business, assets of shares. In case of the occurrence of any event specified above, the recipients shall comply with this Privacy Notice.
- (h) Government agencies regulating the DAOL Financial Group (Thailand) or registration authorities such as Bank of Thailand, Securities and Exchange Commission, Stock Exchange of Thailand, securities depository, Thailand Clearing House, Office of Insurance Commission (for the purposes of regulating and promoting insurance business in accordance with the Insurance Commission Act, Life Insurance Act and/or Non-Life Insurance Act. For more information, please see the Privacy Policy of Office of Insurance Commission at www.oic.or.th), court, National Police Office, Department of Business Development, or any other government agencies which have the authority to summon subpoena or percept your Personal Data or assets such as Legal Execution Department and Revenue Department.
- (i) Agencies, organizations or any other juristic persons entering into an agreement with us or having us as counterparty or having relationship with us, such as the company of your interest to invest.
- (j) Other persons or agencies which are necessary for the fulfillment of the purposes as specified in Clause 2.

## 4. What are your rights in relation to your Personal Data

You may exercise the following rights:

4.1 Right of access

You may have the right to access and request a copy of your Personal Data which is under our responsibilities or request us to disclose the sources of your Personal Data which you have not given consent.

#### 4.2 Right to rectification

You may have the right to request us to rectify your Personal Data in order for data to be accurate, up-to-date and not misleading.

4.3 Right to erasure

#### DAOL (THAILAND) PUBLIC COMPANY LIMITED บริษัท ดาโอ (ประเทศไทย) จำกัด (มหาชน)

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- (1) Such Personal Data is no longer necessary in relation to the purposes for which collected, used or disclosed;
- (2) You have withdrawn consent and where we have no legal ground for such collection;
- (3) You have objected some data processing activities, which we could not reject such request;
- (4) You have objected the data processing activities for direct marketing purpose; and
- (5) It is an unlawful collection, use, disclosure of Personal Data
- 4.4 Right to Restriction of Processing

You may have the right to restrict our data processing of your Personal Data in case of the following events:

- (1) The processing of Personal Data is no longer necessary, but the collection of Personal Data still remain necessary for exercising legal claims;
- (2) It is an unlawful processing of Personal Data; however, you prefer the restriction of data processing rather than deletion or destruction of your Personal Data;
- (3) During the verification on the accuracy of Personal Data upon your request; and
- (4) During the proving process for the rejection of right to objection
- 4.5 Right to Data Portability

You may have the right to obtain Personal Data we hold about you, in a structured, electronic format and able to be used or disclosed by automatic means, including (a) request us to send or transfer your Personal Data in such format to other data controllers in case the electronic means is allowed, (b) request to directly obtain your Personal Data in a structured, electronics format unless it is impossible as the electronic means is not allowed.

4.6 Right to object

You may have the right to object the collection, use, or disclosure of your Personal Data in the following cases:

- (1) The collection, use, and/or disclosure of Personal Data for the purpose of direct marketing
- (2) The collection, use, and/or disclose of Personal Data for the purpose of scientific, historical, and statistic research, unless it is necessary for our operation with regards to public interest;
- (3) The collection of data which is necessary for our operation with regards to public interest or for our legitimate interest unless we are able to demonstrate a more important lawful basis or it is to establish legal claims, to comply with the laws, to exercise the right to claim, or to defense of legal claims.
- 4.7 Right to Withdraw Consent

You may have the right to withdraw your consent given to us for the collection, use or disclose your Personal Data at any time, unless such consent withdrawal is subject to the restriction by laws or the contractual obligation with us that benefits you. For example, you are still using our services and/or products or you still have debt obligation with us

You may exercise your right to withdraw consent using the same channel that your consent was given.

4.8 Right to lodge a complaint

87/2 CRC Tower, 52nd Floor, All Seasons Place, Wireless Road, Lumpini, Pathumwan, Bangkok 10330 TAX ID 0107562000467 เลขที่ 87/2 อาคารซีอาร์ซีกาวเวอร์ ชั้นที่ 52 ออลซีซั่นส์เพลส ถนนวิทยุ แขวงลุมพินี เขตปทุมวัน กรุงเทพมหานคร 10330 เลขประจำตัวผู้เสียกาษีอากร 0107562000467 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 the applicable Personal Data protection law.

Your above-mentioned rights are subject to the relevant factors and we may not be able to proceed according to your request if we hold the legitimate interest to collect such Personal Data, for example, you still have our securities trading account, loan account or use our other services, or if we need to retain your Personal Data for the period as specified by the applicable laws even after the termination of relationship between you and us.

If you wish to exercise your rights, you may request for the Data Subject Right Request Form DAOL Group customer service at E-mail: <u>contactcenter@daol.co.th</u> or Tel: 02-351-1800 and submit the form to E-mail: <u>dpo@daol.co.th</u> or any other channels as specified for each transaction. Your request will be considered and dissolved within 30 working days after the receipt of such request, unless otherwise as specified by laws.

#### 5. How DAOL Financial Group (Thailand) protect your Personal Data

We maintain technical, physical, and administrative security measures designed to provide an optimal protection of your Personal Data form loss, misuse, unauthorized access, disclosure, modification, such security measures include firewall, data encryption, physical access control when accessing data center, data access control. While we maintain our security standard for systems and services, you are responsible for maintaining the security and privacy of your password and information related to your account, as well as verifying that your Personal Data is accurate and up-to-date.

We established policies, manuals and minimum standards for handling our customers' Personal Data, such as IT security standard, and we will review and improve such policies, manuals and minimum standards from time to time as specified by laws.

In addition, our personnel, employees or external service providers are obliged to keep our customers; Personal Data confidential in accordance with the non-disclosure agreement signed with DAOL Group.

#### 6. Cookies

We use cookies technology to secure our websites, to enhance the efficacy of using our websites and online services for you, and to develop our services and/or products to suit your needs or to expand your benefits. Cookies are small pieces of information issued to the hard drive of your computer when you visit a website to collect and record your Personal Data that you filled, or to collect what you filled by not addressing any specific person. You can check your Cookies status or reject the use of Cookies in your browser. For more information, please see Cookies Policy or <a href="https://www.daol.co.th/personal-data-protection/cookies-policy">https://www.daol.co.th/personal-data-protection/cookies-policy</a>.

## 7. International transfer of your Personal Data

For the purposes as mentioned above, we may disclose or transfer your Personal Data to third parties or servers located overseas, of which the data protection standard may not be the same as Thailand. In addition, we have taken steps and measures to ensure that your Personal Data is securely transferred, and that the recipients have an appropriate data protection standard in place, and that such transfer is lawful as permitted by the exceptions under the laws.

8. Personal Data of minors, quasi-incompetent or incompetent persons

87/2 CRC Tower, 52nd Floor, All Seasons Place, Wireless Road, Lumpini, Pathumwan, Bangkok 10330 TAX ID 0107562000467 เลขที่ 87/2 อาการซีอาร์ซีทาวเวอร์ ชั้นที่ 52 ออลซีซั่นส์เพลส ถนนวิทยุ แขวงลุมพินี เขตปทุมวัน กรุงเทพมหานคร 10330 เลขประจำตัวผู้เสียกาษีอากร 0107562000467 Our activities are not generally aimed at minors, quasi-competent or incompetent persons, and we do not knowingly collect Personal Data from minors without their parental consent, or from quasi-competent persons, or incompetent persons without their legal guardian's consent. If you are minors, quasi-competent or incompetent persons and wish to engage in a contractual relationship with us, you must obtain the consent from your parent or legal guardian prior to contacting us or providing us with your Personal Data.

## 9. Personal Data of Third Person

If you provide any Personal Data of third person (such as guarantor, top level management, authorized person, assignee. Director, shareholder, personnel, employee, founder of a trust, trustee, agent, person in line of control, owner, co-owner, other persons who is not our customers, or other persons related to you according to your relationship with us), including name, surname, address, telephone contact for emergency, debt collection, and family members' income, please inform such third person of this Privacy Notice and obtain his/her consent if necessary or as permitted under the applicable laws.

## 10. How and how long DAOL Financial Group (Thailand) retain your Personal Data

We will retain your Personal Data for the period as reasonably necessary to fulfill the purposes for which we have obtained your Personal Data as set out in this Privacy Notice, and to act in compliance with the applicable rules and laws. However, we may retain your Personal Data if it is necessary for your to exercise any legal defenses, claims, or rights. After such period and your is no longer necessary for the purposes as specified above, we will delete, destroy, or anonymize your Personal Data according to the standards issued by the Personal Data Protection Committee or any laws or international standard.

However, in some cases your Personal Data e.g. name, surname, address, date of birth, the start and end date of your relationship with us, may be stored as our archive database and will not be used or disclosed to other persons for any purpose.

## 11. Changes to this Privacy Notice

We may need to amend or revise this Privacy Notice from time to time. In case of any changes made to our Personal Data protection procedures according to any reasons, such as change in technology and change in laws. We recommend that you read this Privacy Notice and/or the amended one thoroughly and carefully and look for the possible change at <u>www.daol.co.th</u>. However, in case of a significant change which might affect your right as a data owner, we will notify you or ask for your consent appropriately before such change becomes effective.

## 12. Our contact details

If you have any queries regarding our procedures and our activities in relation to your Personal Data under this Privacy Policy, please contact us or our Data Protection Officer at:

## (a) DAOL Securities (Thailand) Public Company Limited

#### Customer Contact Center

At 87/2 CRC Tower, All Seasons Place,9<sup>th</sup>, 18<sup>th</sup>, 39<sup>th</sup>, and 52<sup>nd</sup> Floor, Wireless Road, Lumpini, Pathum Wan, Bangkok 10330, Tel. 02-351-1800 or E-mail: <u>contactcenter@daol.co.th</u>

## (b) Data Protection Officer

At 87/2 CRC Tower, All Seasons Place,9<sup>th</sup>, 18<sup>th</sup>, 39<sup>th</sup>, and 52<sup>nd</sup> Floor, Wireless Road, Lumpini, Pathum Wan, Bangkok 10330, E-mail: <u>dpo@daol.co.th</u>

#### DAOL (THAILAND) PUBLIC COMPANY LIMITED บริษัท ดาโอ (ประเทศไทย) จำกัด (มหาชน)

87/2 CRC Tower, 52nd Floor, All Seasons Place, Wireless Road, Lumpini, Pathumwan, Bangkok 10330 TAX ID 0107562000467 เลขที่ 87/2 อาคารซีอาร์ซีกาวเวอร์ ชั้นที่ 52 ออลซีซั่นส์เพลส ถนนวิทยุ แขวงลุมพินี เขตปทุมวัน กรุงเทพมหานคร 10330 เลขประจำติวผู้เสียกาษีอากร 0107562000467