

Privacy Notice

KTBST Holding Public Company Limited, KTBST Securities Public Company Limited, WE Asset Management Company Limited, KTBST REIT Management Company Limited, and KTBST Lend Company Limited (collectively referred to as “KTBST Group”, “we”, “us” or “our”), including any fund under our management or establishment, 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, to describe our grounds for and means of collection, use, disclosure, and/or cross-border transfer of your personal data when using our services or products through any channel. We recommend that you read and understand this Privacy Notice, of which details are as follows:

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 various channels, including our branches, websites, applications, call centers, activity and exhibition, online contact channels, 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 (1) our individual customers including prospective customers (potential customers), current customers and former customers and individual persons related to such individual customers; (2) employees, personnel, staffs, representatives, shareholders, authorized persons, directors, contact persons, agent and other individual persons related to our corporate customers and individual 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 our other online channels.

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

1. Personal Data that 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 staff, call center or other service channels) or indirectly from other sources (e.g. any company in the KTBST Group, public sources, external service providers, advisors, business partners, agencies, organizations, or any person having a contractual relationship with us, such as third-party custodians, sub-custodians, 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 to disclose 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 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, disclosed in connection with the relationship with us such as information provided to us in the agreements, forms, surveys, questionnaires, information collected from your participation in our business activities, marketing, seminars, and social events; 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, agent, other individual persons related to you that we collect, use, disclose and/or transfer to other countries, including 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 from your participation in our business activities, marketing, seminars, and social events; 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 other countries, includes but is not limited to the following:

- (a) fingerprint, facial recognition, and/or iris recognition for the purpose of proofing and authentication 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 the 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 law and regulation.

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.

2. KTBST Group 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, and other services.	<ul style="list-style-type: none"> ■ Where necessary to fulfil contractual obligations between you and us. (Contractual Basis) ■ It is in our legitimate interest to render appropriate services or products to you. (Legitimate Interest)
Offering services and products of each company in KTBST Group or our business partners which 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.	<ul style="list-style-type: none"> ■ It is in our legitimate interest (Legitimate Interest)

Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing
Offering service and/or products of each company in KTBST Group or our business partners which are not similar or not related to the services and/or products you have with us.	<ul style="list-style-type: none"> ■ 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 style="list-style-type: none"> ■ Where your consent is given to us (Consent)
Communicating with you e.g., sending email, letter or any document to you as prescribed in the agreement or by laws.	<ul style="list-style-type: none"> ■ Where necessary to fulfil contractual obligations between you and us. (Contractual Basis) ■ Where necessary as required by applicable laws (Legal Obligation) ■
Conducting Know Your Customer and/or Customer Due Diligence for accurate and up-to-date information.	<ul style="list-style-type: none"> ■ Where necessary as required by applicable laws (Legal Obligation)
Preventing and detecting suspicious transactions that could lead to illegal activities such as money laundering, terrorism, or public fraud.	<ul style="list-style-type: none"> ■ Where necessary as required by applicable laws (Legal Obligation)
Reporting your Personal Data to government agencies which are our regulators or when receiving a summon or suspension from government agency or court.	<ul style="list-style-type: none"> ■ Where necessary as required by applicable laws (Legal Obligation)
Preventing, dealing with and mitigating risk which may arise from illegal activities, including sharing your Personal Data to elevate our operational standard to prevent, deal with and mitigate risks.	<ul style="list-style-type: none"> ■ Where necessary as required by applicable laws (Legal Obligation) ■ It is in our legitimate interest (Legitimate Interest) ■
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 style="list-style-type: none"> ■ Where necessary to fulfil contractual obligations between you and us. (Contractual Basis) ■ It is in our legitimate interest (Legitimate Interest) ■ Where necessary as required by applicable laws for the substantial public interest (Substantial Public Interest) ■
Analyzing risk based on your behavior, including Credit Scoring Test or Suitability Test.	<ul style="list-style-type: none"> ■ Where necessary to fulfil contractual obligations between you and us. (Contractual Basis) ■ Where necessary as required by applicable laws (Legal Obligation)

Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing
	<ul style="list-style-type: none"> ■ Where your consent is given to us for the collection of your Personal Data via various channel, including your electronic devices, for the aforementioned purpose. (Consent)
<p>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.</p>	<ul style="list-style-type: none"> ■ Where necessary to fulfil contractual obligations between you and us. (Contractual Basis)
<p>Maintaining relationship with customers, such as complaint management, satisfactory surveys or offering of special benefits to customers without marketing purposes.</p>	<ul style="list-style-type: none"> ■ It is in our legitimate interest (Legitimate Interest)
<p>Processing data and statically analyzing data, of which the result will not be identifiable to you.</p>	<ul style="list-style-type: none"> ■ It is in our legitimate interest (Legitimate Interest)
<p>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)</p>	<ul style="list-style-type: none"> ■ Where your consent is given to us (Consent)
<p>CCTV recording of visitors when entering our premises, including branches.</p>	<ul style="list-style-type: none"> ■ It is in our legitimate interest (Legitimate Interest)
<p>Interviewing for the use in publishing and electronic media via various channels, such as our websites, social network, internal email for public relations and advertisements.</p>	<ul style="list-style-type: none"> ■ Where your consent is given to us (Consent)

Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful basis for data processing
Using your fingerprint, facial recognition or iris recognition for verification and authentication of your identity and transactions using the digital identity verification and authentication services.	<ul style="list-style-type: none"> ■ Where your consent is given to us (Consent) ■ Where necessary as required by applicable laws (Legal Obligation)
Collecting and using your Sensitive Data such as religion, blood type only as shown on the copy of Identification Card.	<ul style="list-style-type: none"> ■ Where necessary for the establishment of legal claims, the compliance to the applicable laws or the defense of legal claims
Collecting information on your disability, health and/or physical disorder to offer the services suitable for you and to analyze your risk level.	<ul style="list-style-type: none"> ■ Where necessary as required by applicable laws (Legal Obligation) ■ Where your consent is given to us (Consent)
Managing risk, supervising, managing internal operation, and transferring data amongst KTBST Group, to which the appropriate safety measures will be applied, for the purposes as specified in the Agreements mutually agreed by the companies in KTBST Group.	<ul style="list-style-type: none"> ■ It is in our legitimate interest (Legitimate Interest) ■ Where necessary to fulfil contractual obligations between you and us. (Contractual Basis) ■ Where necessary as required by applicable laws (Legal Obligation)
Using and disclosing of your Personal Data for the purposes of transfer or sell the business, assets or shares of any KTBST 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.	<ul style="list-style-type: none"> ■ It is in our legitimate interest (Legitimate Interest)

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 KTBST Group's and your compliance to the applicable laws.

3. People who will share your Personal Data

Upon your explicit consent, or as necessary for the performance of contractual obligations, or as required by laws, or for our legitimate interests 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 law and will procure sufficient personal data protection standards.

- (a) KTBST Group include KTBST Holding Public Company Limited, KTBST Securities Public Company Limited, WE Asset Management Company Limited, KTBST REIT Management Company Limited, and KTBST Lend Company Limited.
- (b) Our business partners, whom 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, include: 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, and law firms.
- (d) Financial institutions and payment service providers such as banks that provide payment services 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 include 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 the event that the occurrence of any event specified above; the recipients shall comply with this Privacy Notice.
- (h) Government agencies regulating the KTBST Group or registration authorities include Bank of Thailand, Securities and Exchange Commission, Stock Exchange of Thailand, securities depository, Thailand Clearing House, Office of Insurance Commission, 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. Data Subject 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

You may have the right to request us to delete or destroy or anonymize your personal data in case of the following events:

- (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

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 KTBST Group customer service at E-mail: customerservice@ktbst.co.th or Tel: 02-351-1800 and submit the form to E-mail: dpo@ktbst.co.th 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 we protect your Personal Data

We maintain technical, physical, and administrative security measures designed to provide an optimal protection of your Personal Data from 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 KTBST 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.

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

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 we 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 for the longer period as required by the applicable laws.

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 www.ktbst.co.th. 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) KTSBT Securities Public Company Limited

Customer Service

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

(b) Data Protection Officer

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