



## MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

### Personal Data Protection Policy

Muangthai Capital Public Company Limited and its subsidiaries (the “Company”) are aware of the importance of personal data protection issues. This policy explains how the Company treats the personal data of data owners such as collection, storage, use, disclosure, including various rights of data owners so that data owners are aware of the Company's personal data protection policy. The Company would like to announce the policy regarding the Personal Data Protection Act 2019 as follows:

#### 1. Respecting the Privacy Rights of Service Users

The Company respects and gives importance to the rights, personal data and protection of personal data of the owner of personal data. The Company realizes that owners of personal data would like to receive security in the Company's attention of their personal data.

#### 2. Definitions

- **Personal data** means information about a natural person that makes it possible to identify that person, directly or indirectly, but does not include information about a specific deceased person.
- **Sensitive personal data** means personal data as defined in Section 26 of the Personal Data Protection Act 2019. This includes information on race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health information, disabilities, trade union information, genetic information, and biological information or any other information which affects the owner of personal data in the same manner as announced by the Personal Data Protection Board.
- **Personal data processing** means any operations with personal data, such as collecting, recording, copying, organizing, preserving, updating, changing, using, retrieving, disclosing, forwarding, publishing, transferring, combining, deleting, destroying, etc.
- **Personal data subject** means the natural person who owns the personal data that DGA collects, uses or discloses.
- **Personal data controller** means a person or juristic person who has the authority and responsibility to make decisions regarding the collection, use, or disclosure of personal data.
- **Personal data processor** means a person or legal entity that collects, uses, or discloses personal data according to the order or on behalf of the personal data controller. However, the person or juristic person who performs such operations is not the controller of personal data.



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### 3. Laws for Collecting Personal Data

The Company will collect personal data of data subjects under the following personal data processing bases stipulated by law:

1. To prevent or stop danger to a person's life, body, or health.
2. To comply with the contract
3. To carry out missions for the public benefit
4. To legitimate interest
5. To perform duties according to law
6. To obtain the consent of the data owner
7. To prepare historical documents Important research or statistics

### 4. Source of Personal Data

1. The Company will collect information that the data owner has provided to the Company or that is available to the Company from applying to use the Company's products or services, information on participation in various activities on the Company's online media, or information on use through the website including information obtained from the data owner's contact with the Company.
2. The Company may collect the data owner's personal data with the data owner's personal data obtained from other sources only in the case of necessity and with the consent of the data owner for the benefit of updating the personal data of the data owner and to improve the quality and efficiency of the Company's services.

### 5. Collected Personal Data

1. Personal data such as name, title, date of birth, age, national identification card number, occupational information, place of work, salary information, signature and political status.
2. Contact information such as address, telephone number, email, Line ID, land title deed number and location map of the accommodation.
3. Information about transactions, finances and salary information
4. Other information that the data owner consents to provide to the Company, such as suggestions and information about vehicles.

However, the Company will not store sensitive personal data of the data owner such as genetic characteristics, sexual behavior or information that may harm or damage one's reputation or may cause feelings of unfair discrimination or inequality to any person unless the Company has collected such information under the personal data processing base required by law as mentioned above.



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### 6. Purposes for Collecting, Using and Disclosing Personal Data

The Company will collect personal information through lawful and fair methods for the benefit of the owner of the personal information in using the product or service as well as to comply with any laws that the Company or the owner of personal data must comply with and for any other purposes as specified in this policy as follows:

1. The owner of personal data can use the Company's products or services according to the wishes for which the owner of personal data has entered into a contract with the Company or to carry out the request of the owner of personal data before using the Company's products or services, such as:

- 1.1 Consideration and approval of the provision of various products or services such as applying for loans, insurance, payments, or property.

- 1.2 Actions related to the use of products or services such as processing, contacting, notifying, making complaints, entrusting work to others who are external service providers, transferring rights or duties, notification of debt payment or product or service renewal, debt collection.

In cases where the Company is necessary to collect, use, or disclose personal data of the owner of personal data for the performance of a contract, performance of legal duties, or for the necessity of entering into a contract if the personal data owner refuses to provide personal data or objects to the processing for the activity's purpose, it may result in the Company being unable to process or provide services as requested by the personal data owner, in whole or in part.

2. To perform duties in accordance with relevant or applicable laws, such as

- 2.1 Compliance with orders of legal authorities

- 2.2 Compliance with laws under the supervision of the Bank of Thailand, securities and exchange laws, general insurance laws, tax laws, anti-money laundering laws, laws for preventing and suppressing the financing of terrorism and the proliferation of weapons of mass destruction, bankruptcy laws and other laws that companies are required to comply with both in Thailand and abroad, including announcements and regulations according to law.

3. To carry out necessary operations under the legitimate interests of the Company or of other persons or juristic persons without exceeding the extent that the owner of personal data can reasonably expect (Legitimate Interest) such as

- 3.1 Voice recording via Call Center, CCTV recording, and card exchange before entering the building.

- 3.2 Maintaining relationships with personal data owners such as handling complaints, evaluating satisfaction, taking care of personal data owners by Company employees, and notifying or offering products or services of the same type that

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the owner of personal data has with the Company, which is beneficial to the owner of personal data

- 3.3 Risk management, supervision, and internal management, including forwarding to affiliates of the same business for such purposes under the Company's personal data protection policy.
  - 3.4 Personal information must be made so that it cannot be personally identified.
  - 3.5 Preventing, dealing with, reducing the risk that corruption may occur, defaulting on debt payments or breaching contracts, breaking various laws including disclosing personal information to raise the standards of work in affiliates of the same business in preventing, dealing with, and reducing risks.
  - 3.6 Collection, use, or disclosure of personal information of directors, persons authorized to act on behalf of juristic person customers.
  - 3.7 Sending parcels or letters to the owner of personal data
4. To receive benefits from the use of products or services as the owner of personal data has chosen to give consent, such as
    - 4.1 To allow the owner of personal data to receive products or services that are good and consistent with the needs of the owner of personal data.
    - 4.2 To allow personal data owners to receive offers, special benefits, advice and news, including the right to participate in special activities.
- Whether it is products or services, benefits, news, or special activities of the Company or business partners or third parties related to the Company as the owner of personal data has given consent.
5. To improve and develop the quality of products and services to date.
  6. To comply with applicable laws, announcements, orders or proceedings regarding lawsuits, processing information according to court subpoenas, including exercising your rights regarding information.
  7. To prepare historical documents for public use, research, or prepare important statistics that the Company has been assigned to carry out.

### **7. Use of Personal Information**

1. The Company will use and disclose the personal information of the data owner only with the express consent of the data owner and in writing or electronically, unless consent cannot be obtained by such means. It must follow the Company's objectives only.
2. The Company will manage its employees not to disclose, display, or make available in any other manner the personal information of the data owner other than the intended purpose or to third parties unless:
  - 2.1 It is a case specified by law.

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- 2.2 It requires the consent of the data owner.
- 2.3 It is for the benefit of the life, health, or safety of the data owner.
- 2.4 It is for the benefit of the investigation of the investigating officer according to the Criminal Procedure Code or the court's adjudication.
- 2.5 It is for the benefit of study, research or the preparation of important statistics.
3. In some cases, the Company may allow other persons or agencies to access or use the personal information of the data owner as necessary and to meet the Company's objectives and authority. The Company must obtain consent from the data owner first.

### 8. Cookie Policy

The Company's website uses cookies to facilitate a more complete and efficient user experience. Cookies are text files that are stored on a user's hard drive by a web page server. Cookies cannot be used to launch programs or deliver viruses to a computer and can only be read by the web server of the domain that sent the cookie to the user.

The Company may use cookies to collect, store and track information for statistical purposes in order to improve the website and services. Users can choose whether to accept or reject cookies. Users can modify their browser settings to refuse the use of cookies. The Company uses the following types of cookies:

1. **Strictly Necessary Cookies:** We provide the best possible experience when users access and navigate our website and use its features, for example, these cookies inform the Company that a user has created an account and has logged into that account to access the content.
2. **Website operation cookies:** The Company can operate the Website and its services according to the user's choices, for example, the Company remembers user names and how users customize the Website and Services for future visits.
3. **Analytical/Performance Cookies:** The Company and its third-party services may collect information for statistical purposes about how the Company's visitors use the Website. These cookies will not contain personal information such as names and email addresses and will be used to help the Company improve your experience on the Company's website.
4. **Social Media Cookies:** Third-party cookies from social media sites such as Facebook, Twitter, and others to help the Company track social media users when they visit the Company's website by social media tagging tools.

### 9. Data Disclosers and Third-Party Service Providers or Contractors

The Company may disclose personal information to third parties, including affiliated companies in the same business, personal data processors, business partners, third parties who provide services



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or related persons. It also covers executives, employees, contractors, agents, consultants of the Company and of persons or agencies who receive such information.

The Company may disclose personal information to persons required by law such as government agencies or authorities where the Company must disclose information for legal operations or important purposes, various committees related to the Company's legal operations, and regulatory agencies. It includes requests to disclose information by virtue of law, such as requests for information in connection with litigation or legal proceedings, or requests from private agencies or other third parties in connection with legal proceedings.

In the case of disclosing personal information to another person for the recipient's marketing purposes such as sales promotion, public relations, or offering products or services from the recipient of the information to the owner of the personal information, the Company will inform the name of the recipient of the information to the owner of the personal information to decide on giving consent.

### 10. International Data Transfer

The Company may need to send or transfer personal information to affiliates of the same entity/business located overseas or other recipients as part of the Company's normal business operations such as transferring personal information to servers or clouds in different countries.

In the event that the destination country has insufficient standards, the Company will oversee the transfer of personal data in accordance with the law and will provide appropriate personal data protection measures in line with confidentiality standards. such as confidentiality agreements with recipients of information in those countries In the case that the recipient of the information is a subsidiary of the same business, the Company may choose to use the following methods: The personal data protection policy has been inspected and certified by the relevant legal authority and to be ensured that the transfer of personal data to foreign affiliates must be in accordance with the personal data protection policy instead of what the law specified.

### 11. Data Storage Period

The Company will retain personal information for as long as reasonably necessary to achieve the purposes specified in this Personal Data Protection Policy. If legal action is taken, personal data may be retained until the action is concluded. It includes a possible time period for filing an appeal or appeal. Thereafter, personal data will be deleted or archived as permitted by applicable law.

### 12. Security

1. The Company recognizes the importance of maintaining the security of the data owner's personal information. Therefore, the Company determines measures to maintain the security of personal information appropriately and in accordance with the confidentiality of personal information to prevent loss, access, destruction, use, conversion, modification or disclosure

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of personal information without right or unlawfully. It must be as specified in the Company's information technology security policies and practices.

2. The Company must appoint a personal data protection officer who is responsible for giving advice on operations, inspecting operations for correctness, coordinating when there are problems, and maintaining the confidentiality of personal information from their duties.
3. If there is a personal data breach, the Company will notify the Personal Data Protection Office within 72 hours from the time of knowledge. If the violation poses a high risk to the rights and freedoms of the personal data owner, the Company will notify the personal data owner of the violation along with a prompt remedy.

### 13. Rights of the Personal Data Owner

1. Right to withdraw consent: The owner of personal data has the right to withdraw consent previously given to data processing. However, revoking such consent will not affect the collection, use, or disclosure of personal data that the owner of personal data has previously given consent to legally.
2. Right to object: The owner of personal data has the right to object to processing by referring to a legal basis other than consent.
3. Right to be informed: The owner of personal data has the right to be informed of his or her data that is processed by the Company from disclosures related to data processing and to request the Company to make a copy of such data to the owner of personal data.
4. Right to rectification: The owner of personal data has the right to confirm the accuracy and correct personal data for accuracy and currentness.
5. Right to restriction of processing: The owner of personal data has the right to suspend the processing of personal data. In such cases, the Company will not process the data of the personal data subject other than simply storing the data.
6. Right to erasure/right to be forgotten: The owner of personal data has the right to request the Company to delete the owner's personal data from the Company's storage.
7. Right to data portability: The owner of personal data has the right to read or use it with work tools or devices and request the Company to transfer personal data to another data controller. This right can be achieved if personal data is processed in an automated way and is processed based on consent and a contract to which the data subject is a party or before entering into a contract.
8. Right to complain: The owner of personal data has the right to complain to the relevant legal authority if the owner of personal data believes that the collection, use, or disclosure of personal data is done in a manner that violates or does not comply with the principles of law.

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### 14. Changes to Privacy Policy

The Company may update this privacy policy from time to time to reflect changes in service provision, Company operations and suggestions and opinions from data owners. The Company will clearly announce the change before implementing the change or may send a notification directly to the data owner.

### 15. Contact or Exercise of Rights

- **Call Center:** +662-4838888 or 1455

Location: Muangthai Capital Public Company Limited, No. 332/1 Charansanitwong Road, Bangplad, Bangplad, Bangkok 10700

- **Data Protection Officer (DPO)**

E-mail: [dpo@muangthaicap.com](mailto:dpo@muangthaicap.com)

Location: Muangthai Capital Public Company Limited, No. 332/1 Charansanitwong Road, Banplad, Bangplad, Bangkok 10700