

Privacy Notice

For Prospective Customers, Existing Customers, and Related Persons

1. Purpose and Scope

Srisawad Capital 1969 Public Company Limited (the "Company") is committed to performing its duties in accordance with the Personal Data Protection Act B.E. 2562 (2019) ("PDPA"). This Privacy Notice outlines the Company's practices regarding the protection of your personal data (as defined below). It explains the purposes and methods by which the Company collects, uses, discloses, cross-border transfers, and/or otherwise processes (collectively, "processes" or "processing") your personal data. Furthermore, it describes your legal rights regarding your personal data, including data protection rights.

This Privacy Notice governs the processing of personal data of prospective customers, existing customers, and related persons. All affected parties should thoroughly read, understand, and regularly review this Privacy Notice to remain fully informed about how their personal data is processed.

In this Privacy Notice, the following terms shall have the meanings ascribed below:

"Personal Data" means any information relating to a living individual that enables the identification of such person, whether directly or indirectly.

"Sensitive Personal Data" means any personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union membership, genetic data, biometric data, or any other data that may affect the data subject in a similar manner as prescribed by law.

This Privacy Notice applies to individuals who are customers of the Company, including prospective customers, existing customers, and related persons. Related persons include vehicle users, beneficiaries, witnesses, guarantors, spouses of customers or of persons providing consent, auction winners, referees, contact persons for inquiries or debt collection, and any individuals contacting the Company. Throughout this Privacy Notice, these individuals are collectively referred to as "You" or "your".

If you have any questions or suggestions regarding the Company's personal data protection practices, or if you wish to exercise your rights under the PDPA, you may contact the Company through the following channels:

Srisawad Capital 1969 Public Company Limited

99/392 Srisawad Building, 1,5,6 Floor, Soi Chaeng Watthana 10, Yak 3 (Benjamit), Thung Song Hong
Subdistrict, Lak Si District, Bangkok.

Email: info@srisawadcapital.co.th Tel: 0-2691-5600

Data Protection Officer (DPO) Email: dpo@srisawadcapital.co.th

2. Persons Authorized to Process Your Personal Data

As the Company has the role and duty to determine the purposes and means of processing your personal data in accordance with the PDPA, the Company acts as the Data Controller of your personal data.

3. Personal Data Collected General Personal Data

Case of Prospective Customers

The Company collects personal data of prospective customers, including but not limited to the following categories of data:

- a) **Identification Data:** Such as name, surname, and national identification number.
- b) **Background Data:** Such as nationality.
- c) **Contact Data:** Such as telephone number, email address, and physical address.
- d) **Employment Data:** Such as occupation, income, and duration of employment.
- e) **Other Data:** Such as the specific type of loan of interest.

Case of Existing Customers and Related Persons

(Including vehicle users, beneficiaries, witnesses, guarantors, spouses of customers or of persons providing consent, auction winners, referees, contact persons for inquiries or debt collection, and any individuals contacting the Company.)

The Company collects personal data of existing customers and related persons, including but not limited to the following categories of data:

- a) **Identification Data:** Such as name, surname, nickname, national identification number, expiration date, copy of national identification card, signature, and photograph.
- b) **Background Data:** Such as date of birth, age, gender, height, weight, nationality, marital status, and relationship with the customer.

- c) **Contact Data:** Such as telephone number, email address, physical address, copy of house registration and home map.
- d) **Financial Data:** Such as source of income, credit limit, credit or debit card number, and refund amount.
- e) **Asset Identification Data:** Such as motorcycle details, vehicle registration book, photos of residence, and photos of motorcycle.
- f) **Employment Data:** Such as workplace, occupation, position, and income.
- g) **Other Data:** Such as hire-purchase details, application number, contract number, contract date, contract status, auction price, payment and debt collection details, receipt number, insurance details, policy number, insurance certificate number, duration of residence at the address, and voice recordings of conversations

Sensitive Personal Data

In addition to the Personal Data specified above, the Company may process Sensitive Personal Data of existing customers and related persons (including vehicle users, beneficiaries, witnesses, guarantors, spouses of customers or of persons providing consent, auction winners, referees, contact persons for inquiries or debt collection, and any individuals contacting the Company) as follows:

- a) **Disability Status**
- b) **Health Data**
- c) **Religious Data**

4. Methods of Personal Data Collection

Generally, the Company collects Personal Data directly including prospective customers, existing customers, and related persons (such as vehicle users, beneficiaries, witnesses, guarantors, spouses of customers or of persons providing consent, auction winners, referees, contact persons for inquiries or debt collection, and any individuals contacting the Company). However, in certain circumstances, the Company may also collect your Personal Data indirectly from third-party sources.

5. Purposes of Processing Personal Data

Case of Prospective Customers

The Company processes the Personal Data of prospective customers to execute various operations aligned with the scope and purposes of its business activities, including but not limited to:

- a) Contacting
- b) Marketing

Case of Existing Customers and Related Persons:

(Including vehicle users, beneficiaries, witnesses, guarantors, spouses of customers or of persons providing consent, auction winners, referees, contact persons for inquiries or debt collection, and any individuals contacting the Company.)

The Company processes the Personal Data of existing customers and related persons to execute various operations aligned with the scope and purposes of its business activities, including but not limited to:

- a) Credit risk analysis.
- b) Consideration of loan approval and contacting relevant parties to verify information for loan approval consideration.
- c) Debt collection and asset tracking.
- d) Approval of refunds.
- e) Seizure of collateral and report preparation.
- f) Auction of seized collateral.
- g) Operations related to vehicle registration books, such as account closing, mandatory vehicle insurance (Por Ror Bor) renewal, vehicle tax renewal, ownership transfer, notice of vehicle suspension, and preparation of vehicle auction documents.
- h) Data storage and backup in the database.
- i) Receiving inquiries via the Call Center, email, and the website.
- j) Preparation of financial documents, such as issuing receipts for excess payment verification, accounts receivable accounting, accounts payable accounting, and refunds.
- k) Storage of data on the website.

The Company relies on the following legal bases and special conditions to process your personal data. Note that the legal bases and special conditions specified below do not apply to all of your personal data processing. The processing of personal data may rely on one or a combination of several legal bases.

1. **Contractual Basis:** The Company has a duty to process your personal data for the performance of duties under the hire-purchase contract. The personal data required for processing under this basis is

mostly the data appearing in Section 3. In the event that you do not provide your personal data to the Company for the specified purposes, the Company may not be able to contact you or enter into a contract with you.

2. **Legitimate Interest Basis:** In some cases, the Company needs to use your personal data for the legitimate interests of the Company or of third parties. Such legitimate interests must not override your fundamental interests, rights, and freedoms.
3. **Consent Basis:** In some cases, the Company needs to obtain explicit consent from prospective customers, existing customers, and related persons to process their personal data for communication purposes, including marketing.
4. **Legal Obligation Basis:** The Company has a duty to process your personal data in accordance with legal obligations, court orders, or any judgments related to the Company's operations. In the event that you do not provide your personal data to the Company for the specified purposes, there may be legal consequences as prescribed by relevant laws.
5. **Compliance with the Law to Achieve Public Interest Purposes:** The Company needs to comply with the law to achieve important public interest purposes regarding the collection of disability data of customers who wish to apply for accident insurance.

6. To Whom Does the Company Disclose or Transfer Your Personal Data?

The Company may find it necessary to disclose or transfer your personal data to third parties for the purpose of processing your personal data. Such persons may include the following:

- a) Companies within the business group: Srisawad Corporation Public Company Limited, Srisawad Power 2014 Company Limited, Fast Money Company Limited, S Leasing Company Limited, Cathay Leasing Company Limited and any other affiliated companies.
- b) Cloud service providers.
- c) Outsourced agencies performing debt collection.
- d) Outsourced service providers dealing with vehicle registration books.
- e) Car auction companies and the National Credit Bureau.
- f) Insurance brokers and insurance companies.
- g) Relevant government agencies.
- h) Auditing firms.

- i) Companies performing document storage.
- j) Business partners of the Srisawad Group, including relevant third parties: Chubb Samaggi Insurance Public Company Limited, Generali Insurance (Thailand) Public Company Limited and Thai Paiboon Insurance Public Company Limited.

7. International Transfer of Personal Data

For the purposes specified in this Privacy Notice, the Company may disclose or transfer your personal data to third parties or servers located in foreign countries, which may or may not have personal data protection standards equivalent to those of Thailand. Furthermore, the Company has implemented measures ensuring that your personal data is transferred securely, that the recipients apply appropriate personal data protection standards, and that such transfers of personal data comply with the PDPA.

8. Security Measures for Personal Data Protection

The Company has established technical and administrative measures to prevent the loss, misuse, and unauthorized access, disclosure, or alteration of your personal data. Third parties must also process your personal data in accordance with the Company's security policy.

9. Retention Period of Your Personal Data

The Company will retain your personal data for as long as reasonably necessary to fulfill the scope and purposes specified in this Privacy Notice, and to establish, exercise, or defend legal claims. However, the Company may be required to retain your personal data for a longer period if required by any applicable laws.

10. Your Rights Regarding Personal Data : Subject to the provisions and exceptions of applicable laws, your rights regarding your personal data are as follows:

- a) **Right to Withdraw Consent:** In cases where you have provided explicit consent, you have the right to withdraw such explicit consent at any time by sending a notice of consent withdrawal to the Company.
- b) **Right to Access Personal Data:** You have the right to request access to and a copy of all your personal data that the Company is processing.
- c) **Right to Data Portability:** In cases where the Company maintains a platform that allows you to access your personal data by automated means:

- 1. You have the right to request that the Company transfer your personal data to another organization by automated means.

2. You have the right to request that the Company transfer your personal data directly to another organization, except where restricted by technical limitations.

d) Right to Object to Personal Data Processing: You have the right to object to the processing activities of your personal data in certain circumstances.

e) Right to Request Erasure of Personal Data: You have the right to request that the Company delete your personal data that the Company is processing, or to render such data anonymously, in the following cases:

1. In cases where your personal data is no longer necessary for the purposes of processing.
2. In cases where you have withdrawn your explicit consent for the Company to process your personal data.
3. In cases where you object to the processing of your personal data which the Company has performed based on legitimate interests, and the Company has no overriding legitimate grounds for processing the personal data.
4. In cases where the personal data processing activity is not in accordance with the law.

f) Right to Request Suspension of Personal Data Processing: You have the right to request that the Company restrict the processing of your personal data in the following cases:

1. In cases where the Company is verifying your request to exercise your right to rectify your personal data.
2. In cases concerning personal data that you have previously requested the Company to delete, but you have subsequently requested the Company to restrict the processing of your personal data instead.
3. In cases where the personal data retention period has ended, but you have requested the Company to restrict the processing of your personal data for legal reasons.
4. In cases where the personal data is undergoing verification regarding an objection to the processing of personal data.

g) Right to Request Rectification of Personal Data: You have the right to correct your personal data so that it is accurate, up-to-date, complete, and not misleading.

Please be informed that the exercise of your rights as specified above is subject to various relevant factors, and the Company may not be able to comply with your request if the Company can rely on a legal basis to continue processing your personal data. In the event that you wish to exercise your rights regarding the protection of

your personal data, you may contact the Company through the channels specified above, and the Company will process your request rigorously and promptly.

11. Amendments to the Privacy Notice

The Company may amend this Privacy Notice as deemed appropriate to improve the efficiency of processing your personal data. The Company will notify you if such amendments significantly affect the processing of your personal data or if the Company is required to do so by law