



(Translation)

Privacy Notice

Bangkok Commercial Asset Management Public Company Limited (“the Company”) recognizes the importance of personal data protection of the personal data subject (“you” and “your”) and has thus prepared and publicized this Privacy Notice (“Notice”) to give clarification of the compilation, use or disclosure of your personal data, as you are the Company’s existing debtor/customer, prospective debtor/customer, current and prospective supplier, and other data owners who contact or relate to the transactions with the Company, as well as personal data protection methods and guidelines for appropriate management of such data pursuant to the Personal Data Protection Act B.E. 2562 (2019).

The Company is the personal data controller who is responsible for the personal data compiled and processed. This Notice contains the following topics: collected personal data and processing methods, purposes of personal data use, personal data disclosure methods, data storage methods and storage period, applicable security measures, and rights of personal data subject and exercising of such rights. The Company may provide you with additional information when you apply for the use of certain products or services or contact the Company specifically on a case-by-case basis.

1. Definition

“**the Company**” means Bangkok Commercial Asset Management Public Company Limited.

“**Act**” means Personal Data Protection Act B.E. 2562 (2019) and its amendments.

“**Personal data**” has the definition as prescribed in the Act, i.e. any information relating to a natural living person, which can enable the identification of such person, whether directly or indirectly.

“**Data subject**” means a natural living person who is identified or identifiable by processing of your personal data.

2. Personal Data Subject to which this Notice is Applicable

2.1 Existing debtors/customers, prospective debtors/customers and current/prospective suppliers, as well as those who used to utilize the products or services, persons who enquire about the products or services, persons who are informed of the products or services, and those who are offered or invited by the Company to use or obtain

its products or services, and natural persons who are related to the juristic person debtors/customers of the Company or juristic persons which have transactions with the Company, such as shareholders, directors, authorized persons, partners, representatives, employees, officers and/or assigned persons, etc.

2.2 Other persons who are data subjects who contact or relate to the Company's transactions, such as visitors, contract employees, employees, officers, personnel, family members, friends, neighbors, persons referred to or recommended by the Company's debtors or customers, investors, guarantors, mortgagers, collateral providers, ultimate beneficiaries, any other persons whose personal data may be accessible by the Company from customers' transactions (e.g. asset price appraisal or debt restructuring, etc.), and persons who visit the Company's website or application or social media account or use services at its headquarters or branch offices, professional consultants, and other natural persons with similar characteristics

3. Purposes and Legal Bases for Processing Personal Data

The Company compiles, uses or discloses your personal data so far as necessary under lawful basis for processing personal data of the Company. This includes compilation, use or disclosure of personal data according to contractual agreements in which you are a counterparty ("Contract"), legal obligations required by law ("Legal obligation"), legitimate interests ("Legitimate interests"), taking actions under your consent ("Consent"), and/or taking actions under other legal bases for the activities in which personal data is processed as tabulated below and activities other than those aforementioned, which necessitates the Company's compilation, use or disclosure of personal data on legal bases:

No.	Activity groups	Activities with personal data processing	Legal bases
Customers, debtors and external parties			
1	Data of debtors from financial institutions which sell assets	Receipt of debtors' data from financial institutions which sell NPLs	- Contract
2	Examination of debtors' qualifications as prescribed by laws	Examination of personal data against the Company's database to consider qualifications and prohibited characteristics to support approval of entering into agreements or contracts, such as examination of designated persons to undergo KYC/ CDD check, etc.	- Legal obligation
3	Examination of information and evaluation of debtors	Submission of request for evaluation of debtor credit limits, information check before debt	- Contract

No.	Activity groups	Activities with personal data processing	Legal bases
		compromise, issue of invitation letter to negotiate, asset survey and due diligence	- Legitimate interests
4	Entering into contracts of debtors and customers	Entering into agreements/contracts or any transactions relating to the agreements/contracts, amendment to contracts or agreements, such as asset acquisition form, debt restructuring application form, reservation for acquisition of assets, etc.	- Contract
5	Application for credit approval	Application for credit approval of debtors and customers to enter into agreements/contracts to acquire or dispose of assets or debt restructuring agreements	- Contract
6	Legal prosecution and legal execution	Litigation, prosecution, auction sale	- Legitimate interests
7	Change of ownership	Correction of land title deed documents, change of ownership	- Legal obligation
8	Marketing survey	Alert on news and information on products or services, questionnaires, filing of petition, marketing survey and data collection	- Consent
9	Debt collection	Debt collection	- Contract
10	Closed-circuit television (CCTV) recording	Keeping the Company's buildings or premises under surveillance, including exchange of identity card before entering the office areas, recording of images of visitors at the Company or its branches with the use of CCTVs	- Legitimate interests
12	Audit supervision and internal organization management	Risk management, audit supervision and internal organization management	- Legitimate interests
13	Engagement of external service providers (Outsourcing)	Disclosure to representatives, contractors/sub-contractors, and service providers for any operation of the Company	- Contract - Legitimate interests

No.	Activity groups	Activities with personal data processing	Legal bases
14	Voice recording of call center system	Voice recording of telephone conversation between of the caller who contacts or enquires information through call center system	- Legitimate interests
15	Computer storage of traffic data	Storage of traffic data via computer system	- Legitimate interests
16	Finance and accounting	The Company's accounting preparation, preparation and delivery of receipts to debtors/customers	- Legitimate interests
Suppliers			
17	Entering into supplier contracts	Consideration and approval of contracts on service or rent of space for entering into contracts between you and the Company	- Contract - Legitimate interests
18	Entering into supplier contracts	Compliance with contracts between you and the Company, compliance with the Company's internal procedures, receipt or delivery of documents between you and the Company	- Contract - Legitimate interests
19	Examination of qualifications as prescribed by laws	Compliance with legal obligations and law execution demand including report to government agencies under the laws, such as Bank of Thailand and Revenue Department, or when receiving order/writ/notice to take any actions by virtue of the laws in relation to such agency	- Legal obligation
20	Entering into supplier contracts	Transfer of rights, duties and any benefits according to the contracts between you and the Company including transfer or sale of debts, transfer resulting from conversion of assets or securities as allowed by law	- Contract - Legitimate interests
21	Maintenance of relationship with suppliers	Maintenance of relationship with suppliers of the Company such as information enquiry, complaint management, offer of privileges without marketing purposes	- Legitimate interests

No.	Activity groups	Activities with personal data processing	Legal bases
22	Entering into supplier contracts	Disclosure to representatives, contractors/sub-contractors and service providers for any operation of the Company	- Contract - Legitimate interests
23	Risk management	Risk management, audit supervision and internal organization management	- Legitimate interests
24	Company Management	Company management such as minutes of meetings; broadcast of pictures and sounds for meetings; picture, video and sound recordings for meetings to be used as evidence of such meetings; advertisements via print and online media; security; organizing of activities; and dissemination of any news and offers for your benefits as well as other necessary actions which take your fundamental rights to your personal data into consideration and are within boundaries where you are able to reasonably expect.	- Legitimate interests

4. Personal Data Protection Principles

The Company integrates key concepts of personal data protection into its operation to ensure that the personnel at all levels apply these principles to their work processes from planning to implementation.

4.1 Lawfulness, fairness and transparency: The Company shall process personal data only as allowed on the lawful basis and clearly set out personal data compilation and utilization methods.

4.2 Purpose limitation: The Company shall process personal data only for the purposes determined and notified when the Company has received such personal data, unless in case of processing for relevant purposes or clearly for performance of duties according to the laws.

4.3 Data minimization: The Company shall compile and use personal data only so far as necessary to achieve the purpose of data processing.

4.4 Accuracy: The Company shall take appropriate actions to ensure that the personal data compiled by the Company is correct, complete and up-to-date.

4.5 Storage limitation: The Company shall not keep personal data for a period longer than necessary for use, except in case it is required to store the data in accordance with the document retention standard or pursuant to government regulatory rules.

4.6 Integrity and confidentiality: The Company shall put in place appropriate technical and managerial measures to ensure that the personal data so compiled is retained under proper level of security and safety.

4.7 Accountability: The Company shall arrange for appropriate recording and measures to ensure that it is accountable to the actions taken in relation to the personal data and demonstrate that it has performed under the personal data protection principles in all respects.

5. Personal Data Collection

5.1 Personal data collected by the Company

The Company collects and uses diverse types of personal data. The types of personal data vary in line with the nature of data subject's businesses transacted with the Company. The personal data is also compiled only for the type needed for the operation according to the nature of the respective business. Some examples of the types of data collected are:

- (1) Identity data, such as name, identification card number, nationality and date-month-year of birth.
The Company may also collect sensitive data for necessary cases, e.g. biometric data, criminal record data, health data, religious belief, and ethnical data, etc. Consideration and special caution are given to the data compilation to ensure compliance with the laws.
- (2) Contact data like address, telephone number, email address, etc.
- (3) Other personal data, such as educational background, career and work background, preferences and taste, and others.
- (4) Finance and banking data, such as assets and liabilities, bankruptcy status, etc.
- (5) Data from interaction between the personal data owner and the Company, such as data from the Company's branch offices, website, application and social media account, meetings, telephone calls, chats, email, interviews, data relating to your devices, etc.
- (6) Data on contact with the Company, e.g. records of pictures and moving pictures while the data owner enters the Company's office, etc.

In this connection, the Company does not compile personal data in relation to political views, genetic data and sexual behavior.

5.2 Sources of data

The Company's collection of personal data related to the data subject may be in cases where you provide the data directly to the Company by way of:

- (1) Signing of contract, filling of application forms for use of products or services and agreements, answering of questionnaires, registration or submission of claims or request for exercise of rights.
- (2) Contact with the Company through various channels, such as telephone, email, etc.
- (3) The Company may have automatic data collection, such as when you use the Company's website or application.
- (4) Procedures of procurement of services from external parties or rent of space, signing of service employment contract/rent contract, filling of application forms, answering of questionnaires, registration or procedures of claim submission or request for exercise of rights.

In certain cases, the Company may compile personal data related to the data subject although the Company has no direct relation with the data subject. Such cases in diverse nature are, for instance, when it is necessary for the employer of the personal data subject to provide the data subject's data to the Company, or when it is necessary for a person having direct relation with the Company to provide the data subject's data to the Company, etc.

6. Use of Personal Data

Activities in which personal data is processed by the Company are carried out on the following legal bases:

- 6.1 Compliance with the contract or taking actions according to your request before entering into a contract between the Company and the data owner
- 6.2 Legitimate interests of the Company
- 6.3 Performance of legal obligation
- 6.4 Taking action to fulfill the purpose consented to by the data owner

The Company collects and retains personal data for use in the operation to achieve its lawful purposes, e.g. for examination of asset-related information, examination of debtor/asset bidder's background, consideration and arrangement of financial solutions and payment modes, providing offers and sales promotion suitable for the customers, general operation of the organization, compliance with the orders of authorities and taking actions in accordance with the regulations and laws, enforcement of lawful rights, and so forth. The Company manages to ensure that only the Company's employees or authorized persons who are in charge of performing tasks or fulfilling the purposes stated in this Policy have the right to access personal data of the data subject.

7. Disclosure of Personal Data

It may be necessary for the Company to use services from external providers, representatives, contractors/sub-contractors and/or any service providers which requires processing of your personal data, e.g. collateral security appraiser, company engaged to conduct information technology development, auditor, lawyer or prosecution service provider, legal advisor or any other advisors, etc. This means the Company may be required to disclose your personal data to these parties. In such case, the Company shall make an agreement between the Company and such external service provider to ensure protection of the privacy of the data subject and the external service provider having appropriate security measures for processing your personal data at all times.

The Company is also required by the applicable laws to disclose personal data in accordance with the legal provisions, such as the laws, regulations and orders of the Bank of Thailand, Anti-Money Laundering Office, Stock Exchange of Thailand, Office of the Securities and Exchange Commission, Revenue Department, Ministry of Finance, etc., or when there is necessity for the establishment of, compliance with, or exercise or defense of legal claims.

Moreover, in case the Company receives your consent to the processing of the personal data, the Company will disclose such information to the person or agency for the purpose stated in the Privacy Notice or according to the agreement or provisions of the laws, as the case may be, and shall keep you informed during the processing of the personal data.

8. Personal Data Storage Period

The Company keeps your personal data for a period so long as necessary for the purpose of compilation, use or disclosure of personal data stated in this Notice. The basis for determining the storage period covers the duration of the Company's relationship with and service provision to you, and may be extended for another period as required to fulfill legal obligation or legal case prescription, for the establishment of, compliance with, exercise or defense of legal claims, or for other reasons according to the Company's internal policy or regulations concerning retention and destruction of documents.

After expiry of the personal data storage period, the Company shall complete the erasure or destruction of personal data or anonymize data no longer needed for use or upon the end of the period required by law.

9. Rights of Personal Data Owner and Exercise of Rights

Your rights under the laws are as follows:

9.1 Right of access to data: The data owner may request to see his/her personal data in the Company's possession and to obtain a copy of such data.

9.2 Right of rectification: The data owner may notify the Company to rectify his/her personal data if such data is found to be incorrect or incomplete.

9.3 Right of erasure: The data owner may request the Company to erase his/her personal data if it is found to be no longer needed for use.

9.4 Right to prohibit processing of personal data or right to object processing of personal data: The data owner may request the Company to stop or suspend the processing of his/her personal data.

9.5 Right to withdraw consent: If the data owner has consented to the Company's processing of personal data in any subjects, the data owner may withdraw such consent at any time.

9.6 Right of data portability: The data owner may request the Company to send a copy of his/her personal data in the Company's possession to another personal data controller in a structured form of common usage and computer readability.

Use of the above-mentioned rights of the personal data subject may be restricted by the relevant laws and, in some cases, when it is necessary for the Company to reject or be unable to fulfill the request to exercise your rights mentioned above if the Company has lawful reasons for such rejection.

In case the personal data owner is notified of such rejection to the request to exercise the rights or it is viewed that the Company breaches or fails to comply with the Act, the personal data owner may lodge a complaint to complaint-receiving unit of the Company or supervisory authorities under the law.

Channels for exercise of rights

You may exercise your rights as a personal data owner through the following channels:

- Name: Bangkok Commercial Asset Management Public Company Limited
- Address: 99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500
- Contact channels:

Contact by	Channel	Working hours
Walk-in	Headquarters/branch offices	Mon-Fri: 08.30-17.00 hrs.
Call center	Tel. 0-2630-0700	Mon-Fri: 08.30-17.00 hrs.
Website	Contact	24 hours
Email	Customercare@bam.co.th	24 hours

10. Personal Data Security Measures

10.1 Proceeding concerning personal data security measures

The Company puts in place appropriate security measures to prevent loss, or unauthorized or wrongful access, use, alteration or disclosure of personal data, and requires that its personnel take actions in accordance with the Company's information and cyber security policy and procedure

10.2 Data processing by data processor

The Company supervises the persons assigned to process personal data by order or on behalf of the Company to ensure appropriate security measures.

11. Compilation of Data according to Original Purpose

The Company has the right to continue compiling and using your personal data which has been collected by the Company before the effective date of the Act for the section concerning compilation, utilization and disclosure of personal data according to the original purpose. In case you do not wish to have the Company collect and use such personal data, you may notify the Company and request withdrawal of such consent at any time.

12. Contact Channels

In case of enquiries or for further information concerning personal data protection, compilation, utilization or disclosure of information, please contact the Company and/or the Data Protection Officer through the following channels:

1. Bangkok Commercial Asset Management Public Company Limited

99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500

Tel. 0-2630-0700

Website: <https://www.bam.co.th>

2. Data Protection Officer (DPO)

- 99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500
- Contact: E-mail: dpo@bam.co.th

13. Revision of the Privacy Notice

The Company may change or revise this Privacy Notice from time to time and shall publish the updated version of the Notice on its website (www.bam.co.th).

Given on June 1, 2022.