



*Announcement of Bangkok Commercial Asset Management Public Company Limited regarding the Personal Data Protection Policy*

*According to the board of director meeting no. 7/2020 on May 8, 2020, the board of directors approved the personal data protection policy. In order to comply with the Personal Data Protection Act 2019 and relevant laws and regulations, the board endorsed this personal data protection policy as a guideline for the company's operation as per the following details.*

*1. Introduction*

*Bangkok Commercial Asset Management Public Company Limited has developed and published this personal data protection policy to describe the information regarding the collection, usage, and disclosure of personal data of data subjects which are the Company's current and future debtors/clients, the Company's employees, and any data subjects contacting the Company, and also the measures to safeguard the personal data, and the processes to manage such data pursuant to the requirements of the Personal Data Protection Act 2019.*

*As a data controller, the Company is responsible for any personal data it collects and processes. This Privacy Policy contains the information about what personal data are collected, how they are processed, what objectives of using them are, how they are disclosed, how and how long they are kept, what security measures are, what data subject's rights are, and how they can be exercised. Any further information may be provided where necessary when a data subject apply for specific products or services.*

*2. Objectives*

- 2.1 To regulate the personal data management of the company so that it is effective and complies with the laws;*
- 2.2 To provide a clear guideline of the Company regarding how to legally perform the collection, the usage, the disclosure, and other activities relating personal data;*
- 2.3 To prevent infringement of data subject's rights relating to their personal data; and*
- 2.4 To inform data subject on processes relating personal data.*

*3. Definitions*

- The Company means Bangkok Commercial Asset Management Public Company Limited.*
- PDPA means the Personal Data Protection Act 2019 of Thailand and its amended versions.*
- Personal Data means, as defined by PDPA, any information relating to a living person which can be used to directly or indirectly identify such person.*
- Data Subject means any living individual who can be identified by their personal data.*
- The Policy means this privacy policy.*

#### 4. The Principles of Personal Data Protection

*The Company has integrated the key concepts of data protection into its operations and ensures that the staff at all levels have adopted the following principles into their daily procedures, from the phase of project planning to the implementation:*

- 4.1 *Lawfulness, fairness and transparency: the Company will process personal data only on lawful basis and will develop clear processes about how it collects and uses personal data.*
- 4.2 *Purpose limitation: the Company will process personal data only for the original purposes specified when the personal data are being obtained unless for compatible purposes or a clear legal obligation.*
- 4.3 *Data minimization: the Company will collect and use personal data only to the extent necessary to fulfill the processing purposes.*
- 4.4 *Accuracy: the Company will take reasonable actions to ensure the personal data it holds are correct and up to date.*
- 4.5 *Storage limitation: the Company will not retain personal data for longer than it needs them unless it has to comply with applicable document keeping standards or public regulations.*
- 4.6 *Integrity and confidentiality: the Company will have appropriate technical and organizational measures in place which ensure appropriate level of security for personal data it holds.*
- 4.7 *Accountability: the Company will have appropriate documentation and measures in place to ensure that it takes responsibility for its operations on personal data and it can demonstrate that it complies with all personal data protection principles.*

#### 5 The Collection

##### 5.1 The Personal Data Collected

*The Company collects various types of personal data. Depending on the types of business the data subjects have with the Company, the Company collects and uses types of personal data to carry out its activities only to the necessary extent. The followings are the examples of the types of personal data the Company collects:*

- (1) *identification information (e.g. name, ID number, nationality, IP address);*
- (2) *contact information (e.g. address, phone number, email address);*
- (3) *educational background;*
- (4) *professional activities and employment information;*
- (5) *banking and financial data (e.g. assets and liabilities, bankruptcy status);*
- (6) *data relating your preferences;*
- (7) *data from interactions between data subject and the Company (e.g. through the Company's branches, the Company's website, applications, and social media pages, meetings, calls, chats, emails, interviews);*
- (8) *photos or videos of data subject when they visit the Company's premises;*
- (9) *data related to data subject's devices (e.g. brand, model); and*
- (10) *location (e.g. geolocation from cookies).*

*The Company may collect sensitive data such as biometric data, criminal record, health data, religious belief and ethnic origin, if necessary, with appropriate precautions in order to comply with applicable laws.*

*The Company will not collect personal data related to political opinions, genetic data, and sex orientation.*

## *5.2 The Sources of the Data*

*The personal data the Company collects may be either directly provided by the data subject or obtained from other sources. Also, in certain situations, the Company collects and uses personal data of individuals whom it has, could have, or used to have direct relationship with the Company.*

*In some circumstances, the Company collects personal data even it does not have direct relationship with the data subject. This may occur in several ways such as when the data subject's employer has to provide the information of its employees to the Company or a person who has direct relationship with the Company needs to provide the Company of such information.*

## *6. The Usage of Data*

*The Company's processing activities are based on the following legal bases as necessary:*

- 5.1 to perform obligations according to the binding contracts or to take steps at the request of the data subject prior to entering into a contract between the data subject and the Company;*
- 5.2 to fulfill the Company's legitimate interests;*
- 5.3 to comply with relevant laws and regulations which impose the Company legal obligations; and/or*
- 5.4 to complete transactions or business under the data subject's consent.*

*The Company collects and stores personal data to use for multiple purposes e.g. to conduct due diligence on target properties, to examine the background of the debtor or proposed buyers, to tailor appropriate financial programs and payment options, to offer deals and promotions suitable to clients, to carry out general corporate operations, to address official orders and maintain compliance with laws and regulations, and to enforce our legal rights. The Company will make sure that the access to the data subject's personal data is limited to the employees or the authorized persons who are responsible for performing and fulfilling objectives mentioned in this Privacy Policy.*

## *7. The Disclosure of the Data*

*The Company may need to use sub-contractors to process personal data which mean the Company will have to transfer or disclose the data subject's personal data to them. When using sub-contractors, the Company will always enter into a Data Processing Agreement (DPA) to safeguard the data subject's privacy ensuring that the processors will provide adequate level of data protection for the personal data they process at all time.*

Furthermore, the Company is also required by applicable laws to disclose personal data in order to comply with legal obligations according to laws, regulations, and orders imposed by , for example , Bank of Thailand, Anti Money Laundering Agency, Stock Exchange of Thailand, Securities & Exchange Commission, Revenue Department, Ministry of Finance, or to establish, exercise or enforce legal rights.

Otherwise, in case the Company obtains data subject's consent to process their personal data, the Company will disclose it to specific parties and for objectives according to the privacy notice given to such data subject at the stage of personal data collection.

#### *8. The Storage Duration of Personal Data*

The Company will store personal data only so long as it is necessary to fulfill the specific purposes as specified in this Policy. The factor which indicates the storage duration is the duration that the Company maintains relationship with the data subject and provides service to them. However, the duration may be extended for a reasonable period such as in order to comply with legal obligation or prescription, to establish, perform, or enforce legal rights, to resolve legal disputes, or other causes according to the Company's policies and regulations.

When any personal data is no longer necessary and its storage duration is expired, the Company will delete, destroy, or anonymize them.

#### *9. Security Measures*

##### *9.1 The Operation regarding the Security Measures*

The Company implements appropriate security measures to protect personal data from unlawful or unauthorized access, usage, modification, alteration, disclosure or loss.

##### *9.2 The Processing of Data Processor*

The Company will monitor any third party the Company assigned to process personal data by instruction or on behalf of the Company to provide appropriate security measures.

#### *10. Updating Personal Data*

The Company will make reasonable effort to update personal data under the Company's control to be correct and up to date once the company has acknowledged or has been informed of the change by the data subject or other sources to comply with legal requirements.

#### *11. Data Subject's Rights and Their Execution*

According to the law, a data subject has following rights:

- 11.1 Right of access: a data subject can obtain their personal data the Company holds and request a copy of such data.
- 11.2 Right to rectification: a data subject can request the Company to rectify any personal data about them that is inaccurate or incomplete.

- 11.3 *Right to erasure: a data subject can request the Company to erase their personal data which are no longer necessary for the Company to use.*
- 11.4 *Right to restriction and right to object: a data subject can request the Company to stop or withhold their personal data from the Company's processing.*
- 11.5 *Right to withdraw consent: if a data subject has given consent to process their personal data, they may withdraw their consent at any time.*
- 11.6 *Right to data portability: a data subject can request the Company to send a copy of their personal information the Company holds in a structured, commonly used and machine-readable format to another data controller.*

*The execution of mentioned rights may be restricted by applicable laws. For some cases, the company may reject or be unable to proceed with the request of the mentioned rights such as to comply with laws or court orders, for public interest, or such execution may be harmful to a third party's rights or freedom. In case the Company rejects a request, the Company will notify the reason to the data subject.*

*A data subject has the right to lodge a complaint to our complaint division or the public regulator should their data subject's request is rejected or they believe that the Company is not complying with the PDPA.*

## *12. Cookies*

*The Company's website uses cookies. Cookies are small text files which enable the website to function appropriately and enhance the users' experience during their visits by gathering information from the user's device. In general, there are two types of cookies websites employ: the necessary cookies and the optional cookies. The necessary cookies we use do not need website users' consent, while the optional cookies do. The Company will always ask for data subject's explicit permission before the Company establishes optional cookies on their device. In case a data subject has given the consent to do so, they can always manage settings of these cookies.*

## *13. The Browsing through the Company's Website*

*The company's application and website are governed by this Policy. In case a user visit third party websites through the Company's website, the personal data protection of such visit would be governed by relevant websites' personal data protection policy and the Company is not responsible for such visit.*

## *14. The Revision of this Policy*

*The Company may review and update this Policy as it seems appropriate to ensure that the personal data will be properly protected. In case there is any change to this Policy, the Company will notify data subject of such change through the Company's website (<http://www.bam.co.th>) or by other appropriate means.*

*15. Contact Information*

*If a data subject has any inquiry about personal data protection, the collection, usage, or disclosure of personal data, or would like to execute any right as per this Policy, please contact the Company and/or Data Protection Officer via following channels:*

*Bangkok Commercial Asset Management Public Company Limited*

*99 Surasak Road, Silom, Bangrak, Bangkok 10500*

*Telephone: 0-2630-0700*

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