

Privacy Notice

Last Updated: 1 June 2024

Dear Investors/ Shareholders or Your Proxy Holders,

CIMB Thai Bank Public Company Limited (“**Bank**”) values a privacy and strives for protecting your personal data (“**Personal Data**”) based on the laws of Thailand according to the Personal Data Protection Act B.E. 2562 (2019) for the collection, use, and/or disclosure of your Personal Data during and for the purposes related to your investment as set forth herein (“**Privacy Notice**”).

This Privacy Notice explains: -

- What kind of Personal Data does the Bank collect? This includes what you tell the Bank about yourself (“**you**”, “**your**” or “**yourself**”) and what the Bank learnt during the period of your investment.
- How does the Bank use your Personal Data?
- Who does the Bank disclose the Personal Data to?
- What are the choices the Bank offers including how to access and update your Personal Data?
- What are your privacy rights and how does the law protect you?

1. Collection of Personal Data

The Bank collects many different kinds of the Personal Data, depending on various circumstances that are relevant to investments and requests.

The Bank collects the Personal Data about you from a variety of sources, including but not limited to: -

- From you directly during your investment;
- The information the Bank has received during your investment regardless of format, including face-to-face, telephone or video call;
- Identification documents such as ID card, passport, or any other documents issued by government agencies, etc.;
- Other forms completed by you during your investment at the Bank;
- The correspondences with you through meetings or other assessments e.g., CCTV, recording equipment, etc.;
- When the Bank receives Personal Data of you and/or a person, who is on behalf of you both directly from the data subject and/ or from the data collection executed by the securities registrar, e.g. Securities and Exchange Commission.

In some instances, the Bank may collect the Personal Data about you from third parties or publicly available sources related to your investment and/or your transactions with the Bank.

The categories of Personal Data about you that the Bank collects, subject to the applicable law, include but not limited to: -

- **Personal details:** Name, last name, gender, date of birth, marital status, personal identification number, passport number, other government-issued identification number(s), tax identification number, shareholder account ID, nationality, image of ID card, passport, signatures, authentication data, information provided by you as an answer to the Bank (e.g., passwords, facial and voice recognition data, etc.), photographs, voice recording and CCTV images;
- **Family details:** Names and contact details of family members and dependents;
- **Contact details:** Address, telephone number, email address and social media profile details;
- **Transactional data:** The details of your share investment amount, bank account, deposit account number, tax payment, and broker;
- **Electronic data:** All above data in electronic form, IP addresses, activity logs, online identifiers, unique device identifiers, *electronic data for verification of meeting attendance* and other technical data which are related to your attended meeting and investments.
- **Sensitive Personal Data:** The Personal Data that the law specifically prescribes, including information about your race, ethnic origin, religion, or philosophical beliefs, health data, disability, or any other information which affects you in the same way as announced by the Personal Data Protection Committee.
- **Other Data:** Other personal data which has been collected, used and/or disclosed relating to relationship with the Bank, such as information given by a juristic person to the Bank in relation to the investment and/or activities with the Bank, and other personal data which are related to your investment or activities with the Bank deemed as Personal Data under the laws governing the personal data protection.

During your investment at the Bank, the Bank may also collect some sensitive Personal Data about you to make reasonable adjustments of working environment to better suit your religion or beliefs, to provide you with access to the workplace and the Bank system, and to comply with related laws. The Bank will not collect, use and/or disclose this type of data without your consent unless the law allows the Bank to do so.

If you provide Personal Data of any other third party who has involvement with you to the Bank such as proxy holders, contact persons and/or any other persons per document of your transaction, etc., please inform those persons of the details under this Privacy Notice and request their consent, if necessary, or apply other lawful bases to ensure that Bank can collect, use and/or disclose Personal Data of the aforementioned third party.

2. Use of Personal Data

The Bank may collect and use your Personal Data only if the Bank have proper reasons to do so. This includes sharing it outside the Bank.

The Bank will rely on one or more of the following lawful grounds when collecting, using and/or disclosing your Personal Data: -

- When it is to fulfill a contract the Bank has with you (contractual basis) – that is when the Bank needs your Personal Data to fulfill your investment or before entering into a contract with you;
- When it is the Bank's legal obligation (legal obligation) – that is when the Bank needs to collect, use and/or disclose your Personal Data to comply with the law or statutory obligation;
- When it is in the Bank's legitimate interest (legitimate interest) – that is when the Bank collects, uses and/or discloses your Personal Data for the Bank's legitimate interest as permitted under the law, so long as your fundamental rights are not overridden by the Bank's legitimate interest; and/or
- When you consent to it (consent) – that is when you allow the Bank to collect, use and/or disclose your Personal Data for certain purposes.
- When it is necessary to the Bank to collect, use and/or disclose your Personal Data permitted by the Personal Data Protection Act B.E. 2562 (2019).

The Personal Data Protection Act B.E. 2562 (2019) considers some personal data to be more sensitive and therefore treats this type of Personal Data more stringently. In this regard, the Bank will not collect, use and/or disclose this type of Personal Data without your consent unless the law allows the Bank to do so. If the Bank will collect, use, and/or disclose such sensitive Personal Data, it will only do so upon your consent or only for one of the following purposes:

- For management of affairs related to your investment;
- For the prevention or suppression of danger to life (vital interest);
- For the compliance with a law to achieve the purposes with respect to investment protection;
- For establishing, compliance, exercising and/or defending legal claims.

The purposes for which the Bank may collect, use and/or disclose your Personal Data, subject to the applicable law, and legal basis on which the Bank may perform such collection, use and/or disclosure, are: -

Purposes of data collection, use and/or disclosure	Lawful basis for collection, use and/or disclosure
Compliance with Laws and Corporate Governance Principles	
<ul style="list-style-type: none"> • To contact you about your investment and other matters as requested by you. 	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest

Purposes of data collection, use and/or disclosure	Lawful basis for collection, use and/or disclosure
<ul style="list-style-type: none"> • To identify your identity and communication with the Bank. • To manage the investment and meeting process. • To submit, register, report, and/or disclose as required by relevant authorities (e.g. Ministry of Commerce, Securities and Exchange Commission). • To prevent and detect money laundering or financing of terrorism and comply with regulation relating to sanctions and embargoes through the Bank's Know Your Customer (KYC) process (to identify you, verify your identity, screen your details against sanctions lists and determine your profile) and perform a Due Diligence (DD) as prescribed by anti-money laundering law and other relevant law. • To comply with applicable laws and regulations. • To execute various affairs, e.g. management of shareholders' meeting, verification of identity and signature for entering into transaction or exercising statutory rights as a shareholder, document submission, which are in compliance with relevant laws and regulations, e.g. laws governing public limited companies, rules governing the financial institutions' business. • To execute various affairs for legitimate interest purpose, e.g. shareholders' meeting minutes taking, recording/ broadcasting of photos, videos or voice during the meeting, implementing security measures. 	
Business operation	
<ul style="list-style-type: none"> • To disclose and/or use in publications, articles, letters or other documents of the Bank (e.g. annual reports (currently, "one report"), website). 	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest

Purposes of data collection, use and/or disclosure	Lawful basis for collection, use and/or disclosure
Benefits and Risk Management	
<ul style="list-style-type: none"> • To pay return and other benefits related to your investment. • To deduct tax. • To maintain accurate and up-to-date Investor/Shareholder records, including details of contact. • To ensure a security of premises, data and technology. • To respond to and defend against legal claims (including to bail-out, as the case may be). 	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest

When the Bank relies on the legitimate interests as the reason for collecting, using and/or disclosing the Personal Data, it has considered whether your fundamental rights are overridden by the Bank's legitimate interests and has concluded that they are not.

If you fail to provide your Personal Data to the Bank

Where the Bank is required by laws to collect your Personal Data or need to collect your Personal Data due to or in connection with your investment and you fail to provide your Personal Data when requested, the Bank may not be able to perform obligation the Bank has with you or plans to have with you. In this case, the Bank may not be able to process activities related to your investment or will not be able to administer and/or manage the purposes for which Personal Data was requested or collected, and you may be denied remuneration and other benefits as a result of the Bank's inability to use your Personal Data for consideration, but the Bank will notify you if this is the case at the time your Personal Data is collected.

3. Disclosure of Personal Data

The Bank may share your Personal Data with others where it is lawful to do so, including where the Bank or other person: -

- needs to provide you with the requirement under the obligations that the Bank has with you as Investors/Shareholders or Your Proxy Holders;
- has a legal duties to do so
- needs to proceed with, in connection with a regulatory reporting (e.g., to the Ministry of Commerce, the Securities and Exchange Commission, the Stock Exchange of Thailand, Thailand Securities Depository Co., Ltd., etc.), litigation, asserting or defending legal rights and interests;
- has legitimate interest to do so (e.g., manage risk, internal record, etc.);
- asks for your consent to disclose such Personal Data, and you consent to it; and/or

- promotes the Bank's public relation activities where you have attended or are in such activities area.

The Bank may share your Personal Data for the above purposes with others, including: -

- other CIMB Group companies and any sub-contractors, agents or service providers who work for the Bank or provide the services to the Bank or other CIMB Group companies, including their employees, sub-contractors, service providers, directors and officers
- government authorities, regulators, and relevant persons or agencies e.g. Ministry of Commerce, Securities and Exchange Commission, Stock Exchange of Thailand, Thailand Securities Depository Co., Ltd., courts, competent authorities;
- any sub-contractors, agents or service providers who work for the Bank or provide the services related to the investment-related work (including working system, registration with government entity);
- the Bank's advisors or experts; anyone who provides instructions or operates any of your investments and/or activities on your behalf (e.g., Power of Attorney, solicitors, etc.);
- anybody else that the Bank has been instructed by you to share your Personal Data; and/or
- any person entering the area or passing through the area where the Bank organizes activities or has seen the Bank's public relations media.

Except as described in this Privacy Notice, the Bank will not use the Personal Data for any purposes other than the purposes as described to you in this Privacy Notice. Should the Bank intend to collect, use or transfer additional information which are not described in this Privacy Notice, the Bank will notify you and obtain your consent prior to the collection, use and disclosure unless the Bank is permitted to do so without your consent under the law. You will also be given the opportunity to consent or to decline such collection, use and/or transfer of your Personal Data.

The Bank will continue to adhere to this Privacy Notice with respect to the information the Bank has in its possession relating to prospective, existing and former Investors/ Shareholders or Your Proxy Holders.

Cross-border Transfer of Personal Data

Your Personal Data may be transferred to and collected and/or used in other countries, including Malaysia.

However, such countries may not have the same level of protection for the Personal Data as Thailand. In the event that the Bank does this, the Bank shall ensure that such countries have an appropriate level of Personal Data protection measures or that the transfer is lawful. For example, your Personal Data may be shared to other CIMB group companies in accordance with the Bank's Binding Corporate Rules (BCRs) or other relevant contractual arrangements, which require all CIMB Group companies to follow the same rules or terms when collecting, using and/or disclosing your Personal Data.

The Bank may need to transfer the Personal Data in this way to perform the obligations to fulfill the legal obligations, protect the public interests and/or for the Bank's legitimate interests.

In some countries, the law might compel the Bank to share certain Personal Data e.g., with tax authorities. Even in these cases, the Bank will only share the Personal Data with people who have the right to see it.

4. Retention of Personal Data

The Bank will only retain your Personal Data for as long as it is necessary to carry out the purposes for which it was collected, that is, for business reasons, or compliance with the applicable laws.

The Bank will keep your Personal Data for up to 11 years after the duration of your investment. However, in the event of regulatory or technical reasons, the Bank may keep your Personal Data for more than 11 years.

5. Accuracy of your Personal Data

The Bank needs your help to ensure that your Personal Data is current, complete and accurate. Please inform the Bank of any changes to your Personal Data by:

- Contacting the Bank's representative at our branches or CIMB Thai Care Center Tel. [0 2626 7777](tel:026267777)
- Emailing to cs@cimbthai.com

The Bank will occasionally request the updates from you to ensure the Personal Data the Bank uses to fulfil the purposes of collection, use and/or disclosure are current, accurate and complete.

6. Your rights as data subject

Under certain circumstances, you have rights under data protection law in relation to your Personal Data. It is the Bank's policy to respect your rights and the Bank will act promptly and in accordance with any applicable law, rule or regulation relating to the collection, use and/or disclosure of your information.

Details of your rights are set out below: -

- **Right to withdraw consent:** When the Bank collects, uses and/or discloses your Personal Data under your consent, this right enables you to withdraw your consent to the Bank's collection, use and/or disclosure of your Personal Data, which you can do at any time. The Bank may continue to collect, use and/or disclose your Personal Data if the Bank has another legitimate reason to do so.
- **Right to access:** This enables you to receive a copy of your Personal Data from the Bank.
- **Right to correct:** This enables you to have any inaccurate, outdated and/or incomplete Personal Data corrected. Please see above in 5. (Accuracy of your Personal Data) for detail of how you can request to have your Personal Data corrected.

- **Right to erasure:** This enables you to ask the Bank to delete, destroy or anonymize your Personal Data where there is no good reason for the Bank to continue collecting, using and/or disclosing it. You also have the right to ask the Bank to delete your Personal Data where you have exercised your right to object to collection, use and/or disclosure (see below). This is not a blanket right to require all Personal Data to be deleted. The Bank will consider each request carefully in accordance with the requirements of any laws relating to the collection, use and/or disclosure of your Personal Data.
- **Right to object:** This enables you to object to the collection, use and/or disclosure of your Personal Data where the Bank is relying on the legitimate interest. You also have the right to object where the Bank is collecting, using and/or disclosing your Personal Data for investment-related purposes and profiling activities.
- **Right to restrict collection, use and/or disclosure:** This enables you to ask the Bank to suspend the collection, use and/or disclosure of your Personal Data, for example, if you want the Bank to establish its accuracy or the reason for collecting, using and/or disclosing it.
- **Right to portability:** In certain circumstances, you can request to receive a copy of your Personal Data in a commonly used electronic format. This right only applies to your Personal Data that you have provided to the Bank. The right to data portability only applies if the collection, use and/or disclosure is based on your consent or if the Personal Data must be collected, used and/or disclosed for the performance of obligation under the laws or regulatory rules.
- **Right to lodge a complaint:** This enables you to file the complaint with a related government authority, including but not limited to, the Thailand Personal Data Protection Committee in the case where, in your view, the Bank, the Bank's employee or contractor violates or fails to comply with the Personal Data Protection Act of Thailand B.E. 2562 (2019) or notifications issued thereunder.

You may exercise any of your rights at any time using the contact details set out in 10. (Contact us) below. You will not have to pay a fee to access your information (or to exercise any of the other rights). However, the Bank may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, the Bank may refuse to comply with your request in these circumstances.

The Bank may need to request specific information from you to help the Bank confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that your Personal Data is not disclosed to any person who has no right to receive it. The Bank may also contact you to ask you for further information in relation to your request to speed up the Bank's response.

The Bank tries to respond to all legitimate requests within 30 days. Occasionally, it may take the Bank longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, the Bank will notify you and keep you updated.

Handling of complaints

In the event that you wish to make the complaint about how the Bank collects, uses and/or discloses your Personal Data, please contact the Bank at cs@cimbthai.com and the Bank will try to consider your request as soon as possible. This does not prejudice your right to file the complaint with a government authority or the Personal Data Protection Committee.

7. Security of your Personal Data

Information is the Bank's asset and therefore the Bank places a great importance on ensuring the security of your Personal Data. The Bank regularly reviews and implements up-to-date physical, technical and organizational security measures when collecting, using and/or disclosing your Personal Data. The Bank has internal policies and controls in place to ensure that your Personal Data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by the Bank's employees in the performance of their duties. The Bank's employees are trained to handle the Personal Data securely and with utmost respect, failing which they may be subject to a disciplinary action.

8. Your responsibilities

You are responsible for making sure that the Personal Data you give the Bank or provided on your behalf, is accurate and up to date, and you must tell the Bank as soon as possible if there are any updates.

Certain Personal Data, such as contact details, and payment details, must be provided to the Bank in relation to your investment and transaction. If you do not provide such Personal Data, this will hinder the Bank ability to administer the rights and obligations arising as a result of your investment relationship efficiently.

9. Revision of the Bank's Privacy Notice

The Bank keeps the Privacy Notice under a regular review and thus the Privacy Notice may be subject to change. The date of the last revision of the Privacy Notice can be found on the top of the page.

10. Contact us

If you have any questions in regard to the protection of your Personal Data or if you wish to exercise your rights, please contact:

- Any Customer Service Officer at any of the Bank's branches
- CIMB THAI Care Center Tel. 0 2626 7777
- Data Protection Officer: E-mail: dpo@cimbthai.com
- CIMB THAI Bank Public Company Limited Head Office, 44 Lang Suan Road, Lumpini, Pathumwan, Bangkok 10330
- CIMB THAI Digital Banking Application (Right to withdraw consent only)