

Privacy Policy

Asia Plus Group Holdings Public Company Limited and its Subsidiaries

Asia Plus Group Holdings Public Company Limited and its Subsidiaries (the "**Company**") recognizes the importance of the protection of your Personal Data and customer's (as defined below).

This privacy notice (the "**Privacy Policy**") applies to the Personal Data (defined below in section 1) of (1) our prospective, current and former individual customers, and (2) employees, personnel, officers, representatives, shareholders, authorized persons, members of the board of directors, contact persons, agents, and other natural persons in connection with our prospective, current and former corporate customer, and our subsidiaries listed as follows:

- 1) Asia Plus Securities Company Limited
- 2) Asia Plus Advisory Company Limited
- 3) Asset Plus Fund Management Company Limited

As per reference made in this policy, natural/individual persons, together as "**you**" or "**your**" and the individual client and the corporate client, together as the "**Client**".

This Privacy Policy describes how we collect, use, disclose and cross-border transfer your Personal Data. This Privacy Policy applies to our business, websites, mobile applications, call centers, events and exhibitions, online communication channels, other locations and any means where we collect, use disclose, or cross-border transfer your Personal Data.

1. Personal data we collect

"**Personal Data**" means any identified or identifiable information about you as listed below. In order to offer the Client our services, we might collect your information in a variety of ways. We may collect your Personal Data directly from you (e.g. through our relationship manager, salesperson, or call center) or indirectly from other sources (e.g. social media, third party's online platforms, and other publicly available sources) and through our affiliates, service providers, business partners, official authorities, or third parties (e.g. third-party custodians, sub-custodians, and brokers). Which specific types of data collected depends on the Client's relationship with us, and which services or products the Client requires from us.

"**Sensitive Data**" means Personal Data classified by law as sensitive data. We will only collect, use, disclose and/or cross-border transfer Sensitive Data if we have received your explicit consent or as permitted by law.

Individual Client

We will collect, use, disclose and/or cross-border transfer the following categories and types of your Personal Data, including but not limited to:

- (a) **Personal details**, such as your title, name, gender, age, occupation, job title, salary, work place, work position, education, nationality, date of birth, marital status, information on government-issued cards (e.g. national identification number, passport number, tax identification number, driver's license details), signature, voice recording, phone records, picture, CCTV records, house registration, and other identification information;

- (b) **Contact details**, such as your address, telephone number, mobile number, fax number, email address, and other electronic communication ID;
- (c) **Account and financial details**, such as your credit card and debit card information, account number and account type, prompt pay details, current assets, income and expenses, as well as payment details, service and product application details;
- (d) **Transaction details**, such as the type of products (e.g. securities, derivatives), price and quantity, order number, broker number, conditions (if any), trading history and balance, payment and transaction records relating to your assets, financial statements, liabilities, taxes, revenues, earnings and investments, source of wealth and funds, representation, trade information, default record, margin balance, and margin loan record;
- (e) **Technical details**, such as your Internet Protocol (IP) address, web beacon, log, device ID and type, network, connection details, access details, single sign-on (SSO) details, login log, access times, time spent on our page, cookies, login data, search history, browsing details, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on devices you use to access the platform;
- (f) **Profile details**, such as your account identifiers, username and password, PIN ID code for trading, interests and preferences, activities, investment objectives, investment knowledge and experience, and risk tolerance;
- (g) **Usage details**, such as information on how you use the websites, platform, products and services;

Corporate Client

We will collect, use, disclose and/or cross-border transfer the following categories and types of your Personal Data, including but not limited to the followings:

- a) **Identity Data**, such as, first name, last name, title, age, gender, photos, information on CV, education, work-related information (e.g., position, function, occupation, job title, company you work for, employed at or holds shares of), information on government-issued cards (e.g., national identification number, passport number), percentage of shares, signatures, and other identifiers;
- b) **Contact Details**, such as, telephone numbers, address, country, e-mail, and other similar information;
- c) **Personal data generated in connection with the Client's relationship with us**, for example account opening, administration, operation, payment, settlement, processing and reporting, on behalf of the Client. Such Personal Data may include signatures, and your correspondence with us;
- d) **Other information**, collected, used or disclosed in connection with the relationship with us, such as, information you give us in contracts, forms or surveys or data collected when you participate in our business functions, seminars, social events

We will collect, use, disclose and/or cross-border transfer the following Sensitive Data about you:

- (a) biometric data (which is facial recognition, fingerprint);
- (b) health data, such as medical information;

- (c) criminal records;
- (d) religion; and
- (e) sensitive data as shown in the identification document (e.g. race and religion).

2. The Purpose of collection, use or disclosure of your Personal Data

We may collect, use, disclose and/or cross-border transfer your Personal Data and Sensitive Data for the following purposes.

2.1 Purpose for which consent is required

We rely on your consent to:

- (a) provide marketing communications, special offers, promotional materials about the products and services of the Company, our affiliates and subsidiaries and the third parties which we cannot rely on other legal grounds;
- (b) collect, use, and/or disclose your Sensitive Data for the following purposes:
 - (i) biometric data (which is [facial recognition, fingerprint]) for [the access to premises/application and authentication and verification];
 - (ii) health data, such as [medical information] for [facilitation]
 - (iii) criminal records for [background check];
 - (iv) religion for [facilitation];
 - (v) sensitive data as shown in the identification document (e.g. race and religion) for the purpose of authentication and verification; and
- (c) [cross-border transfer your Personal Data to a country which may not have an adequate level of data protection, for which consent is required by law].

Where legal basis is consent, you have the right to withdraw your consent at any time. This can be done so, by contacting us as per contact detail in clause 10. The withdrawal of consent will not affect the lawfulness of the collection, use, and disclosure of your Personal Data and Sensitive Data based on your consent before it was withdrawn.

2.2 Purpose for which we may rely on other legal grounds for processing your Personal Data

We may collect, use, disclose, and/or cross-border transfer your Personal Data by relying on the following legal grounds: (1) a contractual basis, for our initiation or fulfillment of a contract with you; (2) a legal obligation; (3) the legitimate interest of ourselves and third parties, to be balanced with your own interest and fundamental rights and freedoms in relation to the protection of your Personal Data; (4) vital interest, for preventing or suppressing a danger to a person's life, body or health; and (5) public interest, for the performance of a task carried out in the public interest or for the exercise of official actions.

We rely on the legal grounds in (1) to (5) above for the following purposes of collection, use, disclosure, and/or cross-border transfer of your Personal Data:

Individual Client

- (a) contacting you prior to your entering into a contract with us;
- (b) processing applications for account opening, account maintenance, and operations relating to your accounts, including without limitation, processing your applications or requests for services or products, processing your transactions, generating your account statement, and operating and closing your accounts;
- (c) providing services to you, such as financial planner/advisor [securities brokerage, securities dealing, securities underwriting, mutual fund management, private fund management, investment advisory, securities lending and borrowing, derivatives dealing, derivatives brokerage, derivatives advisory, and derivatives fund management services], from time to time and dealing with all matters relating to the services;
- (d) providing investment products, offering choices to you (including investment products of third parties) from time to time and dealing with all matters relating to the investment products;
- (e) managing your relationship with us and administration of your account with us;
- (f) preventing customers with certain limitations (e.g. elderly person) from engaging in certain types of transactions by themselves for the purpose of damage control;
- (g) carrying out your instructions or responding to your inquiries or feedback, and resolving your complaints;
- (h) conducting identity verification and credit checks, know-your-customer (KYC) and customer due diligence (CDD) processes, other checks and screenings, and ongoing monitoring that may be required under any applicable law; using photocopy of personal identification card, residence registration certificate, marriage registration, and other relevant document;
- (i) preventing, detecting and investigating fraud, misconduct, or any unlawful activities, whether or not requested by any governmental or regulatory authority, and analyzing and managing risks;
- (j) complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any governmental, tax, law enforcement or other authorities or regulators (whether local or foreign), such as the Stock Exchange of Thailand, Thailand Futures Exchange, Thailand Securities Depository, Thailand Clearing House, Office of the Securities and Exchange Commission of Thailand, Bank of Thailand, Anti-Money Laundering Office, Thai Revenue Department, and Bank of Thailand;
- (k) managing our infrastructure, internal control, [internal] audit and business operations and complying with our policies and procedures that may be required by applicable laws and regulations including those relating to risk control, security, audit, finance and accounting, systems and business continuity;
- (l) addressing or investigating any complaints, claims or disputes;

- (m) provide marketing communications, information, special offers, promotional materials about the products and services of the Company, our affiliates and subsidiaries and the third parties;
- (n) developing new services and products and updating you on our services and products from time to time;
- (o) carrying out research, planning and statistical analysis, for example, on your investment limit and investment behaviour, for the purpose of developing our services and products;
- (p) organizing our promotional campaign or events, conferences, seminars, and company visits;
- (q) enforcing our legal or contractual rights including, but not limited to, recovering any and all amounts owed to us;
- (r) facilitating financial audits to be performed by an auditor, or receiving legal advisory services from legal counsel appointed by you or us;
- (s) performing our obligations under any agreements to which we are a party, e.g. agreements with our business partners, vendors, or other asset management companies, or under which we are acting as an agent;

If the Personal Data we collect from you is required to meet our legal obligations or enter into an agreement with you, we may not be able to provide (or continue to provide) our products and services to you if we cannot collect your Personal Data when requested.

Corporate Client

- (a) **Business communication**, such as, communicating with the Client about our products or services, e.g., by responding to inquiries or requests;
- (b) **The Client selection**, such as, verifying your identity and the Client status, conducting due diligence or any other form of background checks or risk identification on you and the Client (including screening against publicly available government law enforcement agency and/or official sanctions lists as required if law), evaluating suitability and qualifications of you and the Client, issuance of request for quotation and bidding, execution of contract with you or the Client;
- (c) **The Client data management**, such as, maintaining and updating lists/directories of the Clients (including your Personal Data), keeping contracts and associated documents in which you may be referred to;
- (d) **Relationship management**, such as, planning, performing, and managing the (contractual) relationship with the Client, e.g., by performing transactions and orders of products or services, processing payments, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, providing support services;
- (e) **Business analysis and improvement**, such as, conducting research, data analytics, assessments, surveys and reports on our products, services and your or the Client's performance, development and improvement of marketing strategies and products and services;
- (f) **IT systems and support**, such as providing IT and helpdesk supports, creating and maintaining code and profile for you, managing your access to any systems to which we have granted you access, removing inactive accounts, implementing business controls to enable our business to

operate, and to enable us to identify and resolve issues in our IT systems, and to keep our systems secure, performing IT systems development, implementation, operation and maintenance;

- (g) **Security and system monitoring**, such as authentication and access controls and logs where applicable, monitoring of system, devices and internet, ensuring IT security, prevention and solving crimes, as well as risk management and fraud prevention;
- (h) **Dispute handling**, such as solving disputes, enforcing our contracts, establishing, exercising or defense of legal claims;
- (i) **Internal investigation**, any investigation, complaints and/or crime or fraud prevention;
- (j) **Internal compliance**, such as compliance with internal policies and applicable laws, regulations, directives and regulatory guidelines;
- (k) **Compliance with laws and government authorities**, such as liaising and interacting with and responding to government authorities or courts;
- (l) **Marketing purposes**, such as informing you of our news and publications which may be of interest, events, offering new services, conducting surveys;
- (m) **Complying with reasonable business requirements**, such as management, training, auditing, reporting, control or risk management, statistical, trend analysis and planning or other related or similar activities.

3. How we disclose or transfer your Personal Data

We may disclose or transfer your Personal Data to the following third parties (including their personnel and agents) who process Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located in or outside Thailand. You can visit their privacy policies to learn more details on how they process your Personal Data.

Individual Client

3.1 Asia Plus Group Holdings Company Limited and its Subsidiaries

As Asia Plus Securities Company Limited, Asia Plus Advisory Company Limited, and Asset Plus Fund Management Company Limited is part of Asia Plus Group Holdings Group, we may need to transfer your Personal Data to, or otherwise allow access to such Personal Data by, other companies within Asia Plus Group Holdings Group for the purposes set out above. Please see list of companies and scope of activities within Asia Plus Group Holdings Group at support@asiaplus.co.th or dpo@asiaplus.co.th.

3.2 Our service providers

We may use other companies, agents or contractors to perform services on our behalf or to assist with the provision of products and services to you. We may share your Personal Data to these service providers, including but not limited to: (a) IT service providers; (b) research agencies; (c) analytics service providers; (d) survey agencies; (e) marketing, advertising media

and communications agencies; (f) payment service providers; and (g) administrative and operational service providers.

In the course of providing these services, the service providers may have access to your Personal Data. However, we will only provide our service providers with the Personal Data that is necessary for them to perform the services, and we ask them not to use your Personal Data for any other purposes. We will ensure that all the service providers we work with will keep your Personal Data secure.

3.3 Our business partners

We may transfer your Personal Data to persons acting on your behalf or otherwise involved in the provision of the type of product or service you receive from us, including payment recipients, beneficiaries, account nominees, intermediaries (such as third-party securities companies, or asset management companies), custodians, correspondents, agents, vendors, co-brand business partners, market counterparties, issuers of products, or global trade repositories to whom we disclose Personal Data in the course of providing products and services to you and whom you authorize us to disclose your Personal Data to, provided that these data recipients agree to treat your Personal Data in a manner consistent with this Privacy Policy.

3.4 Third parties permitted by law

In certain circumstances, we may be required to disclose or share your Personal Data to a third party in order to comply with legal or regulatory obligations. This includes any law enforcement agency, court, regulator, government authority or other third party for which we believe disclosure or transfer is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party's or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues.

3.5 Professional advisors

We may disclose or transfer your Personal Data to our professional advisors relating to audit, legal, accounting, and tax services who assist in running our business and defending or bringing any legal claims.

3.6 Third parties as assignees, transferees, or novatees

We may assign, transfer, or novate our rights or obligations to a third party, to the extent permitted under the terms and conditions of any contract between you and us. We may disclose or transfer your Personal Data to assignees, transferees, or novatees, including prospective assignees, transferees, or novatees, provided that these data recipients agree to treat your Personal Data in a manner consistent with this Privacy Policy.

3.7 Third parties connected with business transfer

We may disclose or transfer your Personal Data to our business partners, investors, significant shareholders, assignees, prospective assignees, transferees, or prospective transferees in the event of any reorganization, restructuring, merger, acquisition, sale, purchase, joint venture, assignment, dissolution or any similar event involving the transfer or other disposal of all or any

portion of our business, assets, or stock. If any of the above events occur, the data recipient will comply with this Privacy Policy to respect your Personal Data.

Corporate Client

We may have to share your Personal Data with other parties for the purposes set out in section 3 above, [such as, our affiliates within Asia Plus Group Holdings Group], our other business partners, third party service providers engaged by us. In some cases, we may share your Personal Data to any government authority, law enforcement agency, court, regulator, or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individual's personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues.

When we transfer Personal Data to the third parties, we will take steps to ensure the protection of your Personal Data, such as confidentiality arrangements or other appropriate security measures as required by law.

4. International transfers of your Personal Data

We may disclose or transfer your Personal Data to third parties or servers located overseas, and the destination countries may or may not have the same data protection standards as Thailand. We have taken steps and measures to ensure that your Personal Data is securely transferred, that the data recipients have suitable data protection standards in place, and that the transfer is lawful by relying on the derogations as permitted under the law.

5. How long do we keep your Personal Data

We retain your Personal Data for as long as is reasonably necessary to fulfil the purposes for which we have obtained it as set out in this Privacy Policy, and to comply with our legal and regulatory obligations. However, we may have to retain your Personal Data for longer duration, if required by applicable law.

6. Other important information about your Personal Data

6.1 Cookies and how they are used

If you visit our websites, we will gather certain information automatically from you by using Cookies. Cookies are tracking technologies that are used in analyzing trends, administering our websites, tracking users' movements around the websites, and remembering users' settings. Most Internet browsers allow you to control whether or not to accept Cookies. If you reject Cookies, your ability to use some or all of the features or areas of our websites may be limited.

6.2 Personal Data used by minors

[Our activities are not generally aimed at minors and we do not knowingly collect Personal Data from customers who are minors (those who have not reach the legal age (20 years of age or by marriage)) without their parental consent when it is required, or from quasi-incompetent persons and incompetent persons without their legal guardian's consent. If you are a minor, quasi-incompetent or incompetent person and wish to engage in a contractual relationship with us, you must obtain the consent from your parent or legal guardian prior to contacting us or providing us

with your Personal Data. If we learn that we have unintentionally collected Personal Data from any minor without parental consent when it is required, or from quasi-incompetent person or incompetent person without their legal guardians' consent, we will delete it immediately or continue to process such Personal Data if we can rely on other legal bases apart from consent.]

6.3 Personal Data related to third parties

If you provide the Personal Data of any third party [(such as your spouse and children, shareholders, directors, beneficiary, emergency contact, referral, and references)] to us, [e.g. their name, family name, email address, and telephone number], you should ensure that you have the authority to do so and to permit us to use the Personal Data in accordance with this Privacy Policy. You are also responsible for notifying the third party of this Privacy Policy and, if required, obtaining consent from the third party or rely on other legal basis.

7. Your rights with regard to your Personal Data

Subject to the applicable laws and exceptions thereto, you may have the following rights regarding your Personal Data:

- (a) **Access:** you may have the right to access or request a copy of the Personal Data we are processing about you;
- (b) **Data Portability:** you may have the right to obtain Personal Data hold about you, in a structured, electronic format, and to transmit this data to another data controller;
- (c) **Objection:** in some circumstances, you may have the right to object to how we process your Personal Data in certain activities which specified in this Policy;
- (d) **Deletion:** you may have the right to request that we delete, destroy, or de-identify your Personal Data that we process about you, e.g. if the data is no longer necessary for the purposes of processing;
- (e) **Restriction:** you may have the right to restrict our processing of your Personal Data if you believe such data to be inaccurate, that our processing is unlawful, or that we no longer need to process this data for a particular purpose;
- (f) **Rectification:** you may have the right to have Personal Data that is incomplete, inaccurate, misleading, or out-of-date rectified;
- (g) **Consent withdrawal:** you may have the right to withdraw consent that was given to us for the processing of your Personal Data, unless there are restrictions on the right to withdraw consent as required by the law, or a contract that benefits you; and
- (h) **Lodge a complaint:** you may have the right to lodge a complaint to the competent authority if you believe our processing of your Personal Data is unlawful or non-compliance with applicable data protection law.

8. Effective Date of Personal Data Protection Act, B.E 2562

At the time we publish this policy, provisions in chapter 2, 3, 5, 6, 7, and section 95 and section 96 of Personal Data Protection Act B.E 2562 has not yet been effective. Our policy will comply to those exceptions when they become legally effective.

9. Changes to this Privacy Policy

From time to time, we may change or update this Privacy Policy. We encourage you to read this Privacy Policy carefully and periodically revisit www.asiaplus.co.th to review any changes that may occur in accordance with the terms of this Privacy Policy. We will notify you or obtain your consent again if there are material changes to this Privacy Policy, or if we are required to do so by law.

10. Contacting Us

If you wish to contact us to exercise the rights relating to your Personal Data or if you have any queries or complaints about your Personal Data under this Privacy Policy, please contact us or our Data Protection Officer via the following avenues:

- (a) Asia Plus Group Holdings Group

Asia Plus Group Holdings Company Limited

175 Sathorn City Tower Building, 3/1 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120 Telephone : 0-2680-1111
e-mail : support@asiaplus.co.th or dpo@asiaplus.co.th

Asia Plus Securities Company Limited

175 Sathorn City Tower Building, 3/1 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120 Telephone : 0-2680-1000
e-mail : support@asiaplus.co.th or dpo@asiaplus.co.th

Asia Plus Advisory Company Limited

175 Sathorn City Tower Building, 11 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120 Telephone : 0-2680-4002-3
e-mail : ib@asiaplus.co.th or dpo@asiaplus.co.th

Asset Plus Fund Management Company Limited

175 Sathorn City Tower Building, 17 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120 Telephone : 0-2672-1111
e-mail : customercare@assetfund.co.th or dpo@assetfund.co.th

- (b) Data Protection Officer

DPO Committee

175 Sathorn City Tower Building, 3/1 Floor, South Sathorn Road, Tung Mahamek, Sathorn, Bangkok 10120 Telephone : 0-2680-1111
e-mail : support@asiaplus.co.th or dpo@asiaplus.co.th