

Effective on 1 December 2021

This Privacy Notice (this “**Notice**”) is issued by Krungsri Securities Public Company Limited (together, “**KSS**,” “**we**,” “**us**,” or “**our**”).

## A. How this Notice applies

This Notice is addressed to individuals with whom we interact and whose personal data we handle in the course of our contract to employment/total rewards and performance management/ payment of salary, compensation and benefits/ benefit management/employee relations and communications/organization development/ training and development/ scholarship awarding/ licensing and certification/ succession plan and talent management/work relationship, including our i) candidate for employment, (ii) employee including short-term employee, (iii) advisor, (iv) company director, (v) secondee, (vi) dual-hatted employee, (vii) junior associate, (viii) outsourced staff, (ix) contractor, (x) trainee, (xi) trainer and coordinator and (xii) any other individuals about whom we obtain personal data (e.g. family members, references, guarantors, beneficiaries, emergency contact persons, related persons, and etc.) (together, “you” or “your”).

## B. Changes of this Notice

This Notice may be amended or updated from time to time to reflect changes in our practices or policies with respect to the collection, use, disclosure and/or transfer of personal data, or changes in applicable laws. You will be notified adequately of any such changes. We also encourage you to read this Notice carefully, and to regularly check this company website [krungsrisecurities.com](http://krungsrisecurities.com) / Intranet KSS connect / KSS Share point to review any changes we might make to this Notice.

## C. How we collect, use, disclose and/or transfer and protect your personal data

The purpose of this Notice is to describe how we collect, use, disclose, and/or transfer your personal data. This Notice also tells you about your rights and choices with respect to your personal data as a data subject, and how you can reach us to get answers to your questions.

### 1. What personal data we collect

#### 1.1 Categories of personal data

“**Personal Data**” means any identified or identifiable information about you as listed below. If it is possible to combine any information with your Personal Data, or if other information is used to build a profile of an individual, we will treat such other information and combined information as Personal Data.

We may collect or obtain the following categories of information which may include your Personal Data, depending on the context of your interactions with us, and the type of data subject you are to us, as follows:

Category of Personal Data	Description and examples
<b>Name and initials</b>	<b>Your information you are known, addressed, or referred to</b> such as title, first name/initial, middle name/initial, last name, maiden name, aliases or previous names, signature.
<b>Personal characteristics</b>	<b>Personal details about you</b> such as age, date of birth, gender, height, weight, marital status, nationality, country of birth, citizenship, citizenship status, military details, leisure activities and interests, photographs, language skills, number of children, moving picture and/or voice recording in different formats such as video or live broadcast.
<b>Personal directory information</b>	<b>Your contact details</b> such as home postal address, delivery address, home telephone number, home facsimile number, personal electronic mail address, personal cellular, mobile or wireless number, social media profile/handle, business postal address, business telephone number, business facsimile number, business electronic mail address, business cellular, mobile or wireless number.

Category of Personal Data	Description and examples
<b>Education information</b>	<b>Your educational and professional information</b> such as degrees and schooling, licenses and professional membership, academic record.
<b>Employment information</b>	<b>Your employment details, status and history</b> such as occupation/title, position, function, employer identification number, job code, corporate held credit or debit card numbers, work permit status, name, number and membership period of existing provident fund, employment authorization details, reference and background checks, taxpayer identification number, workers compensation claims, employment records (including salary and benefits), recruitment date, length of service, work termination, assets in possession during employment, reviews (performance and potential review, competency assessment, functional knowledge and skills, leadership and behavioral assessment), use of technology - evaluation of the use of technology ( Internet, email, etc. ), and information about disciplinary records and compensation for loss
<b>Government issued identification numbers</b>	<b>A number or code given to you by competent authority to identify who you are</b> such as national identification number, taxpayer identification number, other government-issued identification number, driver's or operation's license number, national identifiers for professional licenses, government sponsored health or food plan identifier, passport number, foreign registration number.
<b>Financial details</b>	<b>Your financial information, status and history</b> such as information relating to background checks; financial institution account number, financial transaction history, credit history, banking details, investments, savings, insurance claim history, source of income, income, salary, service fees, other compensation, compulsory employee salary deductions, voluntary employee salary deductions, financial assistance (e.g. benefits, staff welfare, staff loan benefits, assistance, gifts, subsidies), your purchase history (e.g. products, rentals, returns), household income data.
<b>Views and opinions</b>	<b>Information about your view and opinion</b> such as your preference about our contract to employment/ training and development/ scholarship awarding/ licensing and certification/ work relationship or other information that you choose to send to us, comments, feedback, complaints, recommendations, survey responses, inquiries and any information you have volunteered during human resources related communications;

If you do not provide your Personal Data, it may mean that we cannot provide you with the job position you request, we cannot meet all our obligations with respect to contract to employment/ compensation management/ benefit management/ payment of salary, wage and benefits/ training and development, scholarship awarding, licensing and certification/ succession plan and talent management/ work relationship with you, or we cannot comply with our legal obligations.

We may collect **your sensitive data** such as criminal records, health data, and biometric information.

### **Personal Data of third parties**

If you give us Personal Data of other persons such as your mother's maiden name, spouse's information, family members' information, children's information, information of sponsors or dependents, information of the company's board members/ directors/ shareholders/ representatives/ chief managers, guarantor's information, beneficiary's information, or you ask us to disclose their Personal Data to third parties, you are responsible for notifying those other persons of the details of this Notice, including obtaining any required consent from such third parties (where consent is required). You must also ensure that we can lawfully collect, use, or disclose those persons' Personal Data as set out in this Notice.

### **Personal Data of minors, incompetent persons and quasi-incompetent persons**

If we need to obtain consent from data subjects who are minors or who cannot lawfully give consent by themselves, we will not collect their Data until the consent of the persons exercising parental power is obtained. In addition, we will not collect any Data from quasi-incompetent persons or incompetent persons until the consent of their legal curators and guardians is obtained (as the case may be).

If we have not acknowledged that the data subjects are minors, quasi-incompetent persons or incompetent persons prior to the collection of their personal data, upon learning that we have collected Personal Data of minors without the consent of persons exercising parental power (when it is required and the minors cannot lawfully give consent by themselves), or from quasi-incompetent persons and incompetent persons without the consent of their legal curator and guardian (as the case may be), we will delete the Personal Data at the earliest convenience unless we can rely on other legal bases apart from consent.

## **1.2 Collection of your Personal Data**

We may obtain your Personal Data directly from you or indirectly from other sources (e.g. publicly available sources), and/or through our affiliates (e.g. refer from other entities in Krungsri Group or MUFG Bank, Ltd. and its affiliates), recruitment service providers or platforms (including recruiters, headhunters, recruitment websites, social media platforms, event organizers) , business partners, or third parties (e.g. hospitals, universities, government entities, data companies, training and development service providers, competency assessment service providers, academic institutes, website of entities or professional associations that oversee the licensing and certification, survey/ engagement survey/ work relationship survey service providers).

## **2. On what basis and why we collect, use, or disclose your Personal Data**

### **2.1. Legal basis we may rely on**

We thrive to determine our legal basis for our collection, use or disclosure of your Personal Data, as appropriate. In most cases, the legal bases which we rely on are any of the followings:

<b>Legal basis</b>	<b>Description</b>
<b>Fulfilling contracts</b>	To allow us to perform actions that are necessary for entering into contract with you and/or for providing you with the benefits under the contract with you
<b>Our legal obligations</b>	To allow us to meet our legal obligations (for example, getting proof of your identity to meet our obligations under the applicable laws)
<b>Our legitimate interests</b>	To pursue our and other's legitimate interests (for example, to detect and prevent fraud)
<b>Vital interest</b>	To prevent or suppress a danger to a person's life, body or health
<b>Your consent</b>	To collect, use or disclose your Personal Data if your consent is required

## 2.2. The purposes for which we collect your Personal Data

We may collect, use, disclose and transfer your Personal Data collected for various purposes, depending on how you interact with us, what benefits you obtain from us, nature of our relationship with you and our Business Partner and/or any other considerations in each specific context, as described below.

Kindly note that all the purposes as listed below set out the general framework of our data usage practices and only the relevant purposes will be applicable to you.

Purposes	Description
<b>Pre-employment process</b>	To proceed with recruitment process (e.g. recruitment, selection, making hiring decisions, or checking reference in case of re-hiring and transfer between KSS BAY and subsidiaries); to process employment applications, interview, evaluate your application, eligibility, qualifications and performance; to conduct background checks and screening or to conduct professional license check whether you will be offered a position with us; to check your information against blacklist; to approve your application for the employment, to contact you in relation to the position you requested or applied for (e.g. whether your application is approved or rejected).
<b>Identity verification</b>	To conduct your identity and signatory verification when you apply for our contract of employment/work relationship or when we provide you with benefits; to authenticate your access and login credentials; to verify your location to allow access to your accounts.
<b>Employment and onboarding processes</b>	To process onboarding, execute employment contracts, specify employment details, arrange for orientation and provide employment certifications; to communicate and disseminate information to you; to contact with you and your emergency contact; to apply for work permits and visas; to administer leaves in compliance with our work rules; to conduct organizational development activities; to provide opportunities and activities for learning and development, scholarships, training, referral, and reporting; to process application and renewal for licenses and professional certificates; to provide access cards and credentials; to provide reference and recommendation; to evaluate your performance through performance reports, to manage on probation, promotion, secondment and staff rotation, talent and succession program, and disciplinary investigations, and etc.
<b>Provision of salary, compensation and benefits</b>	To manage, analyze and plan payroll, to generate salary figures, net income amount, to issue certificates, statements of provident fund, incentives, and rewards; to deduct compulsory and voluntary taxation and contributions; to process the registration/termination of social security fund members; to process insurance claims (including life, disability, accident, health, and travel insurance); to check the related parties transactions for loan approval; to enable employees to apply for and obtain benefits such as loans, accommodation allowance, annual health check-up, medical treatment, disaster benefit, child birth gift, and child's scholarships and etc.
<b>Transactions and/or payments processes</b>	To transfer funds, process payments, transactions, and fulfill orders; to conduct underwriting and loan approval, disbursement, collateral registration, settlement, reconciliation, repayment and closure activities for loans offered to you; to carry out debt collection and enforcement services, and deal with your account in a manner that is most appropriate to your individual circumstances for loans offered to you.

Purposes	Description
<b>Internal organization management and relationship maintenance</b>	To conduct data analysis, report and other data maintenance related activities; to provide facilities, tools and equipment; to follow up on complaints, claims, and survey; to update and maintain your data and related records; to maintain data accuracy and completeness; to provide IT systems and support, such as to provide access to our IT tools, systems and applications.
<b>Post-employment processes</b>	To process on off-boarding, to process post-employment services, certifications, cessation/termination of employment, exit interviews and ad hoc surveys; and transfer to new position in our affiliates.
<b>Protection of our interests</b>	To protect the security and integrity of our business; to exercise our rights or protect our interest where it is necessary and lawfully to do so; for example, to detect and prevent fraud, to respond to fraud claims, and to determine fraud risk and identify fraudulent transactions, intellectual property infringement claims, or violations of law; to manage and prevent loss of our assets and property; to perform sanction list checking, risk management, internal audits and records, asset management, systems, and other business controls; to prevent or suppress a danger to a person's life, body, or health; to secure the compliance of our terms and conditions; to follow up on incidents; to prevent and report criminal offences and to protect the security and integrity of our business; for reference and evidence related to claims or litigation.
<b>Carrying out legal obligations and compliance</b>	To fulfill legal obligations, legal proceedings, or government authorities' orders which may include orders from government authorities outside Thailand, and/or cooperate with court, regulators, government authorities, and law enforcement bodies when we reasonably believe that we are legally required to do so, and when disclosing your personal data is strictly necessary to fulfill the said legal obligations, proceedings, government orders, our and our affiliates' codes of conduct and internal policies; to exercise our rights or defend against legal claims; to maintain record keeping and resolve complaints and disputes; to perform compliance activities, regulatory and tax reporting.
<b>Security and system monitoring</b>	To authenticate and control access and logs where applicable; to monitor systems, devices and Internet connection; ensuring IT security; to prevent and solve crimes; and undertake risk management and fraud prevention.
<b>Corporate transactions</b>	In the event of sale, transfer, merger, reorganization, or similar event, to disclose and transfer your Personal Data to one or more third parties as part of that transaction.

## 2.3 Sensitive data

We will only collect, use, or disclose sensitive data on the basis of your explicit consent, for establishment, defense, compliance or exercise of legal claims, fulfillment of legal obligations for significant public interests, or otherwise as permitted by law. Where consent is required, we will separately ask for your consent via the appropriate methods.

Sensitive categories of Personal Data	Purposes
<b>Criminal records</b>	To collect and use your criminal records for recruitment consideration, background screening/ checking, and investigation.
<b>Health data</b>	<ul style="list-style-type: none"> <li>We may collect and use your health data for execution of contract, management of leave record, payroll and benefits, training and development, scholarship awarding.</li> <li>Your health data we collect about you may include medical record number, health plan beneficiary number, device identifiers and serial numbers, medical treatment, medical diagnosis, medical history, information related to medical payment, medical claims data, medical images and metadata, Rx / prescription number, health insurance identification or account number, drugs, therapies, or medical products or equipment used, physical health data, mental health data, genetic test results or information, family health or morbidity history, and annual physical check-up result.</li> </ul>
<b>Biometric Information</b>	We may collect information about your face image data for using in Face Scan

## 3. Who we disclose your Personal Data to

We may disclose your Personal Data to the following parties for the purposes as described in section 2 above, depending on the context of your relationship with us and the nature services you obtain from us:

Category of recipients	Descriptions
<b>Affiliates</b>	We may disclose your Personal Data to other members of Krungsri Group, including our financial group companies and our affiliates, and MUFG Bank, Ltd. and its affiliates which are located in Thailand and other countries, including but not limited to Japan, Singapore, the United States of America and the United Kingdom.
<b>Service providers</b>	<p>We may engage other companies to provide services for us and to support us in our employment contract/ compensation management/ benefit management/ payment of salary, wage and benefits/ training and development/ scholarship awarding/ licensing and certification/ competency assessment/ employee engagement activities / work relationship operation. We may disclose your Personal Data to these service providers, or they may collect your Personal Data on our behalf, for various business purposes, including human resources services.</p> <p>For example, we engage and outsource some of our business functions to infrastructure, software, and website development and IT service providers; data storage and cloud service providers; recruitment agencies and outsourced HR service providers; research agencies; domestic and international training and development service providers; competency assessment service provider; licensing and professional certification training</p>

Category of recipients	Descriptions
	service providers; survey agencies; VISA agents; card manufacturing service providers; plate award manufacturing service providers; payment service providers; payment networking service providers; research agencies; employee survey or engagement survey service providers, marketing agencies; email sending service providers; SMS sending service providers; social networking service companies; analytics service providers; administrative and business support service providers; document storage and destruction service providers; document delivery service providers; printing service providers; data entry service providers, tax service providers, visa and work permit service providers, etc.
<b>Professional advisors</b>	We may disclose your Personal Data to professional advisors relating to audit, legal, accounting, and tax services who assist in running our business and defending or bringing any legal claims, initiating and managing auction or taking legal actions.
<b>Companies we partner with</b>	We may disclose your Personal Data to companies that we have partnered with to offer or enhance our human resources services to you (e.g. hospitals, insurance companies and brokers, accommodation agents and hotels, and event organizers).
<b>Association or institutions</b>	We may disclose your Personal Data to associations or institutions such, Thai Bankers' Association, the associations or institutions that oversee the licensing and professional certification, etc.
<b>Third parties with whom you authorize or direct us to share your Personal Data</b>	We may disclose your Personal Data with your consent or at your direction.
<b>Third parties such as assignees, transferees, or novatees</b>	We may assign, transfer, or novate our rights or obligations to a third party, to the extent permitted under an agreement between you and us. We may disclose or transfer your Personal Data to assignees, transferees, or novatees, including prospective assignees, transferees, or novatees,
<b>Third parties connected with corporate transactions</b>	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, debt 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.
<b>Government entities and others with whom we disclose Personal Data for legal or necessary purposes</b>	We may disclose your Personal Data to government entities or regulatory bodies (e.g. the Bank of Thailand, the Office of Securities and Exchange Commission, the Office of Insurance Commission, the Thai Financial Market Committee (TFMC), the Land Department, Ministry of Labour, the Royal Thai Police, the Revenue Department, the Legal Execution Department, and courts), the Immigration Office, the Social Security Office, the Workmen's Compensation Fund, Department of Skill Development and others for legal, regulatory and other necessary purposes. This includes responding to requests from regulators or government authorities for purposes of law enforcement, legal orders, audits, or legal processes/claims.

Category of recipients	Descriptions
<b>Other categories of data recipients</b>	Companies, financial institutions, educational institutions with whom we have not partnered who seek your personal information from us for reference where you have given your consent or based on other legal basis.

#### 4. Transfer of your Personal Data to other countries (if any)

We may need to disclose or transfer your Personal Data to third party located overseas for achieving our business purposes or for your benefits, including other overseas financial institutions for secondment and staff rotation, e.g. Japan, Australia, Singapore, the United States of America, and the United Kingdom. We may also need to store your Personal Data in servers located outside Thailand. Some recipients of your Personal Data are located in another country for which the Personal Data Protection Committee under the Thai Personal Data Protection Act B.E. 2562 has not ruled that this country has adequate data protection standard.

When it is necessary for us to transfer your Personal Data to a third country with a level of data protection standards not equivalent to Thailand, we will ensure that an adequate degree of protection is afforded to the transferred Personal Data, or the transfer is otherwise permitted in accordance with the applicable data protection law. We may, for example, obtain contractual assurances from any third party given access to the transferred Personal Data that such data will be protected by data protection standards which are equivalent to those required in Thailand.

#### 5. How long we will store your personal information

We will store your Personal Data for as long as it is necessary for the purposes for which it was collected, as explained in this Notice and in accordance with the applicable data protection law. However, we may retain your Personal Data for a longer period in order to comply with applicable laws and regulations and our internal policy or with regard to our operational requirements, such as proper account maintenance, facilitating customer relationship management, and responding to legal claims or regulatory requests.

#### 6. Your rights

Subject to the applicable data protection laws in Thailand, you may have a number of rights regarding the collection, use, disclosure and/or transfer of your Personal Data, including:

- (1) **to access:** you can access and obtain a copy of information relating to the collection, use, disclosure and/or transfer of your personal data, and a copy of your personal data, or request that we disclose the acquisition of your personal data without your consent;
- (2) **to rectify:** where you consider that your personal data is inaccurate, not up-to-date, or incomplete, you can require that such Personal Data be modified accordingly;
- (3) **to erase or destroy:** you can request the deletion, destruction, or anonymization of your personal data to the extent permitted by law;
- (4) **to restrict:** you can request the restriction of the use of your personal data, for example in the case you found that your personal data is inaccurate, you can request to restrict the use of such data until it is modified;
- (5) **to object:** You have the right to object to the collection, use, or disclosure of your personal data including for direct marketing purposes in any case, which covers profiling related to such direct marketing;



- (6) **to withdraw your consent:** where you have given your consent for the collection, use, or disclosure of personal data, you have the right to withdraw your consent at any time;
- (7) **to data portability:** where legally applicable, you have the right to request us to provide your personal data in a structure, commonly used and machine-readable format using tools or devices which function automatically and by which personal data can be used and disclosed in automatic mode; and transmit or transfer your personal data in such format to another organization; and
- (8) **to lodge complaints in case you notice that we do not comply with the data protection laws:** you are entitled to lodge a complaint with the competent authority regarding the collection, use, and/or disclosure of your personal data by us or on our behalf. Before approaching the competent authority, we would, however, appreciate the chance to deal with your concerns, so please contact us in the first instance.

To exercise any of these rights in this section, you may contact us at the address in “Contact us” section.

Your request for exercising any of the above rights may be limited by the applicable laws. There may be certain cases where we can reasonably and lawfully decline your request, for example, due to our legal obligation or court order.

## 7. Contact us

If you have any questions, comments, or concerns about our privacy practices or, if you would like to submit a request based on a right listed in this Notice, please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

### **Contract out Data Protection Officer:**

Name-Surname : Ms. Ratchadaporn Sookying

Contact email : [ratchadaporn.sookying@krungsrisecurities.com](mailto:ratchadaporn.sookying@krungsrisecurities.com)

Telephone number : 02 659 7000 # 5904

### **Contact us:**

Address : The Krungsri Securities Public Company Limited (Head office)

898 Ploenchit Tower, 3<sup>rd</sup> Floor, Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330 Thailand

Contact e-mail : [DPO.HR@krungsrisecurities.com](mailto:DPO.HR@krungsrisecurities.com)

Telephone number : 02 659 7000