## Privacy notice for customer AIRA & AIFUL Public Company Limited

AIRA & AIFUL Public Company Limited ("the Company") is aware of the privacy rights of third parties who contact or have business relationships with the Company. Therefore, this Privacy notice is provided to inform you of the collecting, using and disclosure of personal data of natural persons which is in accordance with the Personal Data Protection Act B.E. 2562 ("Personal Data Protection Act") and other relevant laws or regulations.

This privacy notice will inform you of the collection, use or disclosure of your personal data, the type of data, the purposes of processing, data retention period, disclosure of personal data to third parties, your rights, as well as the confidentiality and security of your personal data and contact channels.

# 1. Who does this notice apply to? and sources of personal data

1.1 This privacy notice applies to customers ("you") in case of the following condition (one condition or many conditions)

- Applying for loan and/or service of the Company.
- Contacting for inquiries about credit and/or services information through various channels of the Company.
- Being offered, invited or informed about applying loans and/or services through the Company's various channels.
- Being refused to apply for credit and/or services of the Company, and the Company is still keeping your personal data.

### 1.2 Sources of personal data

The Company may collect your personal data from various sources including:

| Sources  | Example  |  |
|--|--|--|
| 1) Directly received<br>from customer<br>(You) | <ul> <li>The process of applying for services or loans of the<br/>Company, KYC process, signing in contract.</li> <li>Filling in forms, questionnaires, registration forms,</li> </ul>                                 |  |
|  | <ul> <li>or procedures for submitting claims or request.</li> <li>Contacting through various channels such as telephone, e-mail, social media accounts of the company, business cards, meetings, trainings,</li> </ul> |  |

| Sources                           | Example  |
|-----------------------------------|--|
|                                   | <ul> <li>seminars, events, marketing activities, meetings or<br/>any other channels, etc.</li> <li>Automatic storage of data such as when you access<br/>the Company's website or A Money application etc.</li> </ul>  |
| 2) Received from<br>other sources | <ul> <li>Customers, agents or service providers of the Company.</li> <li>Government agencies or other public sources such as company's websites, searchable information on the Internet or on various social media platforms such as Facebook, Instagram, YouTube, etc.</li> </ul> |

#### 2. Personal data that the Company collects, uses or discloses

2.1 What is personal data?

Personal data means any information relating to an individual from which an individual can be identified either directly or indirectly but does not include the information of the deceased.

2.2 Personal data that the Company collects, uses or discloses

The Company collects various types of personal data including the following.

| Type of data     | Sample  |
|------------------|---|
| 1) Personal data | <ul> <li>Name title, first name, middle name, last name, nickname (if any)</li> <li>A photograph, face image, or physical appearance.</li> <li>Gender, date of birth, age.</li> <li>Marital status, family status, Number of family members and number of children.</li> <li>Nationality, country of residence.</li> <li>Signature</li> <li>Information on documents issued by government agencies (such as a copy of ID card, Copy of passport, Copy of house registration or documents used for identification</li> </ul> |

| Type of data                         | Sample   |
|--------------------------------------|--|
|                                      | <ul> <li>Data for Know your customer (KYC) and Data for<br/>Customer Due Diligence (CDD)</li> </ul>  |
| 2) Education and<br>work information | <ul> <li>Education</li> <li>Occupation and field of occupation.</li> <li>Job position</li> <li>Work experiences, job detail.</li> <li>Workplace information such as company name, address, telephone number, number of employees etc.</li> </ul>   |
| 3) Contact<br>information            | <ul> <li>Current address, address in important documents<br/>and address of hometown country, workplace.</li> <li>Phone number, mobile phone number, fax number,<br/>e-mail address.</li> <li>Convenient time to contact</li> <li>Your name or account for electronic<br/>communications or social media (such as LINE ID,<br/>Facebook account if you contact via the Company's<br/>Facebook page).</li> </ul>  |
| 4) Financial<br>information          | <ul> <li>Bank account number</li> <li>A money card number</li> <li>Monthly income, salary date or other proof of income.</li> <li>Credit Score, card credit limit, reward points, approved credit limit, loan information, loan balance, payment history<sup>1</sup></li> <li>Transaction history, transaction details, Information in transaction memos, transaction reference number, transaction channel.</li> <li>A money application username and password</li> <li>Other information related to the use of the Company's credit / services (such as customer no./customer identification number, credit limit, interest rate, currency, information for applying loan, etc.</li> </ul> |

| Type of data  | Sample  |
|---|---|
| 5) Geographical<br>Data and<br>Technical<br>information,<br>equipment,<br>software or tools | <ul> <li>A Money application usage data</li> <li>Computer serial number (IP address or Mac address)</li> <li>Cookies ID</li> <li>Location Data</li> <li>Device model and type, network, connection information.</li> <li>Log</li> <li>Login information, access period, usage duration of the application and website, search history, browsing data.</li> <li>Browser plug-in type and version, operating system and platform including other technologies on the device you use to access the platform.</li> <li>Other technical information in using on the platform and operating system, etc.</li> </ul> |
| 6) Sensitive personal<br>data   | • For example, biological information for use in face recognition systems with your consent or as required by law.  |
| 7) Other<br>information   | <ul> <li>Record of any communication or interaction<br/>between you and the Company, details of<br/>complaints or comments, any exercise right request,<br/>opinion survey results, audio recordings,<br/>photographs, motion pictures, audio clip,<br/>communication records via Log/Chat - Bot share<br/>screen, images or video clips from closed-circuit<br/>television (CCTV) camera and any other information<br/>that is considered as personal data under Personal<br/>Data Protection Act.</li> <li>Registration information for attending company's<br/>activities, etc.</li> </ul>                 |

If you do not provide your personal data to the Company, the Company may not be able to offer you credits, products or services upon your request. In addition, the Company may not be able to perform all duties under the loan agreement, A-money application service, managing your benefits and/or your relation as Company's customer, relationship to provide credit, product or service to you or unable to perform the Company's obligations under the laws.

### **3.** Personal data of Third Party

If you provide personal data of another person to the Company, such as reference information, spouse Information, information about family members, information about children, patrons, dependents, information about the guarantor, information about the beneficiary or you may request the Company to disclose personal data of such persons to vendors or others.

You are responsible for notifying the details of this notice to such persons, as well as obtaining consent from such third parties (in case the consent is required). In addition, you are obligated to perform the duty of enabling the Company to collect, use or disclose personal data of those persons in accordance with the law as stated in this notice.

### 4. Purpose for collecting, using or disclosing personal data

| Purpose for collecting, using or disclosing personal data   | Lawful Basis   |
|---|--|
| <ol> <li>For consideration and approval of the Company's<br/>credit or service</li> </ol>   | <ul> <li>Fulfillment of<br/>contracts or<br/>processing of<br/>requests prior the<br/>contracting</li> </ul> |
| <ol> <li>For identity verification and verification (KYC) in<br/>the purpose of verifying customer identity and<br/>Customer Due Diligence process (CDD)</li> </ol>                 | <ul><li>Consent</li><li>Comply with the law</li><li>Legitimate Interest</li></ul>                            |
| <ol> <li>For using company's services, compliance with<br/>the Company's internal processes, receiving or<br/>sending documents between the customer and<br/>the company</li> </ol> | Comply with contract   |
| <ol> <li>In the purpose of evaluating, improving and<br/>developing products, services and various<br/>promotional programs of the Company</li> </ol>                               | Consent  |

The Company will collect your personal data as necessary for the following purposes

| Purpose for collecting, using or disclosing personal data   | Lawful Basis   |
|---|--|
| 5) To comply with legal obligations and law<br>enforcement including data reporting to<br>government agencies under the law such as the<br>Bank of Thailand, the Revenue Department or in<br>case of receiving any summons, arrest warrant<br>from police office, government or court | • Comply with the law  |
| <ul> <li>6) For the establishment of legal claims,<br/>compliance/exercise of legal claims or raising the<br/>defense of legal claims</li> </ul>  | <ul><li>Comply with contract</li><li>Comply with the law</li></ul>                             |
| <ol> <li>For carrying out business planning, reporting and<br/>forecasting</li> </ol>   | Consent  |
| <ol> <li>To manage risk, prevent and investigate<br/>fraudulent, money laundering, financial terrorist<br/>or any other unlawful action</li> </ol>  | <ul><li>Comply with contract</li><li>Comply with the law</li></ul>                             |
| 9) For debt collection  | <ul><li>Comply with contract</li><li>Comply with the law</li><li>Legitimate Interest</li></ul> |
| 10) For rights, duties transfer and any benefits<br>under the contract between the customer and<br>the company including the transfer or debt<br>selling, transfer due to the conversion of assets<br>or securities which has been done lawfully                                      | Comply with contract   |
| 11) For security purposes in headquarters, branch<br>offices or the company's premises including the<br>accession of office space and taking pictures of<br>those who come in contact by themselves with<br>CCTV  | Lawful benefit   |
| 12) To maintain relationship with the Company's customers, such as handling complaints, offering benefits without marketing objectives  | <ul><li>Comply with the terms of the contract</li><li>Agree</li></ul>                          |
| <ol> <li>For analysis, research and development of the<br/>Company's products and services to suit your<br/>needs</li> </ol>  | Consent  |
| 14) For analyzing the history of spending or using the service and your interests, to enhance the   | Consent  |

| Purpose for collecting, using or disclosing personal data  | Lawful Basis  |
|--|---|
| benefits and offerings of the Company's existing and future products or services   |   |
| 15) To support IT regarding the company's services<br>such as Website system, A money Mobile<br>Application, etc, and organizing the access of any<br>system that you have a right to access, including<br>cancellation of inactive account.                               | <ul> <li>Comply with the terms of the contract</li> <li>Legitimate Interest</li> </ul>  |
| <ul> <li>16) To notify news, benefits, and various<br/>promotional programs for marketing purposes.</li> <li>Invitation to join the event, notifying information<br/>about products or services, including various<br/>notifications without marketing purposes</li> </ul> | • Consent   |
| 17) For disclosure to agents,<br>contractors/subcontractors, consultants/experts<br>and service providers for any operations   | <ul> <li>Comply with the terms of the contract or processing of requests before getting into a contract procedure</li> <li>Consent</li> </ul> |

### 5. Personal data retention period

The Company will retain your personal data for as long as is necessary for the purposes of collecting, using, disclosing, or processing personal data set forth in this notice. The criteria used to determine the retention period are: the relationship between you and the company, the company will retain your personal data for duration of using credit, product or service. And the company may continue to retain personal data for the period necessary to comply with the law or in accordance with the legal retention period or to establish legal claims for compliance or to file legal claims or to raise as defenses for the legal claims or for other reasons according to the company's internal policies and regulations.

### 6. Disclosure data

To carry out the purposes stated in this notice company may disclose your information to third parties as follows:

| Person who receiving             | Detail   |
|----------------------------------|--|
| personal data                    |  |
| 1) Company service<br>provider   | <ul> <li>The Company may use services from other companies, partners, or other service providers that supporting and providing credit, products, or services to you. Therefore, company may disclose your personal data to its service providers, including but not limited to;</li> <li>Digital identity verification service provider</li> </ul>   |
|                                  | <ul> <li>(National Digital ID)</li> <li>Cellular carriers and messaging services (SMS)</li> <li>Payment gateway service providers</li> <li>Debt collection, debt restructuring and prosecution service provider</li> <li>Information technology, technology support and</li> </ul>   |
|                                  | <ul> <li>technology security service providers</li> <li>Cloud Computing service providers</li> <li>Marketing service providers</li> <li>Archiving service providers</li> <li>Social media service providers</li> <li>Publisher or printing service providers</li> <li>Card issue service providers</li> <li>Document, card, parcel delivery service providers</li> <li>Card or document destruction service providers</li> </ul> |
|                                  | etc.   |
| 2) Agencies as<br>require by law | The Company may have to disclose your personal data<br>in order to comply with the order of an authorized or<br>legal authority and/or to comply with the law, which<br>recipients of your personal data included;   |
|                                  | <ul> <li>Government agencies, Law enforcement agencies, or a regulatory authority (e.g., Bank of Thailand, Anti-Money Laundering Office, Revenue Department, Courts, Police Officers, Securities and Exchange Commission, etc.)</li> <li>Associations, agencies, or any other person as necessary to comply with legal obligations. or compliance with the law</li> </ul>  |

| Person who receiving       | Detail   |
|----------------------------|--|
| personal data              |  |
| 3) Consultants/<br>Experts | <ul> <li>For the benefit and necessity of business operations, the Company may disclose your personal data to the following persons:</li> <li>Auditor</li> <li>External auditor</li> <li>Legal advisor</li> <li>Other consultants or experts, as deem appropriate</li> </ul>   |
| 4) Other outsiders         | <ul> <li>To fulfill the objectives specified in this announcement, the Company may disclose your personal data to other third parties who receive your personal data, including but not limited to;</li> <li>Persons whom you have contract or relationship (e.g., referrals, guarantors, etc.)</li> <li>National Credit Bureau Co., Ltd.</li> <li>Developers of infrastructure technology and/or company systems</li> <li>Assignee of any rights, duties, and benefits from the Company, including those assigned by the transferee to act on his/her behalf, for example in the case of organizational restructuring, mergers or acquisitions, asset transfers, debt transfers or sales. securitization, etc.</li> <li>Banks or other financial institutions that provide functionality in connection with the Company's products or services (e.g., withdrawing money from ATMs or paying off debts through banks or other financial institutions, etc.)</li> <li>Members of digital identity verification service providers (National Digital ID)</li> <li>Social Media Service Providers</li> <li>The public or person, etc.</li> </ul> |

The Company may need to transfer your personal data to third parties located in foreign countries such as Japan, Australia, etc. as part of the Company's normal business operations, such as sending or transferring personal data to cloud platforms or servers located abroad.

When it is necessary for the Company to transfer your personal data to third country which has standards for personal data protection not comparable to Thailand. The Company will take steps to provide adequate personal data protection measures for personal data transferred, or in order for the transfer to be carried out in accordance with applicable personal data protection laws, for example, the Company may request that third parties granted access to the personal data that have been transferred, agree with the Company to certify that the data will be protected in accordance with personal data protection standards that are equivalent to those in Thailand.

### 8. Use of cookies

The Company may collect and use cookies and similar technologies when you use our products and/or services including the use of the website and A Money application.

The collection of cookies and similar technologies will allow the Company to recognize you, know your preferences and improve the way the Company offers products and/or services to you. Please see details in Notice on the use and management of cookies (Cookies Notice) https://www.amoney.co.th/privacy/cookie\_consent and <u>http://www.aira-aiful.co.th/?page\_id=1739</u>

# 9. Collection and use of personal data for the original purpose

The company has the right to collect and use your personal data as the company has collected before the date the Personal Data Protection Act B.E. 2562 continues to come into force for the original purpose. You may at any time withdraw your consent to the collection and use of your personal data for the original purpose. (please see details in the section on **Rights of Data Subject**)

## **10.** Rights of Data Subject

10.1 You have rights under the Personal Data Protection Act to do the following:

- (1) Right to withdraw consent : You have the right to withdraw your consent to the collection, use or disclosure of personal data that you have given us your consent to at any time during the period that such personal data is with the Company.
- (2) Right to access to personal data : You have the right to access your personal data and request the Company to make a copy of such personal data for yourself, including request the Company to disclose the acquisition of personal data that you did not give consent to the Company.
- (3) Right to rectification of personal data : You have the right to request the Company to correct personal data to be accurate, update, complete and not misleading.
- (4) Right to erasure : You have the right to request the company to delete or destroy or make the personal data non-personally identifiable for some reason.
- (5) Right to restriction : You have the right to suspend the use of your personal data for some reason.
- (6) Right to transfer : You have the right to request the transfer of your personal data that you have provided to the Company to another data controller or yourself for some reason.
- (7) Right to object : You have the right to object to the collection, use or disclosure of your personal data for some reason.

### 10.2 How to exercise your rights

You can exercise the above rights as data subject at A money Mobile Application, the Company's website, the Branches or send a letter via the postal address of the Company with the following documents.

- 1) Exercise rights request form with a signature (You can download such documents through the Company's website)
- 2) Copy of ID card with signature certifying true copy.

However, if the Company refuses to exercise your rights, the Company will inform you of the reason for the refusal.

### 10.3 Processing period

The company will process your request to exercise your rights within 30 days after receiving the complete exercise request form with complete supporting documents. During the aforementioned operation, your personal data stored in the Company's database will not be changed in any way and may still be collected, used and/or disclosed.

## **11.** Measures for the security of personal data

11.1 The Company will provide appropriate security measures in order to prevent unauthorized or improperly access, use, change, correct, loss, destruction or disclosure of personal data.

11.2 If the company discloses personal data to a data processor, the Company will supervise other persons entrusted by the Company to process personal data as instructed or on behalf of the Company appropriately and in accordance with the law.

### **12.** Contact information

In case of doubt or wanting more information about the protection of your personal data, Collection, use or disclosure of your data, exercise of your rights or have any complaints, you can contact the company as follows:

AIRA & AIFUL Public Company Limited and Data protection offer (Mr. Yuji Fukada)

Address: 90 CW Tower, Floor 33,34, Room No. B 3301-2, B 3401-2, Ratchadaphisek Road, Huai Khwang Sub-district, Huai Khwang District, Bangkok 10310

Tel: 0-2117-5000

### E-mail: DPOoffice@aira-aiful.co.th

In this regard, you have the right to complain to the relevant Personal Data Protection Committee when the Company violates or fails to comply with the Personal Data Protection Act including rules or other announcements issued under the said Act.

### **13.** Amendments to the Privacy notice

The Company may from time-to-time review and may amend this notice as appropriate to ensure that your personal data is properly protected. If this notice is amended, the Company will notify you through the website or by other appropriate methods.

Latest updated in February 2023