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## **Privacy Policy for Shareholders, Debenture Holders, and Directors of Asia Plus Group Holdings Public Company Limited and its Group Companies**

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**Asia Plus Group Holdings Public Company Limited** and its group companies (altogether referred to as "the Company", "we", "us", or "our") which are the following entities:

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

respect the rights to the privacy of our shareholders, debenture holders, and directors ("you", "your"). To ensure that your Personal Data is protected, the Company issues this privacy policy to describe the process on how we collect, use, disclose your Personal Data (these are called "process") and inform you about the purpose of the Personal Data processing, the Personal Data retention period, and your rights as the Data Subject. For your complete understanding on the implication of the Personal Data Protection Laws, please read the provisions of this Privacy Policy.

### **1. Definitions**

<b>"Shareholders"</b>	means	shareholders of the Company
<b>"Debenture holders"</b>	means	debenture holders of the Company
<b>"Directors"</b>	means	directors of the Company
<b>"Personal Data Protection Laws"</b>	means	any laws, regulations and other legal requirements including but not limited to the Personal Data Protection Act B.E.2562 (2019) and secondary legislation, notifications, announcements, official practice guidelines and interpretation which were forced with the Personal Data processing (as amendment or replacement)
<b>"Personal Data"</b>	means	any identified or identifiable information about you as prescribed by the Personal Data Protection Law. The Company might collect your information in a variety of ways. We may collect your Personal Data directly from you (e.g. filling in forms) or indirectly from various sources (e.g. government authorities and/or relevant regulators)
<b>"Sensitive Data"</b>	means	Personal Data classified by law as Sensitive Personal Data.

### **2. Personal Data we collect**

The Company will process your Personal Data including your Sensitive Data, your grantee or proxy holder (if any) as follows;

2.1 Directors: the Company will collect the following Personal Data about directors and nominated persons:

- 1) In recruitment process, the Company will collect Personal Data from personal identification card or other documents issued by the government which can be used to verify your identity such as title, name, last name, gender, personal identification number, passport number, picture, address, date of birth, nationality, place of birth, height, telephone number, fax number, e-mail address, educational background, working experience, shareholding information, lawsuit record, criminal record, information on direct and indirect interest of the directors towards the Company, and the information relating to the spouse and minor or adopted minor such as name, last name, date of birth, age, address, shareholding information, etc.

2) For person who has been appointed as director, the Company may collect additional Personal Data as follows;

- Marital status, information relating to spouse or person who live together as husband and wife, child, father, mother, sibling;
- Educational background, training record, occupation, working experience, director seat in other companies of yourself and related persons, shareholding information in other company of yourself and related persons;
- Director's remuneration, bank account number, tax identification number;
- Information of the related persons such as information of personal secretary or assistance (name, last name, e-mail address, telephone number);
- Voice records, phone records, CCTV records, username and password, IP address / Log file, in case of contacting and/or attending onsite or online meeting with the Company;
- Information from attending the seminars, activities, board of directors' meetings, sub-committees meetings or shareholders meeting;
- Information of shareholding, portfolio account numbers, director's performance records, and other information specified by the applicable laws or corporate governance rules;
- Information in the form that the Company has to submit to the government agencies, regulators, other organizations which control/dominate the Company such as Form 35-E1: information with representation and warranty of the company's director and executive and their consent, application form for obtaining approval to be personnel in the capital market business, etc;
- In case that the Company may need to collect and process the Sensitive Data such as blood type, religion, health information, food allergy, drug allergy in order to arrange the meeting, seminar or activity, the Company will request your explicit consent on a case-by case basis;

## 2.2 Individual shareholders and debenture holders (natural person)

- 1) Personal information: title, name, last name, address, telephone number, fax number, signature, e-mail address, nationality, occupation, date of birth, tax identification number, personal identification number, passport number (in case of foreigner), etc;
- 2) Shareholding in the Company: number of shares held, shareholder registration number, transferring shares, accepting transfer of the shares, inheritor, statutory heir or statutory agent, etc;
- 3) Bank account information for receiving dividend;
- 4) Information of the proxy holder to attend the shareholders' meeting such as name, address, personal identification number, telephone number, e-mail address, etc;
- 5) Voice records, phone records, CCTV records, username and password, IP address / Log file, in case of contacting and/or attending onsite or online meeting with the Company;
- 6) Information on exercising the legal rights of shareholders/debenture holders in the shareholders' meeting or debenture holders' meeting;
- 7) Personal Data of the related persons of the shareholders or debenture holders such as spouse, child, beneficiary owner, contact person, reference person and/or other person who related with your shareholding;
- 8) The information in the form that the Company has to send to the government agencies, regulators or other organizations which control/dominate the Company such as book of shareholders' registration;

## 2.3 Shareholder and debenture holder who is juristic person, the Company may process the Personal Data of the representative of such juristic person.

- 1) Director information which is shown on the company registration certificates, the list of shareholders registration or any documents which hold the Personal Data of the representative of juristic person;
- 2) Other information which the Company may request from the representative of the juristic person for attending the meeting or any concerned action;

In case that you provide the Personal Data of any third party to the Company, you acknowledge that you have a duty under the Personal Data Protection Law in notifying the third party of such disclosure to the Company.

Your or third party's identity verification documents which were provided to the Company such as copy of personal identification card or any document issued by government authorities may contain Sensitive Data such as race, blood type, religion which are not required by the Company, these data can be redacted by you. If you did not redact such data, the Company will consider to redact such data for the protection of the Personal Data.

### 3. The way we collect the Personal Data

- 3.1 The Company will directly collect the Personal Data from the director and the nominated person to be the director, including from government authorities, and relevant regulators.
- 3.2 The Company will collect Personal Data of a shareholder, debenture holder, attorney, or proxy when you subscribe to our shares or debentures or become a shareholder or debenture holder. The Company will collect the data directly from you or through a securities broker or registrar, etc.
- 3.3 When you contact the Company or exercise your rights as shareholder or director of the Company.
- 3.4 When you participate in any of the Company's activities, the Company may collect additional Personal Data.
- 3.5 If the Company needs to process the Sensitive Data, we will request for your explicit consent on a case-by-case basis.

### 4. Purposes and legal basis for processing your Personal Data

The Company may process your Personal Data by relying on the following legal basis: 1) contractual basis; 2) legal obligation; 3) legitimate interest of the Company and third parties; 4) vital interest, for preventing or suppressing danger to a person's life, body or health; and 5) consent basis for the case that does not meet the legal basis in 1) to 4).

The Company relies on the legal basis above for the following purposes of processing your Personal Data as follows;

#### 4.1 Shareholders / debenture holders

Purposes of Personal Data Processing	Legal basis
<ul style="list-style-type: none"> <li>To attend shareholders' meeting or debenture holders' meeting</li> <li>To exercise your rights as a shareholder or debenture holder or proxy in voting or appointing proxies</li> <li>To register the Company's shareholders or debenture holders registration book as well as store and keep the information up to date</li> <li>To pay the dividend, interest or coupon payments</li> <li>To enter into the contract or to fulfill the contractual obligations made between you and the Company such as share purchase agreement or bond representative agreement or capital payback contract, etc</li> <li>To communicate with you about information relating to shareholders, including letters to shareholders, notice to call for meeting, announcement and information about dividend payment, minutes of the meeting, including the annual general meeting of shareholders, and other extraordinary general meetings to be held from time to time, etc</li> <li>To provide your Personal Data to authorized person, including securities registrar, for the benefit of managing your shareholding on behalf of the Company</li> <li>To comply with the applicable laws and regulations</li> <li>To verify and collect evidence of identity verification documents</li> </ul>	<ul style="list-style-type: none"> <li>Contractual basis</li> <li>Legal obligation basis</li> </ul>
<ul style="list-style-type: none"> <li>To collect the health information and food allergy data of shareholders or debenture holders who are interested in attending the meeting or joining the Company's activities</li> <li>To use for public relations activities of the Company</li> </ul>	<ul style="list-style-type: none"> <li>Consent basis</li> </ul>
<ul style="list-style-type: none"> <li>For internal and external audit purposes and efficient business management of the Company</li> <li>To comply with regulations and investigate the business of the Company (Including the Company, group companies and external agencies)</li> <li>To organize activities for shareholders to participate such as a company visit</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest basis</li> </ul>

Purposes of Personal Data Processing	Legal basis
<ul style="list-style-type: none"> <li>To manage the Company's safety, such as CCTV recording inside and around the Company's areas where your image is captured, or your voice is recorded or identity card exchange for an access pass</li> <li>To record images, audio and video during the meeting for the benefit of broadcasting the meeting via the Company's website and other communication channels or for the benefit of the attendees</li> <li>To store documents for audit or as reference for the regulators, or to exercise legal rights of the Company</li> <li>To prepare audit reports, summaries of amendments, and internal prevention guidelines</li> <li>To create username on Company's website, application, or IT systems.</li> <li>To use website, application, or systems of the Company</li> <li>To conduct various surveys of the Company</li> <li>To exercise legal rights or deal with legal disputes</li> </ul>	
<ul style="list-style-type: none"> <li>To contact in case of emergency or control the disease</li> </ul>	<ul style="list-style-type: none"> <li>Vital interest, for preventing or suppressing a danger to a person's life</li> </ul>

#### 4.2 Directors

Purposes of Personal Data Processing	Legal basis
<ul style="list-style-type: none"> <li>To manage the Company such as increasing or reducing the Company's capital, business restructuring, amendment to the Company's registration information</li> <li>To arrange the board of directors' meetings, prepare the minutes of the meetings, vote and resolve in the board meetings, comply with legal requirements, etc</li> <li>To apply or verify the right to work in Thailand such as applying for work permits, applying or renewing the Visa</li> <li>To nominate, approve, appoint to the position of director of the Company, including other internal processes concerned with selecting or appointing the director</li> <li>To execute the rules, regulations, regulatory requirements of government agencies, public agencies, and related agencies</li> <li>To record and collect the Personal Data including the profile of the directors of the Company as the Company's database</li> <li>To pay the remuneration to directors</li> <li>To inspect the information on the interest of directors and the related persons of the directors, and conflict of interest transaction of the Company for collecting as an information and reporting relevant information to the regulatory authorities for acknowledgement</li> <li>To verify the identity of directors as an authorized person acting on behalf of the Company to perform the actions as required by law</li> <li>For using in power of attorney or approval to carry out the Company's objectives</li> <li>For the purposes of performing the duties of the contract in case of a directorship agreement in which directors enter into the Company</li> <li>To comply with legal requirements</li> </ul>	<ul style="list-style-type: none"> <li>Contractual basis</li> <li>Legal obligation basis</li> <li>Legitimate interest basis</li> </ul>
<ul style="list-style-type: none"> <li>To provide the IT services (e.g. access to the system, communication services, security system, etc.)</li> <li>To disclose the information through the Company's website and/or send to the external organizations in supporting of the participation in any activities as a director of the Company</li> <li>To propose for appointment as a director of external organizations and/or to be positioned in other relevant organizations</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest basis</li> </ul>

Purposes of Personal Data Processing	Legal basis
<ul style="list-style-type: none"> <li>To disclose the information through the relevant media such as publication, advertisements, electronic media, and website, etc. for acknowledgement</li> <li>To conduct an internal audit of the Company</li> <li>To administer and manage the Company's business effectively</li> <li>To organize social events or other activities held by the Company</li> <li>To prevent crimes, manage the Company's safety, such as recording of the CCTV inside the Company's areas</li> <li>To prevent accidents that may occur in the Company's premises</li> <li>To prepare audit reports, summaries of amendments, and internal prevention guidelines</li> <li>To exercise legal rights or deal with legal disputes</li> <li>To be used for benefit of the Company in joining the projects or activities, both domestic and abroad</li> </ul>	
<ul style="list-style-type: none"> <li>To collect your health information and food allergy data for attending the meeting or joining the Company's activities</li> <li>To use for public relations activities of the Company</li> </ul>	<ul style="list-style-type: none"> <li>Consent basis</li> </ul>
<ul style="list-style-type: none"> <li>To contact in case of emergency or control the disease</li> </ul>	<ul style="list-style-type: none"> <li>Vital interest, for preventing or suppressing a danger to a person's life</li> </ul>

The Company will not process your Personal Data for other purposes besides those set out in this Privacy Policy. If the Company will further process your Personal Data which is not specified in this Privacy Policy, the Company will notify you and ask for your consent before such processing unless permitted by law to do so without consent.

In case that the Company needs to process your Personal Data as permitted by laws or under the contract terms between you and the Company, and you do not provide such information to the Company. The Company may not be able to meet the contractual obligations or may not continue to do anything related to you.

## 5. Disclosure or transfer of your Personal Data

The Company may disclose or transfer your Personal Data to following third parties who process Personal Data in accordance with the purposes under this Privacy Policy. You can visit their privacy policies to learn more details on how they process your Personal Data.

- 5.1 Group of Asia Plus Group Holdings Public Company Limited: the Company may need to transfer your Personal Data to, or otherwise allow access to such Personal Data by other companies within the Group for the purposes set out above. Please see list of companies and scope of activities within the Group at <https://www.asiaplusgroup.co.th>.
- 5.2 Individual and entities which are the third parties ("the third parties"): in order to achieve the purposes of collecting and processing the Personal Data as described in this Privacy Policy such as government agencies (e.g. Ministry of Commerce, Office of the Securities and Exchange Commission, Stock Exchange of Thailand, Bank of Thailand, Revenue Department, Thailand Securities Depository (Thailand) Company Limited, Ministry of Labor, Social Security Office, Legal Execution Department, the Court or person involved in the prosecutions, Office of Insurance Commission, Anti-Money Laundering Office, etc.), other service providers e.g. electronic meeting system service provider, financial institutes, insurance companies or insurance agencies, securities companies, business partners, advisors, or professional service providers, or any other parties which are necessary to enable the Company to meet the purposes for the collection and processing of Personal Data as described in this Privacy Policy.

## 6. Cross-border transfer

In case that the Company needs to disclose or transfer your Personal Data to third parties or servers located overseas, the Company shall take steps and measures to ensure that your Personal Data is lawfully transferred.

## 7. Retention period of your Personal Data

The Company retains your Personal Data for as long as is reasonably necessary to fulfill the purposes for which the Company obtained it as set out in this Privacy Policy, and to comply with the legal and regulatory obligations. However, the Company may have to retain your Personal Data for longer duration, if required by applicable law. Once the retention period expires, the Company will destroy or de-identify your Personal Data.

## 8. Other important information about your Personal Data

### 8.1 Cookies and how they are used

If you visit our website, the Company will gather certain information automatically from you by using Cookies. Cookies are tracking technologies that are used in analyzing trends, administering our website, tracking users' movements around the website, and remembering users' settings. To learn more details about Cookies using, please visit the Company's website at [https://www.asiaplus.co.th/asps/upload\\_editor/privacy\\_policy/pdf/Cookie\\_Policy\\_customers\\_EN.pdf](https://www.asiaplus.co.th/asps/upload_editor/privacy_policy/pdf/Cookie_Policy_customers_EN.pdf)

### 8.2 Personal Data used by minors, quasi-incompetent persons, and incompetent persons

Our activities are not generally aimed at minors and the Company does not intentionally collect Personal Data from shareholders or debenture holders 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 the Company, you must obtain the consent from your parent or legal guardian prior to contacting the Company or providing us with your Personal data. If the Company learns that the Company has 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, the Company will delete it immediately or continue to process such Personal Data if the Company can rely on other legal basis apart from consent.

### 8.3 Personal Data related to third parties

In case that you provide the Personal Data of any third party to the Company, you acknowledge that you have a duty under the Personal Data Protection Law in notifying the third party of such disclosure to the Company.

## 9. 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 that the Company is 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 the Company to delete or destroy or de-identify your Personal Data that the Company 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 the Company to process of your Personal Data if you believe such data to be inaccurate or our processing is unlawful, or the Company no longer needs 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 the Company for the processing of your Personal Data, unless there are restrictions on the right to withdraw consent as required by the law;
- (H) **Lodge a complaint:** you may have the right to lodge a complaint to the competent authority if you believe the Company's processing of your Personal Data is unlawful or non-compliance with applicable data protection law.

## 10. Safety Measures

The Company will manage the retention of Personal Data with appropriate organizational and technical measures to protect and secure your Personal Data.

## 11. Change to this Privacy Policy

The Company may change or update this Privacy Policy from time to time. The Company encourages you to read this Privacy Policy carefully and periodically revisit the website: <https://www.asiaplusgroup.co.th> to review any changes that may occur in accordance with the terms of this Privacy Policy. The Company will notify you or obtain your consent again if there are material changes to this Privacy Policy, or if the Company is required to do so by law.

## 12. Contacting Us

If you wish to contact the Company to exercise your rights relating to your Personal Data or if you have any queries or complaints about your Personal Data under this Privacy Policy, please contact the Company or the Company's Data Protection Officer at:

- **Asia Plus Group Holdings Public Company Limited**  
3/1 Floor, Sathorn City Tower, 175 South Sathorn Road, Thungmahamek, Sathorn, Bangkok 10120  
E-mail: [public\\_relations@asiaplus.co.th](mailto:public_relations@asiaplus.co.th)  
Telephone: 0-2680-1111
- **Data Protection Officer  
DPO Committee**  
**Asia Plus Group Holdings Public Company Limited**  
3/1 Floor, Sathorn City Tower, 175 South Sathorn Road, Thungmahamek, Sathorn, Bangkok 10120  
E-mail: [dpo@asiaplus.co.th](mailto:dpo@asiaplus.co.th)  
Telephone: 0-2680-1567

Approved by the Board of Directors' meeting of the Company on 26 January 2023