

(English Translation)

**Privacy Notice
For Vendors and Partners**

Kiatnakin Phatra Bank Public Company Limited, Kiatnakin Phatra Securities Public Company Limited, Kiatnakin Phatra Asset Management Company Limited, KKP Dime Securities Company Limited, KKP Capital Public Company Limited, and KKP Tower Company Limited (collectively referred to as the “**Kiatnakin Phatra Financial Group**,” “we,” or “us”) - including any funds and Trusts under our management or establishment, recognize the importance of your Personal Data. Therefore, we have issued this Privacy Notice to inform you of our practices in protecting your Personal Data, to explain the reasons and methods by which we collect, use, or disclose such data, and to describe your rights regarding your Personal Data, including how you may exercise those rights.

1. Overview

We will collect, use, or disclose your Personal Data only as necessary to fulfill one or more of the purposes described in this Privacy Notice, or any other purposes specified in documents or electronic methods relating to your consent for the collection, use, or disclosure of your Personal Data.

This Privacy Notice applies to the collection, use, and/or disclosure of your personal data in connection with establishing and maintaining relationships with you in your capacity as our external service provider, counterparty, vendor, or business partner. This Privacy Notice does not apply to any services or products where you act as our customer. This Privacy Notice applies to the Personal Data (as defined in Clause 2 below) of the following data subjects:

- (1) Individuals who were, are, or will become our external service providers, counterparties, vendors, or business partners.
- (2) Individuals associated with persons who were, are, or will become our external service providers, counterparties, vendors, or business partners, such as corporate representatives, individual shareholders, contacts, individual agents, authorized persons, employees, staff, officers, personnel, and other similar persons.

Hereinafter, these individuals will be collectively referred to as “you” or “your”.

This Privacy Notice is prepared in Thai, with an English translation provided. In the event of any inconsistency, the Thai version shall prevail.

2. What Personal Data We Collect

“Personal Data” means any information relating to an individual that enables the identification of such individual, whether directly or indirectly, as specified below. We collect your Personal Data both (1) directly from you, such as through our staff or any of our communication channels, and (2) indirectly from other sources, such as companies within the Kiatnakin Phatra Financial Group, public sources (e.g., the DBD Datawarehouse), social media platforms, governmental agencies, organizations, or any persons who have a contractual relationship with us and who have complied with the applicable personal data protection laws.

“Sensitive Personal Data” means Personal Data that the law classifies as sensitive.

Personal Data includes:

- a) Identity Data such as name, surname, date of birth, nationality, ID card number, passport number (for foreigners), education, employment information (e.g., occupation, workplace, position, salary), signature, photo.
- b) Contact Details such as address, telephone number, email address.
- c) Financial and Transaction Data such as account numbers and types, PromptPay information, transaction-related information, financial history/records.
- d) Other personal data collected, used, or disclosed in connection with your relationship with us, such as information you provide to us in contracts or forms, including lists of company directors, lists of shareholders, powers of attorney, statements of work, and other related documents.

Sensitive Personal Data includes:

- a) Religion and blood type as only such information appears on an ID card and is required as evidence for establishment, compliance, exercise or defense of legal claims.

We will collect, use, or disclose your Sensitive Personal Data only when necessary to achieve the purposes stated in Section 3, and we will implement appropriate measures to protect your fundamental rights and interests.

If you refuse to provide necessary Personal Data, we may be unable to provide services to you, in whole or in part. If you provide Personal Data of another person, you are responsible for informing such person of the details of this Privacy Notice, and for obtaining their consent where legally required.

3. What are our purposes of the collection, use, and/or disclosure of your Personal Data

We collect, use, or disclose your Personal Data to achieve the purposes specified in the table below.

We rely on the lawful basis as required under the Personal Data Protection Act B.E. 2562 (2019).

Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful Basis
To assess and select external service providers, counterparties, or business partners	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest
To establish and maintain relationships with external service providers, counterparties, vendors, or business partners who have disclosed your personal data to us - for example, contract execution, contract renewal, or entering into business cooperation agreements	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest
To manage our relationship with you, including coordination, planning, operations, and dispute management	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest
To manage data of external service providers, counterparties, vendors or business partners, including recording data in internal systems and maintaining contracts or related documents that may contain your personal data	<ul style="list-style-type: none"> ● Contractual Basis ● Legitimate Interest
To report personal data to regulatory authorities supervising our business, or when required under subpoenas, warrants, or orders from government agencies or courts	<ul style="list-style-type: none"> ● Legal Obligation
To detect abnormal transactions, conduct investigations, perform audits, and undertake measures to prevent, manage, and mitigate risks related to unlawful activities, including sharing personal data to enhance our operational standards	<ul style="list-style-type: none"> ● Legal Obligation ● Legitimate Interest ● Contractual Basis ● Substantial Public Interest
To process and analyze statistical data, where analysis results cannot identify you	<ul style="list-style-type: none"> ● Legitimate Interest
To collect and use your Sensitive Personal Data (e.g., religious belief or blood type) only as appears on your national ID card	<ul style="list-style-type: none"> ● Necessary for establishment, compliance, exercise or defense of legal claims.

Purposes of the collection, use, and/or disclosure of your Personal Data	Lawful Basis
To conduct risk management, compliance and audit activities, and internal management, as well as to share data among companies within the Kiatnakin Phatra Financial Group for such purposes under the applicable intercompany agreements, while implementing appropriate security measures as required by law.	<ul style="list-style-type: none"> ● Contractual Basis ● Legal Obligation ● Legitimate Interest
To disclose Personal Data as required by foreign authorities or regulators, or in accordance with foreign laws or international treaties, such as FATCA/CRS.	<ul style="list-style-type: none"> ● Contractual Basis (between you and us, or between us and another party for your benefit) ● Legal Obligation

We may process your Personal Data for the above purposes by using technologies that exist today or may be developed in the future, including but not limited to Artificial Intelligence (AI), Cloud Computing, Blockchain, and biometric identity comparison technologies.

In addition, in some cases, we may transfer your Personal Data to other countries for the above purposes. We will proceed in accordance with Section 7 regarding the Cross Border Transfer of your Personal Data.

4. Who we will share your Personal Data with

If you have given your consent, or where it is necessary for the performance of a contract, for compliance with the law for substantial public interest, for complying with the law, or for our legitimate interests, we may send, transfer, and/or disclose your Personal Data to the following third parties, both in Thailand and overseas. We will carry out such disclosure in accordance with applicable legal requirements and ensure that an adequate Personal Data protection standard is applied.

- a) **Companies in the Kiatnakin Phatra Financial Group**, such as Kiatnakin Phatra Bank Public Company Limited, Kiatnakin Phatra Securities Public Company Limited, Kiatnakin Phatra Asset Management Company Limited, KKP Dime Securities Company Limited, KKP Capital Public Company Limited and KKP Tower Company Limited.
- b) **Our business partners**, to whom we may disclose your personal data for business operations and customer service purposes, such as co-brand partners and contracting parties. In all cases, such recipients are required to handle your personal data in compliance with applicable personal data protection laws and in accordance with this Privacy Notice.

- c) **Our external service providers**, such as information technology system developers, marketing service providers, research firms, cloud storage service providers, professional consultants, and law firms.
- d) **Financial institutions or payment system service providers** such as other financial institutions that provide payment system services for your transactions.
- e) **Regulatory and supervisory authorities** such as Bank of Thailand, Securities and Exchange Commission, Stock Exchange of Thailand, Thailand Securities Depository, Thailand Clearing House, Office of Insurance Commission (for regulatory and supervisory purposes related to insurance laws; you may review their Personal Data protection policy at <https://www.oic.or.th>), Courts, Royal Thai Police, Department of Business Development. other government authorities issuing subpoenas or seizure orders, such as Legal Execution Department, Revenue Department.
- f) **Any other persons or entities as necessary**, to achieve the purposes described in Section 3.

5. Your Rights Regarding Your Personal Data

You have the right to exercise the following rights:

5.1 Right to Access

You have the right to request access to and obtain a copy of your Personal Data that is under our responsibility, as well as the right to request that we disclose how we obtained your Personal Data in cases you did not provide consent to us.

5.2 Right to Rectification

You have the right to request that we rectify your Personal Data so that it becomes accurate, up-to-date, and does not cause misunderstanding.

5.3 Right to Erasure

You have the right to request that we delete, destroy, or anonymize your Personal Data so that it can no longer identify you, in any of the following circumstances:

- The Personal Data is no longer necessary for the purposes for which it was collected, used, or disclosed.
- You have withdrawn your consent and we can no longer rely on any other legal basis to collect, use, or disclose such Personal Data.
- You have objected to the processing and we are unable to reject such request.

- You have objected to the processing for direct marketing purposes.
- The collection, use, or disclosure of Personal Data is unlawful.

5.4 Right to Restriction of Processing

You have the right to request that we temporarily suspend the processing of your Personal Data under the following conditions:

- The processing is no longer necessary, but retention is still required for the establishment of legal claims.
- The processing is unlawful, but you request restriction instead of deletion.
- Your Personal Data is under verification for accuracy as requested by you.
- We are in the process of proving the grounds for rejecting your objection request.

5.5 Right to Data Portability

You have the right to receive your Personal Data from us in a format that is readable or usable by automated tools or devices and can be used or disclosed automatically. You also have the right to (a) request that we send or transfer such data to another data controller, where technically feasible; or (b) request to receive the data directly from us for transfer to another data controller, unless technically impossible.

5.6 Right to Object

You have the right to object to the collection, use, or disclosure of your Personal Data in the following cases:

- When your Personal Data is processed for direct marketing purposes.
- When your Personal Data is processed for scientific, historical, or statistical research purposes, unless such processing is necessary for our public interest mission.
- When your Personal Data is processed for tasks carried out in the public interest or for our legitimate interests, unless we can demonstrate compelling legitimate grounds or such processing is for the establishment, exercise, or defense of legal claims.

5.7 Right to Lodge a Complaint

You have the right to lodge a complaint with a competent authority if you believe that we process your Personal Data unlawfully or in a manner that is inconsistent with applicable Personal Data protection laws.

However, we kindly ask that you first allow us the opportunity to investigate and resolve the matter for you.

Your rights above may be subject to certain conditions. In some cases, we may not be able to proceed with your request if we still have a legal duty or obligation to collect, use, or disclose your Personal Data. We may also be unable to proceed if the nature or context of the processing makes it impossible — for example, when you still maintain deposit or loan accounts with us, continue using our services, or where we must retain your data for legally required periods even after our relationship with you has ended.

If you wish to exercise your rights, you may contact us to request the Data Subject Rights Request Form at any KKP branch, the KKP Contact Center, or via the provided link ([Click here](#)). Completed forms may be submitted at any KKP branch, the KKP Contact Center, or via email at DPO@kkpfg.com, or through other channels specified for each transaction. We will review and respond to your request within 30 days from the date of receipt. We may extend the period once for up to an additional 30 days, unless otherwise required by law.

6. How We Protect Your Personal Data

We implement technical, physical, and administrative security measures designed to provide appropriate protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. These measures include firewalls, data encryption, physical access controls when entering our data centers, and authorization controls for accessing information. While we maintain the security of our systems and services, you are responsible for maintaining the confidentiality and security of your passwords and account information, as well as ensuring that the Personal Data we hold about you is accurate and up-to-date.

We establish internal policies, guidelines, and minimum standards for managing Personal Data, such as information technology security standards, and we update such policies, guidelines, and minimum standards periodically as required by applicable laws.

In addition, employees, personnel, business partners, and external service providers are required to maintain the confidentiality of Personal Data under confidentiality agreements they have signed with us.

7. Cross Border Transfer of Your Personal Data

We may disclose or transfer your Personal Data to external parties or to servers located in other countries, where the destination country may or may not have the same level of Personal Data protection standards as those in Thailand, for the purposes described in this Privacy Notice. We have implemented various procedures and measures to ensure that the transfer of your Personal Data is carried out securely, and that the recipient of the data maintains an appropriate level of Personal Data protection. Such transfers will be conducted lawfully and in reliance on the permitted legal exceptions applicable to cross border data transfers.

8. How We Store Your Personal Data and For How Long

We will retain your Personal Data for as long as it is reasonably necessary to fulfill the purposes outlined in this Privacy Notice and to comply with our legal obligations and regulatory requirements. However, we may retain your Personal Data for a longer period if it is necessary for the establishment, exercise, or defense of legal claims. Once the retention period has expired and your Personal Data is no longer necessary for the specified purposes, we will delete, destroy, or anonymize your Personal Data in accordance with the methods and standards for Personal Data destruction prescribed by the Personal Data Protection Committee, applicable laws, or international standards.

In some cases, we may retain certain Personal Data such as your name, surname, address, and the start and end dates of your relationship with us, solely as historical records in our archive database. Such data will not be used or disclosed for any other purpose.

9. Changes to This Privacy Notice

To improve the effectiveness of our Personal Data handling practices, we reserve the right to amend this Privacy Notice as we deem appropriate. The version of the Privacy Notice published on our website shall be deemed the most current version. We will inform you of any changes if such changes have a significant impact on the processing of your Personal Data.

10. Contact Us

If you have any questions or suggestions regarding our guidelines on protecting your Personal Data or if you wish to exercise your rights in accordance with the laws, please contact us through the following channel:

Group Data Protection Officer
Kiatnakin Phatra Financial Group, 209 KKP Tower, Sukhumvit 21 (Asoke),
Khlong Toey Nua, Wattana, Bangkok 10110
or
DPO@kkpfg.com