

Personal Data Protection Policy Notice of KASIKORNBANK PUBLIC COMPANY LIMITED - Ho Chi Minh City Branch

Effective date: July 1, 2023

KASIKORNBANK PUBLIC COMPANY LIMITED - Ho Chi Minh City Branch (the "**Bank**") is a leading financial institution in Vietnam that adheres to ethical business conduct and compliance with applicable legal frameworks. The Bank is aware of your trust in the Bank's products and services and recognizes your need for security in transactions and the handling of your personal data.

To prioritize your privacy and safeguard your personal data, the Bank has set out this personal data protection policy notice (this "**Policy**"), its policies, regulations and rules for the Bank's business, providing strict measures for protecting your personal data so that you can be assured your personal data entrusted to the Bank will be processed to meet your needs and in accordance with the laws.

For the purpose of this Policy, "processing" means one or multiple activities that impact on personal data, including collection, recording, analysis, confirmation, storage, rectification, disclosure, combination, access, tracing, retrieval, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction or other relevant activities.

1. What is the purpose of this Policy?

This Policy is to inform you, as a data subject, of the types to personal data to be collected and processed, the purposes and details of the collection and/or processing of your personal data, organization and/or individuals processing your personal data as well as your legal rights in connection with personal data.

2. To whom will this Policy apply, and what are channels for personal data collection?

2.1 To whom will this Policy apply?

This Policy shall apply to you if you are classified as one or several types of the following persons.

Type of person under the Policy	Details and examples
1. Individual customer of the Bank	 the Bank's individual customer such as person who is using or has used products and / or services provided by the Bank person who requests information on products and / or services provided by the Bank person who has knowledge of information on products and / or services provided by the Bank person who has knowledge of products and / or services provided by the Bank via various channels person who has been offered or persuaded by the Bank to use or accept products and / or services provided by the Bank
2. Individual having involvement with a legal entity which is a customer of, or conducts transactions with, the Bank	 Individual having involvement with a legal entity which is a customer of, or conducts transactions with, the Bank such as shareholder director



 authorized person agent or partner employee, officer and / or assignee
 lividual having involvement with transactions of Bank or the Bank's customers such as contact person employee, staff, officer, personnel person in the family, friend, neighbor person recommended or referred by the Bank's customers investor, guarantor, mortgager, security provider, ultimate beneficial owner trade partner such as supplier, sponsor, dealer, seller, contractor, service provider, buyer, etc. person who makes payment to or receives money from the Bank's customers any other person of whom the Bank may receive personal data from transaction conducted by customers (such as property assessment or loan provision) person who visits the Bank's website or application, or online social media account or uses services at the Bank professional advisor any other individuals of similar nature
 neral individual such as person with whom the Bank has a relationship, interaction, contact in other ways, or who has provided personal data to the Bank, or of whom the Bank has received personal data, either directly or indirectly, regardless of any channel.
 n-customers such as Individuals who do not use product or service provided by the Bank, Rejected customer. Bank may need to collect, use or disclose your sonal data in a form of non-identified personal
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2.2 Channel for collection of personal data

The Bank may collect your personal data via the following channels:

(a) Personal data that you give directly to or through the Bank or is available to the Bank by your use of products, services, and/or channel, contact, visits, joining activities, searches via digital channels, branches, websites, call centers, online social media account of the Bank, email, short message service (SMS), questionnaire, name card, meeting, training, seminar, event, recreation, marketing promotion activity, assigned persons or any other means/channels;



(b) Personal data received or accessed by the Bank from other sources, such as government entities, other companies within the KASIKORNBANK Financial Conglomerate, financial institutions, financial service providers, business partners, the Credit Information Center (CIC), the credit information company (Vietnam Credit Information Joint Stock Company), information service providers, online platform of third party, public data sources, a person having legal authority or legal right, any other person or agency with which the Bank has a legal relationship, etc. Before collecting and/or gain access to your personal data from other sources, the Bank will manage to ensure that your consent is given to such third-party sources for sharing your personal data with the Bank in compliance with Vietnam's data protection laws and regulations, unless the Bank is permitted by law to collect and process your personal data without consent.

3. What personal data does the Bank collect and process?

Your personal data that the Bank collects and process may include basic personal data and sensitive personal data that can directly or indirectly identify you, including but not limited to:

- Personal information such as title, name, surname, age, gender, information on family relationship, date of birth, marital status, national identification number, passport number, nationality, country of residence, signature, data on the document issued by government agencies (such as copy of national identification card, copy of passport, identification information, other know your customer (KYC) and customer due diligence (CDD) data, etc.;
- Contact information and physical locations such as home address, workplace, telephone number, email, account ID for communications apps such as LINE, WhatsApp, Zalo, etc.;
- Work information such as career and professional field, position, current years of work, work detail, type of business etc.;
- Financial data and transaction such as information on accounts, information on deposits, account numbers, balances, interest, card number, card information, information on deposited assets, information on transactions, information on organizations and individuals as guarantors, financial history, assets, financial statements, payments, loans, investments, income data, source of income and expenses, credit score, approved credit limit, borrowing data, debt amount, collateral data and documents showing ownership of collateral details and payment history, data per risk profile assessment form, client suitability data, transaction history, transaction details and objectives for transaction, application username and password etc.;
- Technical data, devices, machines, or equipment such as IP address, MAC address, cookies, geographical location etc.; and
- Other information such as website-visiting data, still pictures, moving pictures, photos or video from CCTV, and other information deemed personal data under Vietnam's data protection laws and regulations.
- Information about your visit, a browser, app or device, pixels, and local storage, preferences, information relating to your session, and product optimizations
- Biometric identifiers ("Biometrics"), e.g., facial recognition, fingerprint recognition, retina recognition and voice recognition;

(Unless otherwise specified in this Policy, your basic personal data and sensitive personal data as earlier mentioned shall hereinafter be collectively referred to as "**Personal Data**")

If you provide Personal Data of any other third party and / or who has involvement with you to the Bank such as shareholders, directors, authorized persons, family members, reference persons, trade partners, guarantors, mortgagers, providers of collateral, beneficiaries, emergency contact persons and / or any other person per document of your transaction, etc., you represents and warrants to the Bank that you informed those persons of the details under this Policy and obtain their prior consent, if necessary, or apply other lawful bases to ensure that the Bank can collect, use and / or disclose Personal



Data of the aforementioned third party. You will indemnify the Bank for any cost, charge, damage, expenses or loss incurred to the Bank due to your failure to comply with this provision.

4. What are the Bank's purposes for collecting and/or processing your Personal Data?

The Bank will collect and / or process your Personal Data only as necessary under the Bank's legitimate purposes which include the collection and / or processing of Personal Data for your benefits in using the Bank's products and/or services that meet your own purposes. Unless the Bank is permitted by law to collect and process your Personal Data without consent, the Bank will manage to ensure that your consent is given before collecting and/or processing your Personal Data in compliance with Vietnam's data protection laws and regulations, Purposes for collection and processing or transfer of Personal Data under this Policy are as follows:

- (i) for compliance with the contract in which you are a contract party,
- (ii) for compliance with relevant laws and regulations and for serving the activities of state agency as prescribed by specialized laws
- (iii) for business operations of the Bank, and
- (iv) for any purposes provided in this Policy,

Some of the following purpose may or may not apply to you. Please consider the objectives in accordance with your relationship with the Bank on a case - by - case basis.

4.1 Compliance with Contract

To allow you to use the Bank's products and/or services that meet your purposes under your contract with the Bank or to take steps at your request prior to using the Bank's products and/or services and/or before entering into a contract with the Bank, for instance:

(1) to approve the use of any products and/or services, e.g. loan requests, investment, insurance, deposits, withdrawals, transfers, exchanges, assets or payments;

(2) to take any steps in relation to providing any products and/or services, e.g. process, contact, notify, outsource, assign right and/or duty, notify of debt payment or extension of products and/or service terms, and conduct credit analysis or fulfill the applicant's request before providing the services or assigning to third parties in order to support the services, including, but not limited to, information technology, communications, debt collection, risk management, assignment of right and/or obligation, complaint management;

(3) identification and authentication, including, but not limited to, know - your - customer (KYC) and customer due diligence (CDD) procedure;

(4) to collect and/or process the Personal Data of directors, representatives, and agents of customers that are juristic person;

(5) to receive / deliver documents or parcels.

(6) to verify and confirm the identities of applicants for services and/or transactions via digital channels, branches, websites, call centers or other channels

4.2 Compliance with relevant laws and regulations and serving the activities of state agency

To comply with applicable laws and/or the orders of competent authorities, for instance:

- (1) to comply with an order from a competent authority, government agencies, banking supervisory agencies, court;
- (2) to comply with applicable laws and regulations related to financial institutions, securities and exchange, life insurance, non-life insurance, taxes, anti-money laundering, accounting, counter-terrorism and proliferation of weapons of mass destruction financing, electronic transactions, network information security, cybersecurity, bankruptcy, and other laws and regulations which the Bank is subject to, either in Vietnam, Thailand and in other countries, including regulations and rules issued pursuant to such laws, which are now being enforced, to be amended or to be enforced in the future;
- (3) to collect and/or process the Personal Data of a person under a court's receivership; and/or



(4) to prevent, manage, respond, and minimize potential risks arising from non-compliance issues

If the Bank is required to collect and/or process your Personal Data to meet the Bank's legal obligations, the Bank may not be able to provide (or continue to provide) our products and/or services to you either partly or wholly, and it may impact on the Bank's performance of duties under the law if the Bank cannot collect your Personal Data when requested. As the essence of the Bank's performance, your consent is a must while engaging with the Bank.

4.3 Business operations of the Bank

To take necessary steps for the Bank's operations, for instance:

- (1) to record voice conversations with call centers for complaints handling, services quality enhancement and internal training;
- (2) to maintain relationship with customers, e.g. complaint handling, satisfaction surveys, customer service by the Bank's staff;
- (3) to prevent, manage, respond, and minimize potential risks arising from fraud, corruption, cyber threats, debt default or contractual breach (e.g. bankruptcy-related data), law violations (e.g. money laundering, terrorism and proliferation of weapons of mass destruction financing, offences related to property, life, body, liberty or fame), financial sanctions;
- (4) to share Personal Data to enhance work standards of affiliated companies/other companies in the same business in order to prevent, respond, and minimize the risks in (3)
- (5) to use CCTV, control of entry / exit of the Bank's premises;
- (6) to contact, record voices or images during meetings, training, seminars or booth activities;
- (7) to anonymize your Personal Data ("Anonymous Data")

If the collection and/or processing of your Personal Data is the essence of the Bank's performance, the Bank may not be able to provide (or continue to provide) our products and/or services to you either partly or wholly, and it may impact on the Bank's performance of duties under the law if the Bank cannot collect your Personal Data when requested. Your consent is a must while engaging with the Bank.

4.4 Marketing purposes

To notify you of any benefits from using Bank's products and/or services and maintain the relationship with you, for instance:

- (1) for you to receive products and/or services that are better and suitable for your needs;
- (2) for you to receive offers, privileges, recommendations and other information including eligibility to attend special activities that we offer, regardless of whether such offers and notifications concern products and/or services, privileges, promotions, information or special activities of the Bank, companies in KASIKORNBANK Financial Conglomerate, or person of whom the Bank is an agent, distributor, and/or business partner or a third party associated with the Bank, depending on your given consent. These notifications and offers may be sent to you only through the notification functions of mobile applications that you use (such as K PLUS Vietnam), call center, email and/or other electronic means; and
- (3) for you to receive notifications or offers for any products and/or services of the same types you are using for your benefits. Notifications and offers for our products and services will be sent to you only through the notification functions of mobile applications that you use (such as K PLUS Vietnam), call center, email and/or other electronic means.

In the case that the notifications and/or offers are not for the products and/or services of the Bank, the Bank will notify you of content, method, form and frequency of product introduction in connection to the marketing purposes, to take into consideration when making a decision on whether to give consent.



5. To whom may the Bank disclose your Personal Data?

5.1 The Bank may disclose your Personal Data to other persons to the extent permissible under your consent or law. The persons or entities receiving such Personal Data ("**Data Receivers**") will collect and/or process the Personal Data to the extent permissible under your consent or within the scope related to this Policy. In certain cases, you may be under the personal data protection policy of Data Receivers of your Personal Data.

The Bank may disclose your Personal Data for various purposes based on your relationship and transaction, e.g. providing services to you, analyzing and developing products and/or services, conducting research or analyzing statistical data, promoting sales and advertising by the Bank, managing the organization, preventing corruption, allowing the Bank's supporting service providers to provide related services to the Bank, verifying customers' identity, etc.

The Bank may disclose the data to Data Receivers, for example, companies within KASIKORNBANK Financial Conglomerate, Personal Data Processors; business partners, potential partners, co-branding alliances, cloud computing service providers; external service providers; the Bank's agents, sub-contractors, financial institutions, card schemes, auditors, external auditors, legal advisors, tax advisors or other advisors or experts (as the case may be), credit rating companies, asset management companies, the Credit Information Center (CIC), the credit information company (such as Vietnam Credit Information Joint Stock Company etc.), competent authorities, prospective right/obligation assignees and/or right/obligation assignees in any transaction or business merger of the Bank, online social media providers, any corporations or individuals under a relationship or contract with the Bank(including executives, staff, employees, contractors, and agents, the Bank's advisors and advisors of Data Receivers, banking supervisory agencies, courts, any other person as necessary to perform duties under laws or regulations or for protection of the Bank's rights, third party's rights, which may include any related legal procedures, and/or other individuals or organizations having legal authority or legal rights or at the request of the competent authorities for the same purposes above.

- 5.2 If the Bank disclose your Personal Data to other persons for the marketing purposes of the Data Receiver, e.g. sales promotions, advertising, or product and/or service offers for you, etc., the Bank will notify you of a list of the Data Receivers to take into consideration when making a decision on whether to give consent. These notifications and offers for marketing purposes will be sent to you only through the notification functions of mobile applications that you use (such as K PLUS Vietnam) as well as to your phone numbers and/or email addresses given to us.
- 5.3 In the event that you apply for loan or credit facility provided by the Bank, you agree and acknowledge that the Bank is authorized to provide your credit information to the Credit Information Company of which the Bank is a participating organization in order to analyze, process, evaluate and synthesize your credit information data for assessing financial needs and other lawful purposes as prescribed by laws under the following terms and conditions:
 - (1) You are the account owner of an account opened with the Bank whose information is recorded in:
 - (i) K PLUS Vietnam or other channels/application of the Bank;
 - (ii) the application for credit extension in K PLUS Vietnam or any other applicable applications/channels of the Bank for applying loan or credit facility from the Bank that was submitted to the Bank;
 - (iii) the Bank approval notice; and
 - (iv) Loan agreement/credit agreement.
 - (2) The Credit Information Company means Vietnam Credit Information Joint Stock Company, enterprise registration certificate No. 0102547296 firstly issued on 27/11/2007 (as amended



from time to time) in order to analyze, process, evaluate and synthesize Customer's credit information data for assessing financial needs and other lawful purposes as prescribed by the applicable laws.

- (3) In the event that the Credit Information Company certificate is revoked, the Bank shall stop providing your credit information to the Credit Information Company and your credit information at the Credit Information Company will be handled in accordance with the government's regulations on the provision of credit information services. Within a maximum period of 10 (ten) Business Days from the date the Bank receives the notice from the Credit Information Company about the credit information processing plan, the Bank will notify you of the processing of their credit information processing in such case. ("**Business Day**" means a day (other than a Saturday, a Sunday or a public holiday as announced by the State Bank of Vietnam) on which banks are open for general business in Vietnam.)
- (4) In this context, you understand that the Credit Information Company is responsible for ensuring the storage and maintenance in full and accuracy of your credit information provided by the Bank. You have the right to request the Credit Information Company or the Bank to ensure the accuracy of your credit information when there is clear evidence to prove your credit information in the system of the Credit Information Company is inaccurate or incomplete.
- (5) You affirm to understand and have clear awareness that: (i) the credit information provided includes sensitive personal data as stipulated by the laws regarding personal data protection; (ii) the credit information contains sensitive personal data that will be collected, processed, and stored for a minimum period of 05 (five) years, for the purpose of creating credit information products using specialized software provided by the Credit Information Company; and (iii) any consent by you under this Policy is voluntary and based on a clear understanding of you of its rights as per relevant legal provisions.

6. Will the Bank send or transfer your Personal Data inbound or to other countries?

The Bank may send or transfer your Personal Data to other companies within KASIKORNBANK Financial Conglomerate, affiliated companies/companies in the same business located in Vietnam territory or to other countries or to other recipients of data in the ordinary course of the Bank's business operation. For instance, sending or transferring Personal Data for storage on cloud platforms or servers located inbound or in other countries.

The Bank will ensure that Personal Data will be sent or transferred in accordance with law and will set Personal Data protection measures as deemed necessary, appropriate and consistent with confidentiality measures, e.g. by entering into Data Processing Agreement with Personal Data Processor who processes Personal Data on behalf of the Bank, setting out a Personal Data policy that complies with the relevant laws and controlling the sending and transferring to comply with applicable laws and regulations.

The Bank will comply with applicable laws and regulations relating to the transfer of your Personal Data to other countries, including but not limited to the preparation, storage, notification and amendment of dossiers on assessment of impact of the cross-border transfer of Personal Data.

7. How long does the Bank retain your Personal Data?

The Bank will retain your Personal Data for as long as necessary during the period you are a the Bank's customer or have a relationship with the Bank, or for as long as necessary in connection with the purposes set out in this Policy which must be no longer than 10 years after the termination of the relationship with you as the customer, unless the following grounds occurred:



- 7.1 the law requires or permits a longer retention period, e.g. retention pursuant to the Anti-money Laundering Law, Accounting Law, taxation law, retention for proof and examination in the event of a dispute the within the legal prescription period;
- 7.2 it is necessary to prevent the Bank from fraud, wrongfulness and/or massive damages.

The Bank may irrecoverably erase, destroy or anonymize the Personal Data when it is no longer necessary or when the period lapses and request Data Receivers to irrecoverably delete all the Personal Data stored by them, unless otherwise prescribed by law.

8. How does the Bank protect your Personal Data?

For retention of your Personal Data, the Bank implements technical measures and organizational measures to ensure appropriate security in the Personal Data processing and preventing a Personal Data breach. The Bank has set out policies, rules and regulations on Personal Data protection, such as security standards of information technology and measures to prevent Data Receivers from using or disclosing the data outside the purposes without authorization or unlawfully. The Bank has amended the policy, rules and regulations as frequently as necessary and appropriate.

Moreover, the Bank's executives, staff, employees, contractors, agents, advisers and Data Receivers are obligated to maintain the confidentiality of Personal Data pursuant to confidentiality measures provided by the Bank.

We strive to use commercially acceptable technical, administrative and physical measures to protect your Personal Data. However, as no method of transmission over the Internet, or method of electronic storage, is totally secure, we cannot guarantee its absolute security.

You shall notify the Bank immediately when becoming aware of any security incident and take necessary actions, where possible, to minimize the impact and likely consequences of the security incident. The Bank reserve the rights to not be excluded from any responsibility for any losses and damages resulting from your negligence and incompliance with this Policy.

9. What are your rights related to your Personal Data?

Your rights described here are legal rights of which you should be informed. You may exercise any of these rights within the legal requirements and this Policy at the present or to be amended in the future as well as regulations set out by the Bank. In case you are under 15 years old or your legal contractual capacity is restricted, your father and/or mother, appointed guardian or authorized representative may request to exercise these rights on your behalf.

- **9.1 Right to be informed :** Unless otherwise provided by law, you have the right to be informed of your personal data processing, notably the processing purposes, methods, types of personal data to be processed, entities involved in the processing, potential unexpected consequences and/or damages, the start time and the end time of personal data processing, and complaint mechanism etc.
- **9.2 Right to give consent :** You have the right to agree or disagree with the Bank in requesting your consent to process your personal data as provided in the terms and conditions and/or agreements between you and the Bank.
- **9.3 Right to access Personal Data** : You have the right to access your Personal Data under the Bank's responsibility to view, correct or reasonably request the Bank to correct your personal data to be updated, complete and not misleading, unless otherwise provided by law.



9.4 Right to withdraw consent : If you have given consent to the Bank to collect and/or processing your Personal Data, you have the right to withdraw such consent at any time throughout the period your Personal Data is available to the Bank, unless it is restricted by law or there is a contract with you which remains valid. The collection and / or processing of your Personal Data which was undertaken before the withdrawal of your consent shall not be affected.

However, the withdrawal of your consent related to and required for the products and/or services request may prevent the Bank from complying with the contract or providing products and/or services to you, or may cause the transaction or any other related activities to be suspended or temporarily discontinued, or may affect your knowledge of products and/or services, for instance, you may not receive privileges, promotions or new offers, products and/or services that are enhanced and consistent with your needs, or may not receive news and recommendations that are beneficial, etc. For your benefits, you are advised to determine and inquire about the potential impacts before deciding to withdraw your consent.

- **9.5 Right to delete Personal Data** : You have the right to request the Bank to erase, destroy or anonymize your Personal Data if you believe that the collection and/or processing of your Personal Data is against relevant laws, retention of the data by the Bank is no longer necessary in connection with related purposes under this Policy, or when you request to withdraw your consent or to object to the processing as earlier described.
- **9.6 Right to restrict processing of Personal Data :** You have the right to restrict the processing of your personal data. The restriction on the processing of personal data will be implemented with regards all personal data that you request the restriction.
- **9.7 Right to provide Personal data :** You have the right to request the Bank to provide you or your authorized persons with your personal data, unless otherwise provided by law.
- **9.8 Right to object to processing Personal Data :** You have the right to object to the collection and/or processing of your Personal Data at any time to prevent or limit the disclosure of your personal data or the use of your personal data for advertising and marketing purposes, unless otherwise provided by law. If you object, the Bank will continue collecting and/or processing your Personal Data only when the Bank can establish other legal basis for doing so, or to comply with the laws, and the Bank will do so on a case-by-case basis. In case the Bank has the necessity to retain your Personal Data due to the aforementioned reasons, the Bank will notify you of such reasons and apply necessary measures to ensure that your Personal Data is protected and will be further processed on a necessity basis as notified to you.
- **9.9 Right to complain, denounce and initiate lawsuits :** You have the right to complain, denounce to competent authorities or initiate a lawsuit pursuant to relevant laws if you believe that the collection and/or processing of your Personal Data is violating or not complying with relevant laws.
- **9.10 Right to claim damage compensation :** You have the right to claim damages arising from violations against laws and regulations on data protection related to your Personal Data, unless otherwise agreed by the parties or otherwise provided by law.
- **9.11 Right to self-protection :** You have the right to self-protection according to the applicable laws, including but not limited to the Civil Code, or request competent agencies and organizations to implement civil right protection methods, such as compulsory termination of the violating act, public apology or correction, compensation for loss or damage etc.



The exercise of rights above may be restricted under relevant laws, and, in certain cases, it may be necessary for the Bank to deny your requests or may prevent the Bank from complying with your request, such as to comply with laws or court orders, public tasks, exercising the aforementioned rights may potentially violate other persons' rights or freedoms, etc. If the Bank denies the request, the Bank will inform you of such reason(s) for such denial and apply necessary measures to ensure that your Personal Data is protected and will be further processed on a necessity basis as notified to you.

Channels **Rights K-Contact Center** Branch **K PLUS Vietnam** Right to be informed Right to give consent Right to withdraw consent Right to access Personal Data Right to object to processing Personal Data \checkmark Right to delete Personal Data Right to restrict processing of Personal Data Right to provide Personal Data Right to complain/ denounce/ initiate lawsuits Right to self- protection Right to claim damage compensation

You may request to exercise your rights via the following channels:

10. Will the Bank rectify or revise this Policy?

The Bank may consider rectifying, revising or changing this Policy from time to time, as deemed appropriate and permitted by law. In case of rectification or revision of, or change in this Policy, the Bank will announce the current policy on the Bank's website.

11. How can you contact the Bank?

If you have any suggestions or inquiries regarding the collection and/or processing of your Personal Data as well as a request to exercise your rights under this Policy, you may contact the Bank via the Bank's branches at KASIKORNBANK PUBLIC COMPANY LIMITED - Ho Chi Minh City Branch, Sun Wah Tower, 115 Nguyen Hue Street, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam, or K-Contact Center at tel. +8428 3821 8888 or KPLUS Vietnam.