

Effective date: February 16, 2023

KASIKORNBANK PUBLIC COMPANY LIMITED - Ho Chi Minh City Branch. (“**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 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.

1. What is the purpose of this Policy?

This Policy is to inform you, as a data subject, of the purposes and details of the collection, usage, storage, disclosure and/or transfer of your personal data as well as your legal rights in connection with personal data.

2. What personal data does the Bank collect, use, store and/or disclose?

**2.1 Personal Data** that the Bank collects, uses, stores and/or discloses includes data that can directly or indirectly identify you as follows:

**2.1.1** Personal data that you give directly to or through the Bank or is available to the Bank by your use of products and/or services, contact, visits, searches via digital channels, branches, websites, call centers, assigned persons or other means.

**2.1.2** Personal data received or accessed by the Bank from other sources, i.e. not directly from you, notably including government entities, other companies in the KASIKORN 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, etc. The Bank will collect your personal data from the other sources only when your consent is given to such sources for sharing your personal data with the Bank, unless the Bank is permitted by law to collect and process your personal data without consent.

Your personal data that the Bank collects, uses, stores and/or discloses may include basic personal data and sensitive personal data as follows:

**2.2 Basic Personal Data**, notably including but not limited to:

- Personal information such as name, surname, age, date of birth, marital status, national identification number and passport number;
- Contact information such as home address, workplace, telephone number, email, account ID for communications apps such as LINE, WhatsApp, Zalo, etc.;
- Data related to devices or machines such as IP address, MAC address, cookies, etc.; and
- Other information such as website-visiting data, still pictures, moving pictures and other information deemed personal data under Vietnam’s data protection laws and regulations.

**2.3 Sensitive Data**, which is personal data specially categorized by law, will be collected, used, stored and/or disclosed by the Bank only when the Bank has obtained consent from you to collect and process your sensitive data if needed, except where exempted by law.

The Bank may collect, use, store and/or disclose your sensitive data for the purpose of verifying and confirming the identities of applicants for services and/or transactions via digital channels, branches, websites, call centers or other channels, etc., notably including but not limited to:

- 2.3.1** Biometric identifiers (“**Biometrics**”), e.g., facial recognition, fingerprint recognition, retina recognition and voice recognition;
- 2.3.2** Financial information such as income, expenses, savings account numbers, balances, interest, credit card numbers, debit card numbers, credit information, financial history and assets; and
- 2.3.3** Transaction information such as financial statements, payments, loans, investments and physical locations.

(Unless otherwise specified in this Policy, your basic personal data and sensitive data discussed above will be collectively called “**Personal Data**”)

### 3. What are the Bank’s purposes for collecting, using, storing and/or disclosing your Personal Data?

The Bank will collect your Personal Data for your benefits in using products and/or services, for performing legal obligations required by any law applicable to the Bank or you, and for any purposes provided in this Policy, which are as follows:

**3.1 Contractual Basis:** 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, 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. processing, contacts, notifications, outsourcing, right and/or duty assignment, notification of debt payment or extension of products and/or service terms, and conducting credit analysis or fulfilling the request of the borrower 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) to collect, use, store and/or disclose the Personal Data of directors, representatives, and agents of customers that are juristic person; and/or
- (4) to receive and/or dispatch parcels.

**3.2 Legal Obligations:** to comply with relevant or applicable laws, for instance:

- (1) to comply with an order from a competent authority; and/or
- (2) to comply with applicable laws and regulations related to financial institutions, securities and exchange, life insurance, non-life insurance, taxes, anti-money laundering, 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 in Vietnam, Thailand and in other countries, including regulations and rules issued pursuant to such laws.

If the Bank is required to collect, use, store and/or disclose your Personal Data to meet our Legal Obligations or enter into an agreement with you, the Bank may not be able to provide (or continue to provide) our products and/or services to you if the Bank cannot collect your Personal Data when requested.

### **3.3 Banking operations**

#### **3.3.1 To take necessary steps for the Bank's operations that does not contradict to personal data related regulations for instance:**

- (1) to record voice conversations with call centers or images from CCTV for security purposes or to exchange ID cards before entering buildings.

to collect, use, store and/or disclose the Personal Data of a person under a court's receivership order;

- (2) to anonymize your Personal Data ("**Anonymous Data**"); and
- (3) to prevent, respond, and minimize potential risks arising from corruption, cyberthreats, 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), including sharing Personal Data to enhance work standards of affiliated companies/other companies in the same business in order to prevent, respond, and minimize the above risks;

#### **3.3.2 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) to contact, record voices or images during meetings, training, seminars or booth activities;
- (3) 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 KASIKORN Financial Conglomerate, or person of whom the Bank is an agent, agent, distributor, business partner or a third party associated with the Bank, depending on your given consent. These notifications and offers will be sent to you only through the notification functions of mobile applications that you use (such as K PLUS Vietnam); and
- (4) to maintain relationship with customers, e.g. complaint handling, satisfaction surveys, customer service by the Bank's staff, 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).

#### **4. To whom may the Bank disclose your Personal Data?**

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 data will collect, use, store and/or disclose the Personal Data to the extent permissible under your consent or related to this Policy.

The Bank may disclose your Personal Data for various purposes, 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 other persons or entities, for example, companies in the KASIKORN 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, auditors, external auditors, credit rating companies, and asset management companies, the Credit Information Center (CIC), the credit information company (Vietnam Credit Information Joint Stock Company), and other credit information company, competent authorities, Prospective right/obligation assignees and/or right/obligation assignees in any transaction or business merger of the Bank, 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 those persons or entities who receive the data, and/or other individuals/ organizations as prescribed by the Related Laws and Regulations or at the request of the competent authorities for the same purposes above. etc.

If disclosing 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. Can the Bank send or transfer your Personal Data within border or to other countries?

When it is necessary, the Bank may send or transfer your Personal Data to affiliated companies/companies in the same business located within the border or in other countries or to other receivers in the ordinary course of the Bank's business, e.g. sending or transferring the Personal Data to be stored on servers/clouds within border or in other countries.

The Bank will ensure that the sending and transferring are in compliance with legal requirements and will put in place Personal Data protection measures as necessary, appropriate and consistent with confidentiality measures, e.g. by entering into Data Processing Agreement with receivers or, in the case of affiliated companies/companies in the same business being the receivers, setting out a Personal Data policy that is audited and certified by the competent authorities under the relevant laws and controlling the sending and transferring to comply with such policy instead of legal requirements.

6. 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 customer or under relationship with the Bank, or for as long as necessary in connection with the purposes set out in this Policy which must be at least 10 years starting from the termination of the relationship with you as the customer, unless the law requires or permits a longer retention period, e.g. retention pursuant to the Anti-money Laundering Law, retention for proof and examination in the event of a dispute within the legal prescription period.

The Bank may erase, destroy or anonymize the Personal Data when it is no longer necessary or when the period lapses.

7. 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, e.g. 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 keep the Personal Data in confidence pursuant to confidentiality measures provided by the Bank.

8. What are your rights related to 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 policies at the present or as 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 mother, guardian or representative may request to exercise the rights on your behalf.

**8.1. Agree or disagree:** You have the right to agree or disagree with the Bank in requesting your consent to process your data that is not necessary for the operation process of the Bank as provided in the Terms and Conditions

**8.2 Withdrawal of consent:** If you have given consent to the Bank to collect, use, store and/or disclose 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 you are still under a beneficial contract. Withdrawal of your consent may affect your use of products and/or services, e.g. you may not receive privileges, promotions or new offers, products and/or services that are enhanced and consistent with your needs, beneficial information, etc. For your benefits, you are advised to learn and ask for consequences before withdrawing your consent.

**8.3 Data Access:** You have the right to access your Personal Data that is under the Bank's responsibility, to request the Bank to make a copy of such data for you, and to request the Bank to reveal as to how the Bank obtained your Personal Data

**8.4 Objection:** You have the right to object to the collection, use, storage and/or disclosure of your Personal Data at any time if such collection, use, storage and/or disclosure of Personal Data is conducted for the legitimate interests of the Bank or any related corporation or individual within your reasonable expectations, or for carrying out public tasks. If you object, the Bank will continue collecting, using, storing and/or disclosing your Personal Data only when the Bank can establish a legal basis that doing so is more important than your fundamental rights, or to affirm legal rights, comply with the laws, or defend legal proceedings, 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. In addition, you have the right to object to the collection, use, storage and/or disclosure of your Personal Data carried out for purposes related to marketing or scientific, historical or statistical research.

**8.5 Data Erasure or Destruction:** You have the right to request the Bank to erase, destroy or anonymize your Personal Data if you believe that the collection, use, storage and/or disclosure 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.

**8.6 Processing Suspension:** You have the right to request the Bank to suspend processing your Personal Data during the period in which the Bank examines your rectification or objection request, or when it is no longer necessary and the Bank must erase or destroy your Personal Data pursuant to relevant laws but you instead request the Bank to suspend the processing.

**8.7 Data Rectification:** You have the right to rectify your Personal Data to be updated, complete and not misleading.

**8.8 Complaint Lodging:** You have the right to complain to competent authorities pursuant to relevant laws if you believe that the collection, use, storage and/or disclosure of your Personal Data is violating or not complying with relevant laws.

**8.9** In the event that the credit information company certificate is revoked, you acknowledge that all credit information that have been provided and obtained by the credit information company will be processed in accordance with the Government’s regulations. Within a maximum period of 10 (ten) working 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 the credit information processing in such case.

**8.10** The exercise of rights above may be restricted under relevant laws, and it may be necessary for the Bank to deny your requests or may not be able to carry them out, e.g. to comply with laws or court orders, public tasks, your request as a breach of rights or freedom of other persons, etc. If the Bank denies the request, the Bank will inform 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.

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

Right	Channel		
	K-Contact Center	Branch	K PLUS Vietnam
Agree or Disagree	/	/	
Consent Withdrawal		/	/
Data Access	/	/	
Objection	/	/	
Data Erasure or Destruction	/	/	
Processing Suspension	/	/	
Data Rectification	/	/	

## 9. How can you contact the Bank?

If you have any suggestions or inquiries regarding the collection, use, storage and/or disclosure of your Personal Data as well as a request to exercise your rights under this Policy, you may contact the Bank via the following channel:

- K-Contact Center : Tel +8428 3821 8888

Address : 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