



BANGKOK ASSET
INTERGROUP



Personal Data Protection Policy

Internal Use_YE'2025

No. BKA-SE 009-2025/PC-ORG-014

Personal Data Protection Policy

1. Introduction

Bangkok Asset Intergroup Public Company Limited, including persons involved in the processing of personal data under the instruction of, or on behalf of, Bangkok Asset Intergroup Public Company Limited, hereinafter collectively referred to as the “Company”, recognizes the importance of personal data and other information relating to you, collectively referred to as “Data”.

To ensure that you can be confident that the Company maintains transparency and accountability in the collection, use, and disclosure of your Data in accordance with the Personal Data Protection Act B.E. 2562 (2019) (the “Personal Data Protection Law”) and other applicable laws, this Personal Data Protection Policy (the “Policy”) has been prepared to explain to you the details of the collection, use, disclosure, and other processing, collectively referred to as “Processing”, of personal data carried out by the Company, including its officers and relevant persons acting for or on behalf of the Company. The key details are as follows:

2. Scope of Application

This Policy applies to personal data of persons who currently have, or may in the future have, a relationship with the Company and whose personal data is processed by the Company, its officers, employees under contract, business units or other operating units of the Company, including contractual parties or third parties who process personal data for or on behalf of the Company (“Personal Data Processors”), in connection with various products and services, such as websites, application systems, documents, or other services controlled or supervised by the Company, collectively referred to as the “Services”.

Persons who have a relationship with the Company under the preceding paragraph include:

- (1) individual customers;
- (2) employees, workers, or staff;
- (3) business partners and service providers who are natural persons;
- (4) directors, authorized persons, representatives, agents, shareholders, employees, or other persons having a similar relationship with juristic persons that have a relationship with the Company;
- (5) users of the Company’s products or services;
- (6) visitors to, or users of, the websites www.bangkokassets.com and www.bangkokasset.co.th, including systems, applications, devices, or other communication channels controlled or supervised by the Company; and
- (7) other persons whose personal data is collected by the Company, such as job applicants, family members of officers, guarantors, beneficiaries under insurance policies, and similar persons.

Items (1) to (7) above are collectively referred to as “you”.

In addition to this Policy, the Company may issue a Privacy Notice (“Notice”) for specific products or services of the Company in order to inform Data Subjects who are service users of the personal data to be processed, the purposes and lawful bases for such processing, the retention period of personal data, and the rights in relation to personal data that the Data Subject may have in respect of such specific product or service.

In the event of any material inconsistency between the provisions of Privacy Notice and this Policy, the provisions of Privacy Notice for the relevant service shall prevail.

3. Definitions

3.1 **“Personal Data”** means any information relating to a natural person which enables the identification of such person, whether directly or indirectly, but does not include information of a deceased person in particular.

3.2 **“Sensitive Data”** means personal data as prescribed under Section 26 of the Personal Data Protection Act B.E. 2562 (2019), including data relating to race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data which may affect the Data Subject in a similar manner as prescribed by the Personal Data Protection Committee.

3.3 **“Data Processing”** means any operation performed on personal data or sets of personal data, whether by automated means or otherwise, such as collection, recording, copying, organization, storage, receipt, consideration, improvement, alteration, use, retrieval, disclosure, transfer, dissemination, forwarding, combination, or any other act which makes data available, including restriction, deletion, or destruction.

3.4 **“Data Subject”** means a natural person who is the owner of personal data collected, used, or disclosed by the Company.

3.5 **“Data Controller”** means a person or juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of personal data.

3.6 **“Data Processor”** means a person or juristic person who carries out the collection, use, or disclosure of personal data pursuant to the instructions of, or on behalf of, a Data Controller, provided that such person or juristic person is not a Data Controller.

4. Sources of Personal Data Collected by the Company

The Company collects or obtains various types of personal data from the following sources:

4.1 Personal data collected directly from the Data Subject through various service channels, such as application procedures, registration, job applications, contract signing, documents, surveys, use

of products, services, or other service channels controlled or supervised by the Company, or when the Data Subject communicates with the Company at its premises or through other contact channels controlled or supervised by the Company.

- 4.2 Data collected by the Company when the Data Subject accesses websites, products, or other services under a contract or pursuant to the Company's business purposes, such as the monitoring of website usage behavior, products, or services of the Company through the use of cookies on the websites www.bangkokassets.com and www.bangkokasset.co.th, or through software installed on the Data Subject's device.
- 4.3 Personal data collected by the Company from sources other than the Data Subject, where such sources have the authority, lawful grounds, or consent of the Data Subject to disclose such data to the Company, such as the connection of digital services of government agencies for the provision of integrated public services to the Data Subject, receipt of personal data from other government agencies where the Company is required to support relevant operations, and where necessary for the provision of contractual services which may involve the exchange of personal data with contractual agencies.

This also includes cases where you provide the personal data of a third party to the Company. In such case, you are responsible for informing such person of the details under this Policy or the relevant product or service Notice, as applicable, and obtaining consent from such person where consent is required for the disclosure of data to the Company.

If the Data Subject refuses to provide data necessary for the provision of the Company's services, the Company may be unable to provide such services to the Data Subject, whether in whole or in part.

5. Collection of Personal Data

The Company shall collect personal data only after obtaining prior consent from the Data Subject, except in the following cases:

- 5.1 Contractual necessity: where the collection, use, or disclosure of personal data is necessary for the provision of services or performance of a contract between the Data Subject and the Company.
- 5.2 Prevention or suppression of danger to life, body, or health.
- 5.3 Compliance with law.
- 5.4 Legitimate interests of the Company: where it is necessary for the legitimate interests of the Company's operations, taking into primary consideration the rights of the Data Subject, such as fraud prevention, network security, and the protection of the rights, freedoms, and interests of the Data Subject.

5.5 Research or statistics: where historical or archival documents are prepared for public interest, or for research or statistical purposes, with appropriate safeguards to protect the rights and freedoms of the Data Subject.

5.6 Public task: where it is necessary for the performance of a task carried out in the public interest or the exercise of official authority vested in the Company.

Where the Company is required to collect your personal data for the performance of a contract, compliance with legal obligations, or necessity for entering into a contract, if you refuse to provide personal data or object to processing for the relevant purposes, the Company may be unable to carry out the requested action or provide the requested services, whether in whole or in part.

6. Categories of Personal Data Collected by the Company

In collecting and retaining personal data, the Company shall use lawful methods and shall limit such collection to the extent necessary for the Company's operational purposes, including the following categories:

Category of Personal Data	Details and Examples
Personal identification data	Data that identifies you or contains your identifying information, such as name and surname, age, date of birth, gender, nationality, national identification number, passport number, driving license number, signature, marital status, title, occupation, education, job position, affiliation, insurance number or insurance card, and other official documents that can identify you.
Contact data	Data used to contact you, such as address, telephone number, email address, business card, workplace, and social media account name.
Image data	Image data, such as still images and moving images of you or your property collected from closed-circuit television (CCTV) cameras or cameras used upon entry into the Company's premises.
Platform user account data	Platform user account data, such as username and password.
Official document data	Your official document data, such as copies of national identification cards, house registration documents, passports, work permits, birth certificates, death certificates, driving licenses, professional licenses, vehicle registration books, and military documents such as Military Reserve Identification Book (Sor Dor 8).
Financial data	Your financial data, such as copies of bank passbook pages, bank account numbers, credit card numbers, loan account numbers, salary,

Category of Personal Data	Details and Examples
	credit limit information, transaction data, including information relating to products purchased, price, payment method, payment details, income, tax, provident fund, employee benefits such as pensions or insurance policy benefits, and other related data such as reimbursement or allowance details.
Education data	Education data, such as educational qualifications, education history, transcripts, education certificates, diplomas, or other documents evidencing academic results.
Data relating to relevant third parties	Data relating to relevant third parties, such as spouse, children, parents, emergency contact persons, references, and beneficiaries.
Data relating to purchases of goods and services	Data relating to purchases of goods and services, such as purchase history, interest in purchasing products and services, order numbers, and request numbers.
Data collected by the Company or automated systems from Company devices	Data collected by the Company or automated systems from Company devices, such as IP addresses, cookies, service usage history and behavior, purchase or service usage history, voice, photographs, moving images, chat channels, and geolocation.
Data obtained from Company systems or from employment	Data obtained from Company systems or from employment, such as employee ID, work permit number, attendance records and working hours, overtime, absence and leave records, username, password, usage history and behavior, images and/or videos from CCTV, including salary-related data, current salary, and expected salary.
Work-related data	Work-related data, such as job position, occupation details, qualifications, skills, membership of professional organizations, experience, employer opinions, performance evaluations, training, training results, certification records, employment history, CV or resume, professional license number, copy of food handler card, licenses, years of service, start date, and end date of employment, including any documents required by the Ministry of Labour and the Immigration Bureau evidencing your ability to work in the country.

Category of Personal Data	Details and Examples
Information technology usage and access data	Data relating to the use of, and access to, computers, work systems, websites, applications, networks, electronic devices, and email systems in order to comply with the Company’s information technology policy and applicable laws, including technical data such as IP address, operating system type, browser type and version, device data, and data collected through the use of cookies.
Sensitive personal data	Your sensitive personal data, such as race, religion, disability data, medical data, health data, criminal records, and biometric data, such as fingerprints and facial recognition data.

7. Cookie

The Company collects and uses cookies and similar technologies on websites under the Company’s control, such as www.bangkokassets.com, or on your device depending on the services you use. This is for the purpose of ensuring the security of the Company’s services, providing convenience and a positive user experience, and improving the Company’s websites to better meet your needs. You may configure or delete cookies by adjusting the settings in your web browser.

8. Purposes of Collecting Personal Data

The Company collects your personal data for various purposes, depending on the type of product, service, or activity you use, the nature of your relationship with the Company, and the relevant context. The purposes specified below serve as a general framework for the Company’s use of personal data. Only the purposes relevant to the products or services you use or the relationship you have with the Company shall apply to your Data.

- 8.1 To enter into a contract or perform contractual obligations to which the Data Subject is a party, such as employment contracts, sale and purchase agreements, service agreements, or to carry out actions requested prior to entering into a contract, including transactions relating to the Company’s products or services, such as ownership transfer appointments and activities relating to condominium juristic person management services. This includes the performance of contractual obligations between the Company and the Data Subject and/or between the Company and third parties for the benefit of the Data Subject.
- 8.2 To respond to inquiries, provide assistance to the Data Subject, and manage the relationship between the Company and the Data Subject.

- 8.3 To provide services and to develop and improve the Company's goods, products, and services, including other services or products that may be offered in the future, as well as to maintain and carry out operations relating to such services.
- 8.4 To provide information, recommend goods, products, and services, offer benefits, or conduct marketing communications, promotional activities, or benefit offerings through contact channels provided by the Data Subject, as consented to by the Data Subject or as you have consented to the Company.
- 8.5 To conduct surveys, analyses, research, and statistical data preparation for marketing purposes or for the development and improvement of the Company's business operations, as consented to by you.
- 8.6 To develop and improve products, modify products or services, develop new products, conduct inspections, surveys, promotional activities, and improve the Company's services to better meet the needs of the Data Subject.
- 8.7 For the benefit of internal business administration or operations of the Company as necessary under legitimate interests.
- 8.8 To monitor, supervise, restrict access to controlled areas, and maintain security at the Company's buildings or premises.
- 8.9 To comply with laws applicable to the Company's operations, such as withholding tax, fraud prevention, and complaint management.
- 8.10 To provide information to government authorities legally empowered to request such information, such as the Stock Exchange of Thailand, the Royal Thai Police, the Anti-Money Laundering Office, the Revenue Department, and courts.
- 8.11 To carry out accounting and financial activities, such as auditing, debt notification and collection, exercise of welfare benefits, tax matters, and records of transactions required by law.
- 8.12 For the legitimate interests of the Company, such as recording complaints through a call center system, recording still images or CCTV footage for crime prevention, and transferring data within the group of companies for management purposes.
- 8.13 To conduct investigations, examine work standards, and comply with laws, rules, regulations, or obligations under the Company's internal rules.
- 8.14 To respond to your requests or to carry out actions according to the wishes of the Data Subject as notified to the Company, such as receiving complaints.
- 8.15 To verify customer identity and/or identify the Data Subject when accessing services through various channels or contacting the Company.

- 8.16 To remedy, prevent, or limit potential damage.
- 8.17 To take any necessary and appropriate action in various cases, such as investigating and preventing acts that violate or may violate the law, and protecting the rights to privacy, personnel, and Data Subjects.
- 8.18 To carry out processes under the Company's internal regulations, such as employee welfare, other employee benefits, and annual health check-ups.
- 8.19 To respond to requests from domestic government agencies or authorities, including foreign government agencies or authorities in the country where the Data Subject resides.
- 8.20 To arrange visas where an employee is a personnel member from an affiliated company located overseas, including other requirements relating to travel.
- 8.21 For any other purposes for which the Company has obtained your explicit consent.

9. Transfer and Disclosure of Personal Data

The Company shall not disclose or transfer your personal data to external parties unless your explicit consent has been obtained, or in the following cases:

- 9.1 To achieve the purposes specified in this Personal Data Protection Policy, the Company may need to disclose or share data only to the extent necessary with business partners, service providers, or external agencies. The Company shall enter into a Data Processing Agreement or Data Sharing Agreement as required by law.
- 9.2 The Company may disclose or share personal data with its affiliated companies, provided that such processing shall be carried out only for the purposes specified in this Personal Data Protection Policy.
- 9.3 Disclosure is required by law or legal process, or disclosure is made to competent officers, government officials, or authorities in order to comply with lawful orders or requests.

10. Cross-Border Transfer of Data

The Company may send or transfer personal data overseas and shall ensure that the destination country or destination organization has adequate standards and policies for privacy protection.

11. Retention Period of Your Personal Data

The Company shall retain your personal data only for as long as such data remains necessary for the purposes for which it was collected, as specified in this Policy, relevant notices, or applicable laws. When the retention period expires and your personal data is no longer necessary for such purposes, the Company shall delete or destroy your personal data or anonymize it so that it can no longer identify you, in accordance with the applicable forms and standards for personal data deletion or destruction.

However, in the event of any dispute, exercise of rights, or legal proceedings relating to your personal data, the Company reserves the right to continue retaining such data even after the expiration of the statutory limitation period, such as where legal proceedings are pending and/or until such dispute has been finally resolved by order or judgment.

12. Protection of Personal Data

The Company shall use appropriate technical and administrative measures to protect and maintain the security of your personal data, including encryption for data transmission over the internet and access control to your personal data only by relevant persons, whether such data is stored in paper or electronic form.

13. Links to External Websites or Services

The Company's products or services may contain links to third-party websites or services. Such websites or services may have personal data protection policies with content different from this Policy. The Company recommends that you study the personal data protection policies of such third-party websites or services in detail before using them. The Company is not involved in and has no control over the personal data protection measures of such websites or services, and shall not be responsible for the content, policies, damage, or acts arising from such third-party websites or services.

14. Data Protection Officer

The Company has appointed a Data Protection Officer to examine, supervise, monitor, and provide advice on the collection, use, or disclosure of personal data, including coordinating and cooperating with the Office of the Personal Data Protection Committee (PDPC), in order to comply with the Personal Data Protection Act B.E. 2562 (2019).

15. Your Rights under the Personal Data Protection Act B.E. 2562 (2019)

You may exercise the rights prescribed by law and as specified in this Policy as follows:

- 15.1 Right to withdraw consent: You have the right to withdraw your consent at any time, unless such right is restricted by law or by a contract that benefits you. Withdrawal of consent shall not affect the lawful processing of personal data previously carried out by the Company on the basis of your consent.
- 15.2 Right to access and obtain copies of personal data: You have the right to request access to and obtain copies of your personal data, except where the Company is entitled to refuse your request under the law or a court order, or where your request may adversely affect the rights and freedoms of other persons.
- 15.3 Right to rectification: You have the right to request correction of your personal data so that it is current, accurate, complete, and not misleading. The Company may also carry out such correction even without your request.

- 15.4 Right to erasure, destruction, or anonymization: You have the right to request the deletion or destruction of, or anonymization of, personal data in the following cases:
- (a) where the personal data is no longer necessary for retention in accordance with the purposes of collection, use, or disclosure;
 - (b) where you withdraw your consent to the collection, use, or disclosure of personal data and the Company has no lawful authority to continue processing such personal data; or
 - (c) where you object to the collection, use, or disclosure of personal data and the Company has no lawful authority to refuse such objection, except where the Company has lawful grounds to refuse your request.
- 15.5 Right to data portability: You have the right to request to receive, send, or transfer your personal data where the Company has made such personal data available in a format that is readable or commonly usable by automated tools or equipment and can be used or disclosed by automated means, except where this is technically impossible, where it involves the performance of a duty carried out in the public interest or in compliance with the law, or where the exercise of such right would infringe the rights or freedoms of other persons.
- 15.6 Right to object: You have the right to object to the collection, use, or disclosure of personal data at any time in the following cases:
- (a) where the personal data is processed by the Company on the basis of legitimate interests, unless the Company can demonstrate compelling legitimate grounds, or where processing is for the establishment, compliance with, exercise of, or defense against legal claims;
 - (b) where processing is for direct marketing purposes; or
 - (c) where processing is for scientific, historical, or statistical research purposes, unless the Company has a necessity to perform a task carried out in the public interest.
- 15.7 Right to restriction of processing: You have the right to request suspension of the use of personal data in the following cases:
- (a) where the Company is verifying a request made by you to correct personal data so that it is accurate, current, complete, and not misleading;
 - (b) where the personal data is subject to deletion or destruction;
 - (c) where the personal data is no longer necessary, but you have requested that the Company retain such personal data for the establishment, compliance with, exercise of, or defense against legal claims; or
 - (d) where the Company is verifying its right to refuse your objection to the collection, use, or disclosure of personal data.

15.8 Right to lodge a complaint: The Data Subject may lodge a complaint with the expert committee under the law if the Company violates or fails to comply with the Personal Data Protection Act B.E. 2562 (2019), as described in Section 17 of this Personal Data Protection Policy.

16. Consequences of Non-Compliance with the Personal Data Protection Policy

Failure to comply with this Policy may have consequences as follows: (a) for officers, workers, and employees of the Company, such failure may constitute an offense and may result in disciplinary action under the Company's rules; and (b) for Personal Data Processors, consequences shall be in accordance with the relevant Data Processing Agreement. This shall depend on the case and the relationship with the Company, and may also result in penalties under the Personal Data Protection Act B.E. 2562 (2019), including subordinate legislation, rules, regulations, orders, and other relevant laws.

17. Complaints to Competent Supervisory Authorities

If you find that the Company has not complied with the Personal Data Protection Law, you have the right to file a complaint with the Personal Data Protection Committee or a competent supervisory authority appointed by the Personal Data Protection Committee or under the law. However, before filing such complaint, the Company kindly requests that you contact the Company first so that the Company has an opportunity to acknowledge the facts, provide explanations, and address your concerns at the earliest opportunity.

18. Amendment of the Personal Data Protection Policy

The Company may consider revising, amending, or changing this Policy as it deems appropriate and shall notify you through the website www.bangkokasset.co.th, with the effective date of each revised version indicated. The Company recommends that you regularly review the updated Policy through the relevant activity-specific channels, particularly before disclosing personal data to the Company.

Your continued use of the Company's products or services after the new version of the Policy becomes effective shall be deemed acknowledgment of the terms of such new Policy. If you do not agree with the details of this Policy, please stop or refrain from using the relevant products or services and contact the Company to provide further clarification.

19. Contact for Inquiries or Exercise of Rights

If you have any questions, suggestions, or concerns regarding the Company's collection, use, or disclosure of personal data, or regarding this Policy, or if you wish to exercise your rights under the Personal Data Protection Law, you may contact:

Data Controller

Bangkok Asset Intergroup Public Company Limited

Data Protection Officer and/or Personal Data Protection Working Group, if any

Office Address : No. 99, Soi Ngamwongwan 47, Yaek 42 (Chinnakhet 2/40), Thung Song Hong Sub-district, Lak Si District, Bangkok

Telephone : 02 494 9187

Email : dpo@bangkokassets.com

Website : www.bangkokassets.com and www.bangkokasset.co.th

Please provide the following information when exercising your rights as a Data Subject:

- (1) name and surname, national identification card number/passport number;
- (2) questions concerning personal data or the rights you wish to exercise under the law; and
- (3) telephone number, email address, and address through which you can be contacted.

For general acknowledgment and to ensure consistent implementation, the Company hereby announces the adoption of this Personal Data Protection Policy, which shall be effective from [December 13, 2025](#), onwards.

Announced on [December 13, 2025](#).

Signed - [Mr. Siripol Yodmuangcharoen](#) -

(Mr. Siripol Yodmuangcharoen)

Chairman of the Board of Directors