

Personal Data Protection Policy

For Kiatnakin Phatra Financial Group

As Kiatnakin Phatra Financial Group (“KKPFG”) acknowledges the importance of the protection of personal data, we are enforcing this Personal Data Protection Policy to govern the companies under KKPFG to be in accordance with the related Personal Data Protection Laws, including its sub-regulations, official guidelines and interpretation issued by the regulators and relevant associations (“Personal Data Protection Laws”). This Personal Data Protection Policy has been approved by the highest-level Committee of our organization to set a standard practice for KKPFG, to achieve the following purposes:

- To serve as the core policy which KKPFG and the companies under KKPFG shall comply strictly to be in accordance with the Personal Data Protection Laws
- To ensure that businesses under KKPFG are provided in accordance with the Personal Data Protection Laws and international standards relating personal data protection
- To ensure that businesses under KKPFG are provided in accordance with business conduct and good corporate governance

The Personal Data Policy for KKPFG is comprises of 12 Chapters hereunder.

Chapter 1 Role and Responsibility

Roles and responsibilities of each department under KKPFG:

1. To emphasize, comply, and assemble internal policies, rules, procedures, guidelines, or operation manual (“Internal Policies”) for internal supervision, communication, and operation in accordance with the Personal Data Protection Laws.
2. To set a standard for internal work-process including IT support for personal data protection in accordance with Personal Data Protection Law and KKPFG’s Internal Policies.

Roles and responsibilities of KKPFG’s employees:

1. To emphasize, comply, and cooperate in attending internal courses for basic knowledge relating to Personal Data Protection Laws and KKPFG’s Internal Policies.
2. To immediately report any personal data breach to the assigned supervisor and PDPA Team for further investigation on such incident.
3. To not violate or breach any personal data confidentiality obligations, except otherwise permitted by laws.

www.kkpg.com

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Chapter 2 Collection, Usage, or Disclosure of Personal Data

1. To collect, use, or disclose any relevant personal data as strictly necessary and required under the scope informed to the data subject, and shall be conducted with lawful basis as prescribed under the Personal Data Protection Laws.
2. To set the roles, responsibilities, and procedure for the operations between KKPFPG and counter parties, service providers or business partners whether as a Data Controller or Data Processor, which shall ensure their ability to comply with Personal Data Protection Laws.

Chapter 3 Consent and Consent Withdrawal

1. In the case where consent is required to be given by the Data Subject prior any collection, usage or disclosure, KKPFPG will ensure that such consent is given in accordance with the Personal Data Protection Laws. In addition, in case where the Data Subject requests to withdraw their given consent, KKPFPG will inform the consequences and process to confirm such withdrawal request in accordance with the Personal Data Protection Laws.
2. In the case where the Data Subject requests to withdraw their given consent, KKPFPG will verify and process such withdrawal request without undue delay, unless such withdrawal request is not permitted by the laws. The consent withdrawal shall not affect any collection, usage, or disclosure of the Data Subject's personal data prior to the approval of such withdrawal.
3. The Data Subject's consent and consent withdrawal shall be provided through any medium such as in the form of consent letter, voice record, or electronic channels that can be recorded or stored as evidence to verify such given consent or consent withdrawal,

Chapter 4 Privacy Notice

To monitor, revise, and update the content of KKPFPG's Privacy Notice by ensuring that the collection, usage, or disclosure of personal data is up-to-date and in accordance with the Fairness, Purpose Limitation, Consent, and Legitimate Interest principles and shall be record for audit purposes.

In addition, please see KKPFPG's Privacy Notice for more information at <https://www.kkpfpg.com/th/dataprotection>

Chapter 5 Data Subject's Rights Support

1. To set the methods, measures, and process to support when Data Subject submit request(s) to exercise their rights as permitted in accordance with the Personal Data Protection Laws. KKPFPG will support the request to exercise such rights without any undue delay.
2. To keep record and details of the Data Subject's rights requested, approved, or denied, which shall be provided to the Personal Data Protection Committee or Data Subject upon request.

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Chapter 6 Retention Period

1. KKPFPG will store the related parties' personal data only for a period necessary for the purposes of providing services or conducting business relations with such related parties.

In addition, KKPFPG reserves the right to retain the related parties' personal data as permitted by laws or as required under KKPFPG's Internal Policies for a specific purpose.

2. KKPFPG will destroy or erase the related parties' personal data once the purpose of the collection, usage, and disclosure is fulfilled, no longer necessary for KKPFPG to retain, or any other circumstances where the Personal Data Protection Laws permitted.

Chapter 7 Data Security and Data Governance Measures

KKPFPG has established measures to ensure KKPFPG's data security and data governance level are in compliance with the standards relating to Personal Data Protection Laws for both offline and online, and to ensure that the related parties' personal data are not lost, damaged, or access without authorization.

In addition, KKPFPG will revise, update, and upgrade the data security and data governance measures as deemed necessary or where there are any revision of the Personal Data Protection Laws or other related applicable laws, to ensure that KKPFPG is in compliance with the latest standard of data security and data governance.

Chapter 8 Data Breach Notification

KKPFPG has establish the guidelines and process for reporting personal data breach or data leak incident. In case where KKPFPG has evaluated that such data breach incident may potentially harm the Data Subject's freedom and rights, KKPFPG's Data Protection Officer will further report such data breach incident to the Personal Data Protection Committee ("PDPC") without any undue delay.

Chapter 9 Data Protection Officer

KKPFPG has appoint a Data Protection Officer ("DPO"), whom is an independent person, with a well-rounded understanding of the Personal Data Protection Laws, including international standards on personal data protection, and may report directly to the highest-level executive. DPO is obliged to uphold the confidentiality obligations regarding the personal data obtained from acting as KKPFPG's DPO.

Chapter 10 Risk Management and Data Protection Impact Assessment

KKPFPG has established the process for risk management on products, services including service channels offered by KKPFPG, including the evaluation of personal data breach risks to provide risk mitigation plans prior to the launching of such product, services or service channels and routinely monitor evaluation afterwards. In

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addition, KKPFPG may conduct Data Protection Impact Assessment (“DPIA”) in accordance to the guidelines on evaluating the impacts relating to KKPFPG’s protection of personal data as deemed necessary.

Chapter 11 Internal Audit on Personal Data Protection

KKPFPG’s Internal Audit Department will annually conduct an internal audit on the conduct and work-process relating to the protection of personal data within KKPFPG, and will directly report to the DPO and/or the highest-level supervisor committee.

Chapter 12 Internal Training on Personal Data Protection

KKPFPG has established training and development courses for all employees to provide and ensure the understanding of personal data protection and prevent any personal data breach, personal data leak, or any other incident that may affect the related parties’ personal data. It is mandatory for all new employees to complete such courses and exams within the probation period, and yearly assessment on personal data protection understanding afterwards.