

#### **Privacy Notice**

for

#### **Employees**

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This privacy notice ("Notice") is being provided to you to know about the employees (hereinafter referred to as the "Processing Activities") has acknowledged and understood the pattern of collection, use and disclosure ("processing") of personal data by Sinwattana Crowdfunding Corporation Co., Ltd. ("Sinwattana" or "we"), acting as a data controller. By reading and understanding this Notice, the contracting party involved in this Processing Activity will be aware of the pattern of collection, use, and disclosure of their personal data by Sinwattana, which is collected for the purpose of this Processing Activity.

Sinwattana Crowdfunding Corporation Company Limited is a platform that provides services in the field of being an intermediary of raising funds. Offering shares outside the market that serve between Individuals or juristic persons who are interested to invest in ordinary shares or preferred shares (Investors) and companies (Limited) registered in Thailand (Issuer). It is under the supervision of the Securities and Exchange Commission (SEC) in accordance with the legal process.

In this regard, we proceed with the collection, use or disclosure of your personal data as follows:

#### 1. Legal basis for processing personal data

We collect your personal information under the following bases:

- 1.1 Contractual binding
  - Employment Contract
- 1.2 The need to protect the legitimate interests of Sinwattana or others is equally important as safeguarding the fundamental rights of the data subject. This includes storing usage information for the convenience of work and for maintaining the security of the office.
- 1.3 The need to execute the duties defined by law.

#### 2. Purpose of collecting your personal data

We collect your personal data for the following purposes:

- 2.1 To consider the qualifications, skills, knowledge, and abilities of applicants in accepting work as well as entering into a contract.
- 2.2 To manage the salary for you
- 2.3 To manage and take action related to your welfare and benefits.
- 2.4 To comply with the laws of for regulating body.

## 3. Personal data we collect and use

3.1 Data sources and items of personal data collected are as follows:

Source/Collecting method	Personal Information
Collect information directly from you through an application form.	<ol> <li>Full name, Nickname</li> <li>Date of Birth</li> <li>Gender</li> <li>Photo (legitimate)</li> <li>Race</li> <li>ID number</li> <li>Address</li> <li>Telephone Number</li> <li>Contact of secondary person</li> <li>Military status</li> <li>Education background</li> <li>Training record</li> <li>Work experience</li> <li>Copy of bank account</li> <li>Copy of ID card</li> <li>Transcript</li> <li>Copy of House Registration (Only the page with the name of employee)</li> </ol>
	18. Salary slip 19. Disability (if any) 20. Signature
2. Collect from you when resign.	<ol> <li>Reason to resign</li> <li>Address that can be contacted</li> <li>Signature of employee</li> <li>Signature of Supervisor</li> </ol>

## 3.2 Purposes

Purposes of using information	Personal Information
1. To consider the qualifications, skills, knowledge, and abilities of applicants in accepting work as well as entering into a contract.	<ol> <li>Full name, nickname</li> <li>Date of Birth</li> <li>Gender</li> <li>Photo</li> </ol>

	<ol> <li>Race</li> <li>ID number</li> <li>Address</li> <li>Telephone Number</li> <li>Contact of secondary person</li> <li>Military status</li> <li>Education background</li> <li>Training record</li> <li>Work experience</li> <li>Family information</li> <li>Disability</li> </ol>
2. To manage the salary for you such as issue salary slip, etc.	Full name     Bank account number
3.To manage your Social Security	<ol> <li>Full name</li> <li>Address</li> <li>Telephone Number</li> <li>ID number</li> </ol>
4.To provide you the group insurance	<ol> <li>Full name</li> <li>Address</li> <li>Telephone Number</li> <li>ID number</li> </ol>
5.To apply to be a member of a provident fund	<ol> <li>Full name</li> <li>ID number</li> <li>Date of Birth</li> </ol>

# 3.3 Disclosure

Purposes of disclosure	Personal Information
1.Your personal information will be used	1. Full name, nickname
internally only by officers from the Human	2. Date of Birth
Resource department.	3. Gender
	4. Photo
	5. Race
	6. Address
	7. Telephone Number
	8. Contact of secondary person
	9. Military status
	10. Education background
	11. Training record
	12. Work experience
	13. Family information

2. Your personal information will be disclosed to the Social Security Office to prepare social security for you	<ol> <li>Full name</li> <li>Address</li> <li>Telephone Number</li> <li>ID number</li> </ol>
3. Your personal information will be disclosed to insurance companies to provide you a group insurance.	<ol> <li>Full name</li> <li>Age</li> <li>Weight, Height</li> <li>Race</li> <li>ID number</li> <li>Address</li> <li>Full name, address of beneficiary</li> </ol>
5. Your personal information will be disclosed to asset management companies to apply to be a member of provident fund.	<ol> <li>Full name</li> <li>ID number</li> </ol>
5. Your personal information will be disclosed to banks to pay your salary.	<ol> <li>Full name</li> <li>Salary</li> </ol>

## 4. <u>Disclosure of your personal information</u>

We disclose your personal information to the following persons or entities:

- 4.1 Your personal information will be used and disclosed internally only by officers from the Human Resource department.
- 4.2 Your personal information will be used and disclosed internally only by interviewers as well as people who makes a decision to employ.
- 4.3 Your personal information will be disclosed to the Social Security Office.
- 4.4 Your personal information will be disclosed to insurance companies.
- 4.5 Your personal information will be disclosed to asset management companies.

#### 5. Your rights under the Personal Data Protection Act B.E. 2562

Under the Personal Data Protection Act B.E.2562, you have the following rights that you can exercise:

- 5.1. Right of access: You can obtain a copy of your personal information that we have collected and ask us to disclose the source, unless we have the right to deny your request by law, court order, or if your request may damage the rights and freedoms of others.
- 5.2. Right to rectification: You can request us to rectify any inaccurate or incomplete personal data to ensure that it is accurate, current, complete, and not misleading.
- 5.3. Right to request suspension of use: You can request us to suspend the use of your personal data in any of the following cases:
  - 5.3.1. While we verify and correct your personal data to ensure that it is accurate, current, and complete.

- 5.3.2. When your personal data is collected unlawfully or used or disclosed without your consent.
- 5.3.3. When your personal data is no longer needed for the purposes as notified but you require us to keep it to enable you to establish, exercise or defend a legal claim.
- 5.3.4. When we are proving the legitimate grounds for collecting, using, or disclosing your personal data, or verifying the necessity of doing so for public interest, due to your exercise of your right to object to such collection, use, or disclosure.
- 5.4. Right to object: You have the right to object to the collection, use, or disclosure of your personal data, unless we have legitimate grounds to refuse your request (for example, if we can demonstrate that collecting, using, or disclosing your personal data is necessary to establish legal claims or for public interest according to our mission).

#### 6. Retention Period of personal data

- 6.1 In the case that you do not pass the probation, we will retain your personal data for the entire period of the probation and after the end of the contract for the period of 1 year.
- 6.2 In the case that you pass the probation, we will retain your personal data for the entire period of the employment contract and after the end of the contract for the period of 10 years.

However, after the said period, we will delete and destroy such personal data when the use of personal data is no longer necessary.

### 7. Data Security

We have measure on data security of your personal data properly. The original shall be stored in cabinets and there are two people who hold the keys. For the electronic file shall be stored in shared Drive in order to prevent the loss of data or being reached, destroyed, used, altered, edited, or disclosed personal data without permission in accordance with our policy and guideline on information security.

Besides, we have established the personal data protection policy published to throughout the organization including the guideline to collect, use and disclose personal data in order to keep confidentiality, integrity and availability of personal data. We will review policies as well as this Notice within the appropriate period.

#### 8. Participation of Data Subject

At the request of the data subject, their successors, heirs, legal representatives, or guardian, we may disclose personal data. Requests can be made by emailing <a href="mailto:dpo@sinwattana.com">dpo@sinwattana.com</a>.

If the data owner, successor, heir, legal representative, or legal guardian has any objections to the storage, accuracy, or any other actions taken regarding their personal data, we will record the objection as evidence. However, we may deny this right if required by law or if the personal information is anonymized or unidentifiable.

### 9. Responsibilities of individuals processing personal data

Only authorized personnel involved in the collection, use, and disclosure of personal data will have access to your information. We ensure that our staff strictly complies with this announcement.

#### 10. Changes to the Privacy Notice To improve or change this announcement

We may make changes to this announcement as necessary and will notify you by email at dpo@sinwattana.com. The latest version will be marked with a date. We encourage you to check regularly for any updates, especially before disclosing personal information to us.

By accessing our products or services, you acknowledge the terms of this announcement. If you do not agree with the terms, please discontinue use. Continuing to use our products or services after any changes have been made will be deemed as acceptance of those changes.

#### 11. Inquiries

If you have any questions or inquiries regarding this announcement, please contact us at:

#### - Data Controller

- Name: Sinwattana Crowdfunding Corporation Co., Ltd.
- Contact address: 140/17 ITF Tower 11th Floor, Silom road, Suriyawong, Bang Rak, Bangkok 10500
- Contact channel: (+66) 2-233-3723 or E-mail dpo@sinwattana.com

#### Data Protection Officer (DPO)

- Name: Mr. Chayatawat Atiphat
- Contact address: 140/17 ITF Tower 11th Floor, Silom road, Suriyawong, Bang Rak, Bangkok 10500
- Contact channel: (+66) 2-233-3723 or E-mail dpo@sinwattana.com