



Privacy Notice for Contract Management

This privacy notice ("Notice") is being provided to the contracting party involved in contract management such as drafting, reviewing, and amending all contract pertaining to the Company to inform them of the 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 Legal basis

- Hire of work agreement (Collected information such as first name, surname, address to identify a party.)
- Brokerage Agreement (Collected information such as first name, surname, address to identify a party.)
- Service Agreement (Collected information such as first name, surname, address to identify a party.)
- Joint Venture Agreement (Collected information such as first name, surname, address to identify a party.)
- Reviewing of other contract related to the Company (Collected information such as first name, surname, address to identify a party.)

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

We collect your personal data for the following purposes:

- 2.1 To review, edit and draft contracts.
- 2.2 As evidence for auditing if there is any doubt about the contents of contracts, official letters, or documents.
- 2.3 As evidence in the event of a lawsuit and having to enter the justice process.

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
1. Collected from other department such as IT department, marketing department, business development department.	<ul style="list-style-type: none"> 1. Full name 2. Address 3. Competence of person (if any)

3.2 Purposes

Purposes of using information	Personal Information
1. To review, edit and draft contracts	<ul style="list-style-type: none"> 1. Full name 2. Address
2. As evidence for auditing if there is any doubt about the contents of contracts, official letters, or documents	<ul style="list-style-type: none"> 1. Full name 2. Address
3. As evidence in the event of a lawsuit and having to enter the justice process	<ul style="list-style-type: none"> 1. Full name 2. Address

3.3 Disclosure

Purpose of Disclosure	Personal Information
1. Your personal information will be used internally only by our legal department.	1. Full name 2. Address
2. Your personal information will be used internally only by administration department to store contracts.	1. Full name 2. Address

4. Disclosure of your personal information

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

- 4.1 Your personal information will be used internally only by our legal department.
- 4.2 Your personal information will be used internally only by administration department to store contracts.

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

We retain your personal data until such contract or agreement shall be signed. However, after the said period, we shall delete that personal data when it is unnecessary.

7. Data Security

We have measures to maintain the security of your personal information appropriately by means of storing your personal information in Share Drive to prevent data loss. or have unauthorized access, destruction, use, alteration, alteration, or disclosure of personal data This is consistent with our Information Security Policy and practices.

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 dpo@sinwattana.com.

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