



Privacy Notice
for
Issuer Privacy Notice

This privacy notice (“notice”) was made for you as our customer on website (hereinafter referred to the “Processing activity”) acknowledged for the collection, use, or disclosure (“processing”) Sinwattana Crowdfunding Corporation company limited (hereinafter referred to the “Sinwattana Crowdfunding Corporation company limited” or “we”) proceed as Data Controller may obtain or collect your Personal Data.

Sinwattana Crowdfunding Corporation company limited is a platform that provides services in the field of fundraising intermediaries offering for sale of shares outside the market that provides services between individuals or juristic persons who are interested in investing in ordinary shares or preferred shares and companies (limited) registered in Thailand by under the supervision of the Securities and Exchange Commission (SEC).

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 It is necessary for the performance of a contract.

- NDA (Non-disclosure agreement)
- Issuer contract

1.2 It is necessary to compliance with a law (Notification of the Capital Market Supervisory Board no.Tor Jor 21/2562)

- Clause 46 A crowdfunding portal shall exercise due care in making consideration

and undertaking as follows:

- (1) Examining the identity of a company making offer for sale of securities
- (2) Arranging to have the agreement with the company making offer for sale of securities which shall at least require the company making offer for sale of securities to have the duties or to act as follows:
- (3) the duties to disclose sufficient information on the crowdfunding portal before and continuously after offer for sale of securities which can be presented in various kinds of electronic forms but shall be clear, easy to understand and not misleading. The duty

of continuous disclosure after offer for sale of securities may be subject to termination in accordance with the guideline specified by the SEC Office;

2. The purpose of the collection your personal data

We collect your personal data for the following purposes:

- 2.1 Examining the identity of a company making offer for sale of securities.
- 2.2 Disclose sufficient information in accordance with law.

3. Personal data we collect and use

3.1 The Personal Data on which we rely on to collect.

Collecting Method	List of Personal Data	Legal base
1. Collect from investment document	<ul style="list-style-type: none"> 1. Name, Last name of director and shareholder 2. Name, Surname of contact person 	<ul style="list-style-type: none"> 1. Necessary for the performance of contract 2. Necessary to compliance with a law
2. Platform	<ul style="list-style-type: none"> 1. Name, Last name of director and shareholder 2. Name, Surname of contact person 	<ul style="list-style-type: none"> 1. Necessary for the performance of contract 2. Necessary to compliance with a law

3.2 The Personal Data on which we rely on to use.

Purpose	List of Personal Data	Legal base
1. examining the identity	<ul style="list-style-type: none"> 1. Name, Last name of director and shareholder 	<ul style="list-style-type: none"> 1. Necessary for the performance of contract 2. Necessary to compliance with a law
2. Disclose sufficient information on the crowdfunding portal in accordance with law	<ul style="list-style-type: none"> 1. Name, Last name of director and shareholder 	<ul style="list-style-type: none"> 1. Necessary for the performance of contract 2. Necessary to compliance with a law

3.3 The Personal Data on which we rely on to disclose.

Purpose of disclosure	Personal data	Legal base
1. disclose to business department	<ul style="list-style-type: none"> 1. Name, Surname of director and shareholder 2. Name, Surname of contact person 	<ul style="list-style-type: none"> 1. Necessary for the performance of contract 2. Necessary to compliance with a law
2. disclose to SEC	<ul style="list-style-type: none"> 1. Name, Surname of director and shareholder 	<ul style="list-style-type: none"> 1. Necessary for the performance of contract

	2. Name, Surname of contact person	2. Necessary to compliance with a law
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4. Disclosure of your personal data

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

- 4.1 Your Personal Data will be disclosed to the business team.
- 4.2 Your Personal Data will be disclosed to SEC.

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 your personal data

We will retain your personal data for 10 years from the time we receive the data or until the data subject has an order to destroy or delete from the database. This 10 years period is the maximum period according to the law because the retention period is not defined.

When the period has elapsed, we shall we shall anonymize your Personal Data for proceed some activity such as analytic statistic, operation improvement, important public interest, etc.

7. Data Security

We maintain appropriate security measures for Personal Data, we collect your personal on business department's Microsoft Team encrypted by password and stored on AWS platform against any accidental or unlawful or unauthorized loss, access, use, alteration, collection, or disclosure of Personal Data, in compliance with the Information Security Policy.

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. The participation of data subject

We shall disclose your Personal Data when we receive request from data subject, successor, heir, legal representative, guardian, or curator by send the request through email dpo@Sinwattana.com

In case the data subject, successor, heir, legal representative, guardian, or curator object the collection, we shall record the evidence of object request.

We may deny the right in paragraph 2 due to the law stipulates or your Personal Data is anonymous.

9. Review and adjust the policy

We may review and edit this notice. We shall inform you of the newly issued notice in which the last version stipulated to you through email dpo@Sinwattana.com However, please read the newly issued notice before you disclose your Personal Data.

10. Contact detail for question

- **Data Controller**
 - Name: Sinwattana Crowdfunding Corporation company limited
 - Address: 140/17 ITF Tower 11th Floor, Silom road, Suriyawong, Bangrak, Bangkok 10500
 - Contact number: (+66) 2-233-3723 / E-mail dpo@Sinwattana.com
- **Data Protection Officer: DPO**
 - Name: Mr. Chayatawatch Atibaedya
 - Address: 140/17 ITF Tower 11th Floor, Silom road, Suriyawong, Bangrak, Bangkok 10500
 - Contact number: (+66) 2-233-3723 หรือทาง E-mail dpo@Sinwattana.com