Latest Updated: 23/05/2022



Privacy Notice

For

Investor Members

This privacy notice ("Notice") is provided to you, a member on the platform of Sinwattana Crowdfunding (hereinafter referred to as the "Processing Activities")know and understand the pattern of collection, use and disclosure ("processing") of personal data that the Company Sinwattana Crowdfunding Corporation Company Limited (hereinafter referred to as "Sinwattana Crowdfunding Corporation Company Limited" or "we") operates as a data controller in personal data collected from you for the processing 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 The necessity for the performance of legal duties.

2. Purpose of collecting your personal data

We collect your personal data for the following purposes:

- 2.1 To help you to use the service on the company's platform with limited access to various information.
- 2.2 To provide the ID and Password of General Membership in order to subscript as an issuer offering securities or an investor.
- 2.3 To receive news about the activities of the company.

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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 from you directly through the Sinwattana crowdfunding platform	 Full name Email Address Telephone Number Address Copy of Bank Account Face picture along with ID Card
	(Sensitive Data)

3.2 Purpose

Purposes of using personal information	Personal Information
1. To verify the identification	 Full name Email Address Telephone Number Address Bank Account
2. To collect information of securities offerings to relevant authorities in the process of operation	 Full name Email Address Telephone Number Address Bank Account
3. To contact and send public relations media to notify you about fundraising news.	 Full name Email Address Telephone Number

3.3 Disclosure

Disclosure of personal information	Personal Information
1. Your personal information shall be used internally only by business department.	 Full name Email Address Telephone Number
2. Your personal information shall be disclosed to an issuer (If the offering is successful only)	 Full name Email Address Telephone Number Address Bank Account

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3. Your personal information shall be disclosed to The Securities and Exchange Commission (SEC)	 Full name Email Address Telephone Number Address Bank Account
4. Your personal information shall be disclosed to the Escrow Agent (Kasikorn Thai Bank)	 Full name ID number
	Face picture along with ID Card (Sensitive Data)
5. Your personal information may be disclosed publicly through the channels that you provide. If you have a subscription and make a payment to your Escrow account, Sinwattana's platform will display the reservation amount and list of reservations. When sharing your subscription, you have the option to reveal or conceal your identity.	 Full name Telephone Number Email Address

4. Disclosure of your personal information

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

- 4.1 Your personal information shall be used internally only by business department.
- 4.2 Your personal information shall be disclosed to issuer only in case that the fundraising is successful.
- 4.3 Your personal information shall be disclosed to The Securities and Exchange Commission, Thailand (SEC)only in case that the fundraising is successful.
- 4.4 Your personal information shall be disclosed to Escrow Agent (Kasikorn Thai Bank)
- 4.5 Your personal information shall be disclosed to the public through you channels in the event that you have a reserve the securities and transfer a reserve payment escrow account, the reservation amount and list of reservations shall be displayed on Sinwattana's platform. Thus, you have right to choose to reveal or not to reveal your identity in that offering reservation.

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 will retain your personal data for the entire period of membership, and we will retain for 5-10 years from the time a member cancels the membership. Only for the copy of ID card, we will retain for 3 working days, then we will destroy immediately.

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 have measures to maintain the security of your personal information appropriately by means of storing your personal information in MS Team encrypted by password and will be stored in AWS database 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.

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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