

Personal Data Protection Policy of BMEX LTD. (“BMEX”)

1. Rational Criterion

BMEX Ltd. (“BMEX”) recognizes the importance on the protection of personal data and obligations to perform its duties as prescribed under the Personal Data Protection Act B.E. 2562 (2019) (the “Personal Data Protection Act”). The Personal Data Protection Act lays down the rights and obligations of the company in collecting, using and disclosing the personal data of persons related to our business operations. This Personal Data Protection Policy (“Policy”) has been established to illustrate how we, as the data controller, will manage the personal data of customers, business partners, employees and other third parties.

2. Definition

- **“Data Subject”** means any individual person who is the owner of the personal data in accordance with the Personal Data Protection Act B.E. 2562 (2019).
- **“Personal Data”** means any information which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased person in particular.
- **“Data Processing”** means the collecting, using, and disclosing of Personal Data in accordance with the Personal Data Protection Act B.E. 2562 (2019).

3. Collection of Personal Data

3.1 Personal Data to be collected by BMEX

We collect various Personal Data by taking into consideration the purpose of using such data according to our normal business operations, which may include:

- a. General data e.g., first name and last name, telephone number, email address, residential address, identification number of individual person (e.g., ID card, passport, driver’s license and tax identification number), date of birth, nationality, citizenship, weight, height, and photo.
- b. Data on career, education, employment history, employment performance evaluation, criminal record, medical history, and family history.
- c. Historical data on any transaction(s) or contract(s) entered into with us.
- d. Bank account number, salary, financial status, tax payment history, credit card number, and vehicle license plate number

- e. Data on the Data Subject's use of computer and program, including IP address, type of browser, language, operating systems, applications, website usage history, and cookies.
- f. Recorded CCTV footage.

3.2 Personal Data Collection Channel

We may collect the Data Subject's Personal Data, whether directly or indirectly, through the following channels:

- a. Data that has been directly provided to us or our representative by the Data Subject or their representative;
- b. Data that has been lawfully obtained from MBGM including such companies' subsidiaries, affiliates or business partners.
- c. Data obtained from any other reliable sources, such as government agencies and banks; and
- d. Data obtained from general public in a lawful manner.

4. Personal Data Retention Period

We will collect and retain the Personal Data only for a period necessary for processing such Personal Data within the scopes and purposes related to our business operations. After such period has ended, we will destroy such Personal data pursuant to the standard methods, unless we have legal obligation to continuously retain such data or to protect our rights as specified by the law.

5. Purpose of Processing and Disclosure of the Personal Data

5.1 Purpose of Processing and Disclosure of the Personal Data

We will use and disclose the Personal Data for the purpose of carrying out the normal course of our business operations, which includes:

- a. For entering into a contract or performing duties under a contract between us and the Data Subject.
- b. For business operation necessary for our legitimate interest (Legitimate Interest) by taking into account the basic rights of the Data Subject.
- c. To offer information about products and services as well as to improve, develop and to maintain the quality of products and services that the Data Subject is partnering with us.
- d. For communications such as notification services and receiving a response when the data subject has contacted.

- e. To offer new products and services. In the event that the Data Subject does not wish to be notified of the marketing or sales activities, the Data Subject can notify his/her intention to us through the channels specified by us.
- f. For the purpose of recruitment and selection of human resources.
- g. To identify persons who come into contact with us and for security purposes.
- h. To perform our various duties under relevant laws.

5.2 Disclosure of Personal Data

We may disclose Personal Data of the Data Subject under lawful basis. Such data of the Data Subject may be disclosed or transferred to government agencies or third party, which includes:

- a. Companies' subsidiaries and affiliates;
- b. Third-party service provider, such as service providers who collect and analyze data or human resources service provider.
- c. Government agencies relevant to our business operations.
- d. Advisors, such as financial advisor or legal advisor.
- e. Other data controller that the Data Subject requests us to send or transfer Personal Data to.

We will carry out necessary procedure to ensure the protection and prevention of the Personal Data from any loss of data, the unauthorized access to, unlawful use, modification, or disclosure of information by the person mentioned above.

If we must disclose the Personal Data to the receiver in a foreign country, we will disclose the Personal Data only to the extent permitted by the Personal Data Protection Act and other related laws.

6. Data Protection

We have a standardized data security system that categorizes and determines the level of data secrecy, by determining how to manage data, the right to access data, maintaining physical and environmental security within the organization, and establishing operational procedures related to the processing of information and communication devices in order to ensure that the information processed by it are secured and protected from any breaches of Person Data.

7. Rights of Data Subject

The rights of the Data Subject are as follows:

- Rights to receive notification when we collect their Personal Data.
- Rights to access their own Personal Data, request for copies of their Personal Data, request us to disclose the source in which the Personal Data was obtained from.
- Rights to receive or request us to send or transfer Personal Data to another data controller if it can be done by automatic means.
- Rights to object the collection, use, or disclosure of their Personal Data.
- Rights to request us to erase or destroy or anonymize the Personal Data.
- Rights to request us to cease the use of their Personal Data.
- Rights to request us to ensure that their Personal Data are accurate, up-to-date, complete, and not misleading.

8. Communication

We have appointed the Data Protection Officer, who is responsible for providing advice and coordinating with the Data Subject in accordance with the Personal Data Protection Act.

Contacting details are, as follows:

Data Protection Officer: PDPA Team

Email: papd@bmex.co.th

Telephone No. +66 (0) 2-077-5668

9. Policy Review and Update

We will regularly review and update this policy at least once a year or whenever any significant changes regarding legal issues, related personnel, and our business operations, in order for the policy to be in compliance with the laws and practices of the regulatory agencies.

This Policy is effective as from [26 August 2024]