



## Privacy Notice for the Shareholders' Meeting

---

Bangkok Commercial Asset Management Public Company Limited (hereinafter referred to as “the Company”) attaches high priority to and respects the privacy right and safeguards the personal data of each shareholder, attorney, or proxy (“you”). The Company has established a policy, measures and guidelines, and taken stringent precautions for the security of your personal data so that you can rest assured of the Company’s use of your personal data according to the stated purposes and rightfully according to the laws. The Company hereby provides you with details of the Company’s collection, use and/or disclosure (collectively referred to as “processing”), as well as deletion and destruction of your personal data, via online channel and/or channels otherwise as prescribed by the law on personal data protection, as follows:

### **1. Personal data collected, used and/or disclosed and sources of data**

#### **1.1 Personal data collected, used and/or disclosed by the Company**

The Company will collect your personal data for the benefit of the holding of the shareholders’ meeting and attendance of the meeting, comprising name, surname, age, date of birth, citizen identification number, passport number, tax-payer number, securities holding registration number, deposit account number, contact details such as residing address, workplace, telephone number, facsimile number, email address, voice recording, photo, video and any other data regarded as personal data under the personal data protection law.

#### **1.2 Sources of personal data**

The Company will collect personal data directly from you and/or may collect personal data received from the securities registrars, such as Thailand Securities Depository Company Limited, etc., only in case necessary by the methods prescribed by the laws.

### **2. Purposes and legal bases for processing your personal data**

The Company will process your personal data only as necessary and for the legitimate purposes or on the lawful bases as below:

Processing purposes	Legal bases
1. To call and proceed with a shareholders' meeting, personal identification, sending of relevant documents and any proceeding in compliance with the laws, e.g., Public Limited Companies Act, B.E. 2535 (1992), Civil and Commercial Code, Securities and Exchange Act, etc., and any other relevant laws.	As legal obligation.
2. To serve the Company's administration purposes, such as preparation of meeting minutes, meeting audiovisual broadcasting, still or moving images as well as voice recordings of the meeting for use as meeting evidences, public relations via print and electronic media, maintaining of meeting security, arrangement of activities, sending of any updates or any offers for your benefits, and so on, as well as for any other activities as necessary taking into consideration the fundamental rights in respect of your personal data and up to the extent you may expect reasonably.	As necessary for legitimate interest of the Company.

**3. Disclosure of your personal data**

It is necessary for the Company to perform in compliance with the relevant laws which require the Company to disclose personal data under the duties prescribed by law to government agencies and regulators, as well as probably to any other relevant individuals or agencies under the purposes specified in this Privacy Notice, such as Bank of Thailand, Ministry of Commerce, Office of Securities and Exchange Commission, Stock Exchange of Thailand, Thailand Securities Depository Company Limited, the courts, data processors, third-party service providers, legal authorities, and so forth. The Company will arrange to ensure that the parties or agencies to whom your personal data is provided will collect, use and/or disclose your personal data within the scope and for the purposes specified in this Privacy Notice.

#### **4. Your rights in the capacity of personal data subject**

As the personal data subject, you will have the following rights according to the laws:

4.1 Right to access to data: You may request to access your personal data retained by the Company and may request to get copies of such data.

4.2 Right to rectification: You may inform the Company to correct your personal data if such personal data is found incorrect or incomplete.

4.3 Right to erasure: You may request the Company to delete your personal data if it is found no longer required to be used by the Company.

4.4 Right to prohibit processing of personal data or right to object to processing of personal data: You may request the Company to suspend or terminate processing of your personal data.

4.5 Right to withdraw consent: If you have already given consent to the Company's processing of your personal data for any matter, you may revoke such consent at any time.

4.6 Right to data portability: You may request the Company to send copies of your personal data retained by the Company to any other personal data controller in the structured, generally-used and computer-readable form.

Your exercise of any of the above rights may be restricted by the relevant laws, and in some necessary cases where the Company may reject your request or be unable to proceed with your request to exercise the above rights under such circumstances as necessity to abide by the laws or court orders, or to perform for public interests, or if such exercise of right could lead to violating the right or freedom of any other person, and so on. In case of rejection of your request, the Company will notify you of the reasons for the rejection.

In case you are notified of the rejection of your request to exercise the above rights or the Company is considered having performed in violation of or failing to comply with the Personal Data Protection Act, you may lodge a complaint with the Company's work unit handling complaints or the regulators according to the laws.

#### **5. Personal data storage period**

The Company will keep your personal data for a period as necessary and for the purpose of processing as stated in this Privacy Notice throughout the duration of your status as the Company's shareholder as specified in the Company's regulation. The storage of such personal data may be required for a further period of time if prescribed by law. Upon the end of the personal data storage period or in case of no need to keep it for further use, the Company will implement appropriate procedures to delete or destroy such personal data or make it unidentifiable in respect of data subject.

#### **6. Personal data security measures**

The Company has in place measures to properly maintain security of your personal data in both technical and managerial terms in order to prevent data loss, or access to, deletion, destruction, use, change, alteration or disclosure of such personal data without your permission. This is in line with the Company's policy, measures and practice guidelines for information and cyber security.

In addition, the Company has established the personal data protection policy for acknowledgment across the organization along with the practice guidelines to ensure stability and safety in the collection, use or disclosure of personal data on the basis of confidentiality, integrity and availability. The policy and this Privacy Notice are set to be reviewed as considered necessary and appropriate.

#### **7. Responsibilities of personal data controller**

Only relevant officers with authority to collect, use or disclose personal data for this processing activity are designated by the Company to access your personal data. The Company will arrange to ensure that the designated officers will strictly comply with this Privacy Notice.

#### **8. Revision of the Privacy Notice**

To update or amend this Privacy Notice, the Company may consider and make amendment as deemed appropriate, and will notify you of such amendment together with the date of the latest version via the Company's website. However, you are recommended to check out the latest version on a regular basis.

## 9. Contacts

For enquiries or further information on collection, use and/or disclosure of your personal data, as well as request to exercise the rights pursuant to this Privacy Notice, you may contact the Company and/or data protection officer via the following channels:

### 1. Data controller

- Name: Bangkok Commercial Asset Management Public Company Limited
- Address: 99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500
- Contact channel: Tel. 0-2630-0700 ext. Office of Company Secretary

### 2. Data protection officer (DPO)

- Address: 99 Surasak Road, Silom Sub-district, Bangrak District, Bangkok 10500
- Contact channel: Email: [dpo@bam.co.th](mailto:dpo@bam.co.th)

Announced on 8 April 2022