

Privacy Notice

UOB Asset Management (Thailand) Company Limited (“**Company**”) advises that you get to understand this privacy notice as we realize the importance of our customer’s personal data protection. This policy explains the procedures that the Company treats your personal data, e.g. collection, retention, use, disclosure of and your rights relating personal data, etc. To ensure you have been aware of such information, the Company publishes the privacy notice as follows.

1. Definition

“**Company**” means UOB Asset Management (Thailand) Company Limited

“**You**” means a natural person who is an owner of personal information.

2. Personal data collected, used and/or disclosed by the Company

Personal data means any information relating to a person, which enables the identification of such person, whether directly or indirectly, namely;

- Identity data: means any information concerning a person, which enables your identification, whether directly or indirectly, such as given name, date of birth, gender, nationality, copy of identification card or passport, marital status, etc.
- Customer contact data: such as residential address, work address, telephone number, email, Line I.D.
- Sensitive data: such as racial, religious, health data, biometric data (such as facial recognition data, fingerprint recognition data, iris recognition data, voice recognition data for the purpose of verification and authentication of applicant), criminal records or relevant legal offenses, including any other information in the similar manner, etc.
- Information of beneficiaries such as joint applicants, joint unitholders and minor beneficiaries of the Company’s products and services

- Financial and transaction data: such as account number and monthly income, payment data and tax data, etc.
- Information relating your use of the Company's products and services, such as online investment transaction service, automatic account debit
- Information relating products and services you have with the Company's marketing partners or affiliates, such as insurance policies, bank deposits, savings, investments or financial products and services
- Technical and usage data: IP Address, website browsing data obtained from cookie ID settings, platforms and other technologies employed in accessing the Company's website
- Marketing and communication data: your preferential setting in receiving marketing information from the Company and third parties, including your communicative interaction with the Company, such as recording of voice or activity of customers who reach the Company via contact center, email or other social media, etc

The Company will collect personal data only on the parts that are necessary to the provision or offering of products or services that you demand or use. In case where you fail to provide the information that is necessary, it may affect the service the Company renders to you or the Company may not be able to comply with its contractual obligation it has with you; and it may also affect the compliance with any laws that the Company is abide to and lead to relevant sanctions under the law.

The personal data that the Company collects, uses or discloses is received from you or other sources that are reliable, such as government agencies, third parties relevant to you (such as employer, joint account owner, etc.), business partners, affiliated companies, etc., provided that the Company may collect information from other sources only where your consent is obtained, as required by law, except where it is necessary under the permission of law.

Moreover, the Company may collect, use and disclose the aggregated data that derives from your personal data, provided that such information shall not be able to identify a person. For example,

the Company may use part(s) of your data obtained through anonymization to create the statistical data. Above all, the Company fully realizes that the used data must not be able to reuse to identify the person.

3. Limited collection and processing of personal data

3.1 The Company will collect your personal data for your interests in using the products and/or services, including to comply with any relevant laws and other purpose specified in this notice. The Company shall process your data under the lawful grounds as follows.

3.1.1 Consent Basis - the case where you have given the Company consent so that you receive better products and/or services that meet your needs, including:

- to extend your benefits by offering the same type of products or services that you already have with the Management Company and other products or services of the Management Company which may fit, benefit or meet your needs, including to sending you updates, privileges, invitations to join activities, marketing data and/or promotional campaigns that meet or may meet your needs
- to analyze, research and/or develop products or services of the Management Company, including its parent companies, financial groups and/or business partners to meet your needs
- to monitoring, examining and evaluating services or products of the Company

For the above purpose, the Company will manage to make you aware and give consent in writing through electronic means, short message service (SMS) or any channel it sees fit.

3.1.2 Contract basis – to use in data processing that is necessary for the performance of a contract. The Company will comply with the internal process to fulfill the objective of the contract, so that you could use products and/or services of the Company as a counterparty to the contract.

3.1.3 Legal obligation basis – to conduct data processing as required by law, such as compliance with order of official authorities under the law, compliance with the laws relating financial institution business, the Securities and Exchange Act, the Anti-money Laundering Act, the Counter-terrorism and Proliferation of Weapon of Mass Destruction Financing Act and other relevant laws.

3.1.4 Public task basis – the Company may conduct data processing that is necessary for the performance of a task carried out in the public interest; or it is necessary for exercising of official authority vested in the Company.

3.1.5 Legitimate Interest basis – for legitimate interests, such as internal management, risk management, supervision, security and customer relationship management.

3.2 To achieve the purpose relating the preparation of historical documents or archives for public interest, or for the purpose relating research or statistics, in which the suitable measures to safeguard your rights and freedoms are put in place. Provided as required by law, the Company shall not collect your sensitive personal data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may affect you in the same manner, as prescribed by the Committee, without your explicit consent, except where:

3.2.1 it is to prevent or suppress a danger to life, body or health of the Person, w h e r e the data subject is incapable of giving consent by whatever reason;

3.2.2 it is carried out in the course of legitimate activities with appropriate safeguards by the foundations, associations or any other not-for-profit organizations with a political, religious, philosophical, or trade union purposes for their members, former members of the bodies, or persons having regular contact with such foundations, associations or not-for-profit organizations in connection with their purposes, without disclosing the Personal Data outside of such foundations, associations or not-for-profit organizations;

3.2.3 it is information that is disclosed to the public with your explicit consent;

3.2.4 it is necessary for the establishment, compliance, exercise or defense of legal claims;

3.2.5 it is for the benefit of an investigation of an inquiry official, or a trial in court;

3.2.6 it is necessary for compliance with a law to achieve the purposes with respect to:

3.2.6.1 preventive medicine or occupational medicine, the assessment of working capacity of the employee, medical diagnosis, the provision of health or social care, medical treatment, the management of health or social care systems and services. In the event that it is not for compliance with the law, and such personal data is under the responsibility of the occupational or profession practitioner or person having the duty to keep such personal data as confidential under the law, it must be for compliance with the contract between you and the medical practitioner;

3.2.6.2 public interest in public health, such as protecting against cross-border dangerous contagious disease or epidemics which may be contagious or pestilent, or ensuring standards or quality of medicines, medicinal products or medical devices, on the basis that there is a provision of suitable and specific measures to safeguard your rights and freedom, in particular maintaining the confidentiality of personal data in accordance with the duties or professional ethics;

3.2.6.3 employment protection, social security, national health security, social health welfare of the entitled person by law, the road accident victims protection, or social protection in which the collection of personal data is necessary for exercising the rights or carrying out the Data Controller's or your obligations, by providing the suitable measures to protect your fundamental rights and interest;

3.2.6.4 it is for the scientific, historical, or statistic research purposes, or other public interests which must be carried out only to the extent necessary to achieve such purposes, and the suitable measures have been provided to protect your fundamental rights and as prescribed by the Committee;

3.2.6.5 the substantial public interest, by providing the suitable measures to protect your fundamental rights and interest.

4. Purposes of collection, use and disclosure of personal data

4.1 The Company collects, uses and discloses your personal data for the operation of the Company to:

- (a) provide services relating the products of the Company that you have used currently;
- (b) conduct research and analysis for improvement or development of the existing services or products of the Company or that the Company may offer you in the future, which may result that you receive better services or products that fit you and/or could meet your needs;
- (c) manage your and/or the Company's risks;
- (d) conduct or promote marketing activities and/or sale promotion, including publicize the Company's products or services;
- (e) monitor, examine and/or evaluate the services or products of the Company;
- (f) comply with other laws.

4.2 Later on, in case where there is change to the purpose for which the personal data is collected, the Company shall keep you informed and further seek your consent.

5. Limitation of use and disclosure of personal data

5.1 The Company may use and/or disclose your personal data if your consent is obtained or if it is permitted under the law, provided that such use and/or disclosure must be only for the purpose of the collection and retention of data of the Company.

5.2 The Company will supervise the operating officers of the Company that they will not collect, use, disclose or display in any other manner your personal data other than for the given purpose or to any third parties, except where it is permitted under 4.1 and 4.2.

5.3 In some cases, the Company may designate a person or juristic person which is in the same financial group or is the strategic partner of the Company, third party suppliers, outsourcers, service providers and supervisory agencies to collect, use and/or disclose your personal data, under your

consent or the permission of law, provided that such person is shall not use your personal data for the purpose other than the ones the Company has designated such person for.

6. Maintenance of data security

The Company realizes the importance of the security and safety of your personal data. Therefore, the Company put in place the measures to maintain security and safety of personal data that are appropriate and conform with the safekeeping of the confidentiality of personal data, to prevent unauthorized or unlawful loss, access to, use, alteration, correction or disclosure, of your personal data, in accordance with the information security policy of the Company.

7. Quality of personal data

Your personal data that the Company has received, such as name, address, telephone number, identification number, financial information, etc., which enables your identification and is complete and updated, will be used only for the purpose of the business operation of the Company. The Company will perform appropriate measure to maintain data security, as well as prevent unauthorized use of personal data without your permission.

8. Personal data Retention

The Company will collect and retain your personal data for as long as it is necessary to carry out the purposes for which it is collected. In case the customer has already ended business relationship with the Company, the Company will retain your data in accordance with the personal data retention policy, for examination by relevant government agencies and to comply with the requirement of laws, such as the law relating anti-money laundering which requires a minimum of 10 years of data retention. At the end of the retention period, the Company will destroy such personal data in accordance with the policy of the Company accordingly.

9. Data subject rights

9.1 Right to withdraw – you may withdraw the consent given to the Company at any time, and the Company shall cease to conduct your data processing at the soonest, provided that the Company may continue to process your personal data should the Company has other legitimate interest to your personal data processing, such as the case where the Company is required to comply with relevant law relating retention of such data, etc.

9.2 Right to access – you may request copy of your personal data from the Company and check whether the Company has processed your personal data as required by law.

9.3 Right to correction – you may request that your personal data remains accurate, up-to-date, complete and not misleading.

9.4 Right to deletion) – you may request the Company to erase or destroy your personal data, or anonymize your personal data to become the anonymous data which cannot identify your identity, in the case where there is no legitimate reason that the Company can continue to process your personal data; provided that you could exercise this right to deletion together with the right to object. However, the Company may continue to process your personal data should the Company has the legal basis that allows the Company to do so.

9.5 Right to object – you may object your personal data processing that the Company conducts on the legitimate interest basis. Moreover, you still have the right to object your personal data processing should the Company conducts it for the marketing purpose and pertaining to the profiling (automatic processing of your personal data that can analyze your behaviors , such as your preferences and interests pertaining to direct marketing), with exception to the followings:

- in the case where it is necessary to perform a task carried out for reasons of public interest of the Company and where it is the information that is essentially collected for the public interest, such as scientific, historical or statistic research

- in the case where it is necessary for the legitimate ground or to carry out for the establishment, compliance or exercise of legal claims, or defense of legal claims

9.6 Right to suspense - you have the right to request the Company to suspend your personal data processing temporarily, such as the case where you would like the Company to correct your personal data or you request that the Company verify the reason in processing your personal data. Moreover, you could also exercise this right in the following conditions:

- when the data subject prohibits the processing of his/her data and the given reason is more necessary than the legitimate interest of the Company;
- the data processing becomes no longer necessary, but the data retention is still necessary for the exercise of legal claims.

9.7 Right to portability - you may request the Company to send or transfer the data to other data controllers if it can be done by the automatic means or to directly obtain the personal data that the Company sends or transfers to other data controllers, unless it is not possible to do so because of technical reasons.

Moreover, you have the right to lodge a complaint to relevant government agencies in the case where the Company, its employee or contractor is in breach or does not comply with the Protection of Data Privacy Act.

You are held responsible to ensure with the Company that the personal data you provided the Company is accurate, complete, not misleading and always up-to-date.

10. Opting out of direct marketing information

You may refuse to receive marketing information from the Company by sending email to thuobamwealthservice@UOBgroup.com or contacting us at tel. +66 (0)2786-2222. If you decide not

to receive the marketing information, such opt out/refusal will not have anything to do with the services that the Company renders to you or any other transaction that you have with the Company.

11. Cookies

The Company website uses cookies to improve the web services and record site visits on the Company website without access to the database of your computer. Cookies is used to differentiate you from other users to help the Company in providing you good experience in browsing and in improving the Company website. If you would like to learn how to set Cookies, please see the Cookies policy.

12. Disclosure of actions, guidelines and policies pertaining to personal data

The Company has the policy to comply with laws, notification of the Office of Personal Data Protection Commission and other relevant laws; and also publicize the measures pertaining to protection of data of user of services on the Company website.

13. Responsibilities of data controllers

The Company issues rules and regulation that the data controllers have to comply with. To ensure the policy pertaining to the personal data protection is put in place according to the standard of this notice, the data controllers are obliged to comply with the information technology security policy.

14. Contact us

UOB Asset Management (Thailand) Company Limited

23A, 25th Floor, Asia Centre Building

173/27-30, 32-33 South Sathon Road

Thungmahamek, Sathon, Bangkok 10120

Tel: 02-786 2222 and Fax: 02-786-2369

E-mail : *thuobamdpocenter@UOBgroup.com*

(DPO Contact Center)