

# Global Privacy Charter

Version 1.0 | Effective: January 2025

## 1. Purpose

This Global Privacy Charter sets forth the principles by which Global Dot Bank ("GDB" or "the Bank") collects, processes, protects, and manages personal data across all jurisdictions in which it operates. The Charter ensures compliance with international data protection frameworks including the EU General Data Protection Regulation (GDPR), APEC Privacy Framework, and equivalent laws in Thailand, Singapore, and the United States.

## 2. Scope

This Charter applies to:

- All GDB entities, subsidiaries, branches, and affiliates
- All customer, employee, and partner data processed by GDB
- All systems and digital platforms under GDB's operational control

## 3. Data Privacy Principles

GDB adheres to the following core principles:

- **Lawfulness, Fairness, and Transparency** – All data processing is lawful, fair, and transparent to the individual
- **Purpose Limitation** – Data is collected for specific, legitimate purposes only
- **Data Minimization** – Only data necessary for the intended purpose is collected
- **Accuracy** – Data must be accurate and kept up to date
- **Storage Limitation** – Data is retained only for as long as necessary
- **Integrity and Confidentiality** – Data is protected against unauthorized or unlawful processing, accidental loss, or damage
- **Accountability** – GDB shall demonstrate compliance through documented policies and internal audits

## 4. Cross-Border Data Transfers

GDB ensures data transferred across jurisdictions adheres to binding corporate rules (BCRs), ensuring equivalent protection regardless of destination. All third-party processors are subject to strict due diligence and contractual data protection obligations.

## 5. Data Subject Rights

Individuals have the right to:

- Access their data held by GDB
- Request correction or deletion

- Restrict or object to processing
- Withdraw consent
- Data portability where applicable

Requests are processed within 30 days in accordance with GDPR Article 12.

## 6. Data Breach Notification

In the event of a data breach, GDB will:

- Notify the supervisory authority within 72 hours
- Inform affected individuals without undue delay if the breach poses a high risk to rights and freedoms

## 7. Governance & Oversight

The Chief Data Protection Officer (CDPO) is responsible for oversight of this Charter. All employees undergo mandatory data protection training annually.

## 8. Enforcement & Review

Non-compliance may result in disciplinary action or termination of vendor agreements. This Charter is reviewed annually by the Risk & Compliance Committee.

### Approved by:

Board of Directors, Global Dot Bank

Date: January 10, 2025