**Privacy Policy**

**[*Company Name*]** (the "**Company**," "**we**," "**us**," or "**our**") recognizes the importance of the protection of your Personal Data (as defined below).

This privacy policy (the "**Privacy Policy**") describes how we collect, use, disclose and transfer outside of Thailand your Personal Data. This Privacy Policy applies to our business, websites, mobile applications, call centers, events and exhibitions, online communication channels, and other locations where we collect your Personal Data.

**1. Personal data we collect**

"**Personal Data**" means any identified or identifiable information about you as listed below. In order to offer you our services, we might collect your information in a variety of ways. We may collect your Personal Data directly from you (e.g. through our relationship manager, salesperson, or call center) or indirectly from other sources (e.g. social media, third party’s online platforms, and other publicly available sources) and through our affiliates, service providers, business partners, official authorities, or third parties (e.g. third-party custodians, sub-custodians, and brokers). Which specific types of data collected depends on your relationship with us, and which services or products you require from us.

We will collect, use, disclose and/or transfer outside of Thailand the following categories and types of your Personal Data, including but not limited to:

1. **Personal details,** such as your title, name, gender, age, occupation, job title, salary, work place, work position, education, nationality, date of birth, marital status, information on government-issued cards (e.g. national identification number, passport number, tax identification number, driver's license details), signature, voice recording, phone records, picture, CCTV records, house registration, and other identification information;
2. **Contact details,** such as your address, telephone number, mobile number, fax number, email address, and other electronic communication ID;
3. **Account and financial details,** such as your credit card and debit card information, account number and account type, current assets, income and expenses, as well as payment details, service and product application details;
4. **Transaction details,** such as the type of products (e.g. securities, derivatives), price and quantity, order number, broker number, conditions (if any), trading history and balance, payment and transaction records relating to your assets, financial statements, liabilities, taxes, revenues, earnings and investments, source of wealth and funds, representation, trade information, default record, margin balance, and margin loan record;
5. **Technical details,** such as your Internet Protocol (IP) address, web beacon, log, device ID and type, network, connection details, access details, single sign-on (SSO) details, login log, access times, time spent on our page, cookies, login data, search history, browsing details, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on devices you use to access the platform;
6. **Profile details,** such as your account identifiers, username and password, PIN ID code for trading, interests and preferences, activities, investment objectives, investment knowledge and experience, and risk tolerance;
7. **Usage details,** such as information on how you use the websites, platform, products and services; and
8. [***Please insert additional types of personal data.***]

"**Sensitive Data**" means Personal Data classified by law as sensitive data. We will only collect, use, disclose and/or transfer outside of Thailand Sensitive Data if we have received your explicit consent or as permitted by law.

We will collect, use, disclose and/or transfer outside of Thailand the following Sensitive Data about you:

1. [biometric data, such as facial recognition or finger scans for certain products and services;
2. health data, such as medical information;
3. criminal records; and
4. race, religion, or other sensitive data as shown in the identification document.]

**2. How we collect, use or disclose your Personal Data**

We may collect, use, disclose and/or transfer outside of Thailand your Personal Data and Sensitive Data for the following purposes.

**2.1 Why consent is required**

We rely on your consent to:

1. provide marketing communications, information, special offers, promotional materials about the products and services of the Company, our affiliates and subsidiaries and the third parties which we cannot rely on other legal grounds;
2. collect, use, and/or disclose your Sensitive Data for the following purposes:
   1. biometric data, race, religion, or other sensitive data as shown in the identification document for the purpose of authentication and verification;
   2. health data for the purpose of [\*]
   3. criminal record for the purpose of background check; and
3. [cross-border transfer your Personal Data to a country which may not have an adequate level of data protection, for which consent is required by law].

Where legal basis is consent, you have the right to withdraw your consent at any time. This can be done so, by contacting [*insert contact information details*]. The withdrawal of consent will not affect the lawfulness of the collection, use, and disclosure of your Personal Data and Sensitive Data based on your consent before it was withdrawn.

**2.2 Purpose for which we may rely on other legal grounds for processing your Personal Data**

We may collect, use, disclose, and/or transfer outside of Thailand your Personal Data by relying on the following legal grounds: (1) a contractual basis, for our initiation or fulfillment of a contract with you; (2) a legal obligation; (3) the legitimate interest of ourselves and third parties, to be balanced with your own interest and fundamental rights and freedoms in relation to the protection of your Personal Data; (4) vital interest, for preventing or suppressing a danger to a person’s life, body or health; and (5) public interest, for the performance of a task carried out in the public interest or for the exercise of official actions.

We rely on the legal grounds in (1) to (5) above for the following purposes of collection, use, disclosure, and/or transfer outside of Thailand of your Personal Data:

1. contacting you prior to your entering into a contract with us;
2. processing applications for account opening, account maintenance, and operations relating to your accounts, including without limitation, processing your applications or requests for services or products, processing your transactions, generating your account statement, and operating and closing your accounts;
3. providing services to you, such as [securities brokerage, securities dealing, securities underwriting, mutual fund management, private fund management, investment advisory, securities lending and borrowing, derivatives dealing, derivatives brokerage, derivatives advisory, and derivatives fund management services], from time to time and dealing with all matters relating to the services;
4. providing investment products to you (including investment products of third parties) from time to time and dealing with all matters relating to the investment products;
5. managing your relationship with us and administration of your account with us;
6. preventing customers with certain limitations (e.g. elderly person) from engaging in certain types of transactions by themselves for the purpose of damage control;
7. carrying out your instructions or responding to your inquiries or feedback, and resolving your complaints;
8. conducting identity verification and credit checks, know-your-customer (KYC) and customer due diligence (CDD) processes, other checks and screenings, and ongoing monitoring that may be required under any applicable law;
9. preventing, detecting and investigating fraud, misconduct, or any unlawful activities, whether or not requested by any governmental or regulatory authority, and analyzing and managing risks;
10. complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any governmental, tax, law enforcement or other authorities (whether local or foreign), such as the Stock Exchange of Thailand, Thailand Futures Exchange, Thailand Securities Depository, Thailand Clearing House, Office of the Securities and Exchange Commission of Thailand, Bank of Thailand, Anti-Money Laundering Office, and Thai Revenue Department;
11. managing our infrastructure, internal control, and business operations and complying with our policies and procedures that may be required by applicable laws and regulations including those relating to risk control, security, audit, finance and accounting, systems and business continuity;
12. addressing or investigating any complaints, claims or disputes;
13. provide marketing communications, information, special offers, promotional materials about the products and services of the Company, our affiliates and subsidiaries and the third parties;
14. developing new services and products and updating you on our services and products from time to time;
15. carrying out research, planning and statistical analysis, for example, on your investment limit and investment behavior, for the purpose of developing our services and products;
16. organizing our promotional campaign or events, conferences, seminars, and company visits;
17. enforcing our legal or contractual rights including, but not limited to, recovering any and all amounts owed to us;
18. facilitating financial audits to be performed by an auditor, or receiving legal advisory services from legal counsel appointed by you or us;
19. performing our obligations under any agreements to which we are a party, e.g. agreements with our business partners, vendors, or other asset management companies, or under which we are acting as an agent; and
20. [*please insert additional purposes*].

If the Personal Data we collect from you is required to meet our legal obligations or enter into an agreement with you, we may not be able to provide (or continue to provide) our products and services to you if we cannot collect your Personal Data when requested.

**3.** **How we disclose or transfer your Personal Data**

We may disclose or transfer your Personal Data to the following third parties (including their personnel and agents) who process Personal Data in accordance with the purposes under this Privacy Policy. These third parties may be located in or outside Thailand. You can visit their privacy policies to learn more details on how they process your Personal Data.

**3.1 [*Company Name*] Group**

As [*Company Name*] is part of a [*Company Name*] Group, we may need to transfer your Personal Data to, or otherwise allow access to such Personal Data by, other companies within [*Company Name*] Group for the purposes set out above. Please see list of companies and scope of activities within [*Company Name*] Group [*here*].

**3.2 Our service providers**

We may use other companies, agents or contractors to perform services on our behalf or to assist with the provision of products and services to you. We may share your Personal Data to these service providers, including but not limited to: (a) IT service providers; (b) research agencies; (c) analytics service providers; (d) survey agencies; (e) marketing, advertising media and communications agencies; (f) payment service providers; and (g) administrative service providers.

In the course of providing these services, the service providers may have access to your Personal Data. However, we will only provide our service providers with the Personal Data that is necessary for them to perform the services, and we ask them not to use your Personal Data for any other purposes. We will ensure that all the service providers we work with will keep your Personal Data secure.

**3.3 Our business partners**

We may transfer your Personal Data to persons acting on your behalf or otherwise involved in the provision of the type of product or service you receive from us, including payment recipients, beneficiaries, account nominees, intermediaries (such as third-party securities companies, or asset management companies), custodians, correspondents, agents, vendors, co-brand business partners, market counterparties, issuers of products, or global trade repositories to whom we disclose Personal Data in the course of providing products and services to you and whom you authorize us to disclose your Personal Data to, provided that these data recipients agree to treat your Personal Data in a manner consistent with this Privacy Policy.

**3.5 Third parties permitted by law**

In certain circumstances, we may be required to disclose or share your Personal Data to a third party in order to comply with legal or regulatory obligations. This includes any law enforcement agency, court, regulator, government authority or other third party for which we believe disclosure or transfer is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party's or individuals’ personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues.

**3.6 Professional advisors**

We may disclose or transfer your Personal Data to our professional advisors relating to audit, legal, accounting, and tax services who assist in running our business and defending or bringing any legal claims.

**3.7 Third parties as assignees, transferees, or novatees**

We may assign, transfer, or novate our rights or obligations to a third party, to the extent permitted under the terms and conditions of any contract between you and us. We may disclose or transfer your Personal Data to assignees, transferees, or novatees, including prospective assignees, transferees, or novatees, provided that these data recipients agree to treat your Personal Data in a manner consistent with this Privacy Policy.

**3.8 Third parties connected with business transfer**

We may disclose or transfer your Personal Data to our business partners, investors, significant shareholders, assignees, prospective assignees, transferees, or prospective transferees in the event of any reorganization, restructuring, merger, acquisition, sale, purchase, joint venture, assignment, dissolution or any similar event involving the transfer or other disposal of all or any portion of our business, assets, or stock. If any of the above events occur, the data recipient will comply with this Privacy Policy to respect your Personal Data.

When we transfer Personal Data to the third parties, we will take steps to ensure the protection of your Personal Data, such as confidentiality arrangements or other appropriate security measures as required by law.

**4. International transfers of your Personal Data**

We may disclose or transfer your Personal Data to third parties or servers located overseas, and the destination countries may or may not have the same data protection standards as Thailand. We have taken steps and measures to ensure that your Personal Data is securely transferred, that the data recipients have suitable data protection standards in place, and that the transfer is lawful by relying on the derogations as permitted under the law.

**5. How long do we keep your Personal Data**

We retain your Personal Data for as long as is reasonably necessary to fulfill the purposes for which we have obtained it as set out in this Privacy Policy, and to comply with our legal and regulatory obligations. However, we may have to retain your Personal Data for longer duration, if required by applicable law.

# 6. Other important information about your Personal Data

1. **6.1 Cookies and how they are used**

If you visit our websites, we will gather certain information automatically from you by using Cookies. Cookies are tracking technologies that are used in analyzing trends, administering our websites, tracking users’ movements around the websites, and remembering users’ settings.

Most Internet browsers allow you to control whether or not to accept Cookies. If you reject Cookies, your ability to use some or all of the features or areas of our websites may be limited.

**6.2 Personal Data used by minors**

[Our activities are not generally aimed at minors and we do not knowingly collect Personal Data from customers who are minors (those who have not reach the legal age (20 years of age or by marriage)) without their parental consent when it is required, or from quasi-incompetent persons and incompetent persons without their legal guardian's consent. If you are a minor, quasi-incompetent or incompetent person and wish to engage in a contractual relationship with us, you must obtain the consent from your parent or legal guardian prior to contactingus or providing us with your Personal Data. If we learn that we have unintentionally collected Personal Data from any minor without parental consent when it is required, or from quasi-incompetent person or incompetent person without their legal guardians' consent, we will delete it immediately or continue to process such Personal Data if we can rely on other legal bases apart from consent.]

**6.3 Personal Data related to third parties**

If you provide the Personal Data of any third party [(such as your shareholders, directors, beneficiary, emergency contact, referral, and references)] to us, [e.g. their name, family name, email address, and telephone number], you represent that you have the authority to do so and to permit us to use the Personal Data in accordance with this Privacy Policy. You are also responsible for notifying the third party of this Privacy Policy and, if required, obtaining consent from the third party or rely on other legal basis.

**7. Your rights with regard to your Personal Data**

Subject to the applicable laws and exceptions thereto, you may have the following rights regarding your Personal Data:

1. **Access**: you may have the right to access or request a copy of the Personal Data we are processing about you;
2. **Data Portability**: you may have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to transmit this data to another data controller;
3. **Objection**: in some circumstances, you may have the right to object to how we process your Personal Data in certain activities;
4. **Deletion**: you may have the right to request that we delete or de-identify your Personal Data that we process about you, e.g. if the data is no longer necessary for the purposes of processing;
5. **Restriction**: you may have the right to restrict our processing of your Personal Data if you believe such data to be inaccurate, that our processing is unlawful, or that we no longer need to process this data for a particular purpose;
6. **Rectification**: you may have the right to have Personal Data that is incomplete, inaccurate, misleading, or out-of-date rectified;
7. **Consent withdrawal**: you may have the right to withdraw consent that was given to us for the processing of your Personal Data, unless there are restrictions on the right to withdraw consent as required by the law, or a contract that benefits you; and
8. **Lodge a complaint**: you may have the right to lodge a complaint to the competent authority if you believe our processing of your Personal Data is unlawful or non-compliance with applicable data protection law.

**8. Changes to this Privacy Policy**

From time to time, we may change or update this Privacy Policy. We encourage you to read this Privacy Policy carefully and periodically revisit [*Insert link to Privacy Policy here*] to review any changes that may occur in accordance with the terms of this Privacy Policy. We will notify you or obtain your consent again if there are material changes to this Privacy Policy, or if we are required to do so by law.

**9. Contacting Us**

If you wish to contact us to exercise the rights relating to your Personal Data or if you have any queries or complaints about your Personal Data under this Privacy Policy, please contact us or our Data Protection Officer via the following avenues:

1. [***Company Name***]

* [*Address*]
* [*Contact details i.e. email, telephone number*]

1. **Data Protection Officer**

* [*Name*]
* [*Address*]
* [*Contact details i.e. email, telephone number*]

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