

## Privacy Policy

### for Applicants and Personnel of KASIKORN SECURITIES PCL.

KASIKORN SECURITIES PCL. ("KS") has operated business in strict adherence to ethical standards with respect to and in compliance with applicable laws. As we have always placed importance on the right to privacy of applicants and personnel, we have formulated the Privacy Policy with details as shown below.

#### 1. What is the purpose of this Policy?

This Policy is intended to inform you, applicants and personnel of KS, whether being job applicants, scholarship applicants, scholarship recipients, directors, advisors, employees or students under KS's internship program, of objectives and details about collection, use and disclosure of your personal data including your legal rights related to the personal data which KS has collected, used and disclosed for the purpose of job application, scholarship application, internship or employment.

Your personal data which KS has collected, used and disclosed, other than that obtained from the process regarding job application, scholarship application, internship or employment, shall not be under the scope of the use of this Policy; for instance, your personal data that has been collected, used and disclosed by KS for the use of products or services provided by KS.

#### 2. What kinds of personal data are to be collected, used or disclosed?

2.1 Personal data refers to any information that can be used to identify your identity, either directly or indirectly (excluding information of the deceased), which are:

2.1.1 Personal data which you have directly provided to KS, including the data collected from job/scholarship application form and interview, as well as the data collected during the scholarship program, the internship program or the employment.

2.1.2 Personal data which KS has obtained or gained access to from other sources, not directly from you, such as government agencies, other companies within KASIKORNBANK FINANCIAL CONGLOMERATE, financial institutions, financial service providers, business partners, credit information companies and data service providers, etc. KS shall collect the data obtained from other sources only with your consent given as required by law, except for necessary cases as permitted by law.

Your personal data collected, used and disclosed by KS shall for example include:

- Private information such as name, surname, gender, age, date month and year of birth, place of birth, marital status, nationality, national ID number, passport number, citizenship, driving license number, military status, educational background, work history, learning activities, any certificates/licenses/permits and account number.

- Contact information such as address per house registration, current address, telephone number, email address, LINE ID and any information on social media.
- Information with regard to employment such as functional title, corporate title, department or section in organization, salary/wages, other remuneration, welfare, working hours record, leave of absence, promotion, job transfer, change in position, probation assessment, performance evaluation, skill and ability, personality and behavior (excluding sexual behavior).
- Information on equipment or devices such as IP address, MAC address, Cookie ID, IMEI.
- Information with regard to any relevant third party such as family members, beneficiary under welfare programs, emergency contact and referee.
- Other information such as websites application, opinions, preferences, hobbies, written examinations, voice recordings, still pictures, motion pictures, as well as the information regarding participation in any activities or campaigns organized by KS, and any other information regarded as personal data by applicable laws.

2.2 **Sensitive data** refers to specific personal data identified by law as being sensitive data such as race, political opinions, religious or philosophical beliefs, sexual behavior, criminal record, health information, disability, information regarding labor union, genetic data, biometric data or any other information of the same nature as specified by law, which require KS to conduct with special care. KS will collect, use and disclose your sensitive data as well as send or transfer them to other countries only with your explicit consent given to KS, or only in necessary cases as permitted by law.

(Unless specifically stated otherwise, your personal data and sensitive data shall collectively hereinafter be referred to as “Personal Data”)

### 3. **What are the purposes of collection, use or disclosure of your Personal Data?**

KS will collect, use and disclose your Personal Data; for consideration of granting a scholarship, an internship, or an employment; for your benefit in performing your duty as an employee or a personnel of KS; or for any other benefits as specified in this Policy.

3.1 **Contractual Basis:** for the purpose of performance of the contracts in which you are a contracting party, whether in scholarship contract, internship contract, employment contract, or any other contract; or for the purpose of proceeding upon your request/application form made before entered into the relevant contract, as the case may be. The purposes that your Personal Data being collected, used and disclosed by KS shall for example be for:

- (1) Written examination, interview, payment of wages or other remunerations, arrangement of welfare or other fringe benefits, working hours record, leave of absence, promotion, job

transfer, job rotation, organizational restructuring, performance assessment and management.

- (2) Skill and ability development, arrangement of employee card, employee registration, arrangement of employee data, communication, assignment and subcontracting, legal compliance, tax payment, risk management, compliance and supervision, prevention of fraud and corruption, disciplinary investigation, complaint handling, internal organizational management including within KASIKORN Financial Conglomerate, and for other purposes deemed necessary for employment.

**3.2 Legal obligation:** for the purpose of legal compliance by KS as being an employer or any other status. For example, the compliance with:

- (1) Civil and commercial law, labor law including labor protection and labor relations, computer law including computer crime, tax law and laws pertaining to financial institutions businesses, securities and exchange, insurance, social insurance, workmen's compensation, provident fund, bankruptcy, and prevention and combating money laundering and terrorism and weapons of mass destruction financing.
- (2) Other applicable laws including rules and regulations issued under the authority of the applicable laws of Thailand and other countries.

**3.3 Legitimate interest:** for the purpose of legitimate interest of KS, other persons, or other entities, provided that such interest shall not go beyond reasonable expectation; or for any other purposes permitted by law. For example:

- (1) Voice recordings, pictures, motion pictures or CCTV
- (2) Survey, participation in organizational activities, result announcement, parcel receipt-delivery, analysis, research or statistics.
- (3) Risk management, compliance and supervision, complaint handling, internal organizational management including within KASIKORN Financial Conglomerate, and the prevention, handling and mitigation of risks that may be incurred from fraud and corruption
- (4) Cyberattacks, violation of law and data examination on electronic devices for work efficiency enhancement, examination of performance behavior, and court proceedings
- (5) Anonymous data
- (6) Data of unqualified applicants and referees

**3.4 Consent:** to collect, use and disclose your Personal Data as deemed necessary. Your Personal Data shall for example include:

- (1) Health information including blood type, which is required for consideration of granting scholarship, employment, medical welfare, medical treatment at sickroom, referral for treatment at hospital.
- (2) Biometric data (such as face recognition, fingerprint or iris recognition), for the purpose of identification and verification in order to keep your working hours records, attend the meetings/seminars, participate the activities, or enter into the building.
- (3) criminal record/behavioral data , for consideration of granting scholarship and employment, or for job assessment and evaluation
- (4) Religious information for consideration in approving ordination leave/Islamic pilgrimage (Hajj) leave/food preparation/religious ceremony in case of death.

4. **To whom will your Personal Data be disclosed?**

KS may disclose your Personal Data to third party with your consent provided, or as permitted by laws for the purposes specified in this Policy, including but not limited to KASIKORNBANK Financial Conglomerate, data processors, domestic and overseas outsourcing companies, KS's representatives or agents, organizations or companies that KS has visited for a field trip, sub-contractors, financial institutions, auditors, external auditors, competent authorities, assignee and/or prospective assignee including the assignment of mergers and acquisitions, and any entity/person who has established a relationship or entered into an agreement/contract with KS, including executives, employees, contractors, representatives/agents, advisors of both KS and persons/entities which are the data recipients.

5. **Will KS send or transfer your Personal Data to other countries?**

As KS has conducted businesses in many countries, it may be necessary to send or transfer your Personal Data as a normal course of business; to its affiliates or subsidiaries in other countries of which you are working at; or to other data recipients. For instance, Personal data may be sent or transferred to be stored in server/cloud in various countries.

If the recipient country fails to meet the standards required for data protection, KS ensures that Personal Data will be sent or transferred in compliance with the laws, while personal data protection and remedial measures will be put in place as deemed necessary and appropriate and consistent with the privacy standards required by laws of the recipient country. For instance, the data recipient in such country must enter into a confidential undertaking agreement, or in case the data recipients are KS's affiliates or subsidiaries located abroad, KS may establish a privacy policy which verified and certified by relevant competent authorities, so that Personal Data shall be sent or transferred to KS's affiliates or subsidiaries in accordance with the established privacy policy instead of complying with the laws of the recipient country.

6. How long do KS keep your Personal Data?

KS will keep and safeguard your Personal Data for necessary duration of your job application or employment, or throughout the period necessary to achieve the relevant objectives of this Policy, accordingly your Personal Data may require to be retained for an additional period thereafter as required or permitted by law, for example:

- 6.1 **Unqualified Job Applicant:** Your Personal Data will be kept and safeguarded for one year as evidences to prove that job screening process has been undertaken by KS with fairness; or for three years with your consent given for further consideration of matching your application with other job positions available in the future.
- 6.2 **Unqualified Scholarship Applicant:** Your Personal Data will be kept and safeguarded for one year.
- 6.3 **Employee/Personnel:** Your Personal Data will be kept and safeguarded in accordance with labor laws for the purpose of proof and investigation, in case there is any dispute arising within limitation period set by applicable law, which shall however be no more than 10 years.

Your Personal Data will be deleted, destroyed or made anonymous after there has been no necessity to be kept or at the end of the aforementioned duration or period.

7. How do KS protect your Personal Data?

KS shall apply both technical and organizational measures for safeguarding your Personal Data in order to maintain security and appropriateness in processing of your Personal Data as well as to prevent the violations of privacy. KS has established policies, rules and orders of procedures for privacy protection, such as, IT system security standards and prevention measures for unauthorized or illegitimate use or disclosure by the data recipient including prevention for the use or disclosure beyond the objectives hereunder. The established policies, rules and orders of procedures will be periodically reviewed, as deemed necessary and appropriate.

In any operation regarding your Personal Data, our employees, personnel, representatives/agents and data recipients have been instructed to maintain the confidentiality and security of your Personal Data in accordance with the measures determined by KS.

8. What are your rights in connection with your Personal Data?

All rights under this section are your legal rights to be informed. You may exercise your rights pursuant to any applicable laws, policies that now available or to be implemented or amended in the future, and criteria determined by KS.

- 8.1 **Right to revoke consent:** You are entitled to revoke the consent that you have given to KS to collect, use and disclose your Personal Data (whether such consent is given prior to or after the enforcement of Personal Data Protection Law), at any time of which your Personal Data is held by KS, unless there is any restriction imposed by law, or there is any existing contract which providing you some benefits.

For your own benefit, please assess or inquire into the potential impacts before deciding to revoke your consent as you may be adversely affected by the revocation.

- 8.2 **Right to access:** You are entitled to have access to your Personal Data maintained under KS's responsibility and to make a request for any copies of your Personal Data, as well as to make an enquiry on how your Personal Data have been obtained without your consent.

- 8.3 **Right to data portability** You are entitled to request to obtain your Personal Data if KS organizes such Personal Data in automatic machine-readable or usable format and can be processed or disclosed by automated means; to request KS to send or transfer your Personal Data in the said format directly to other data controllers if doable by automatic means; and to request to obtain the Personal Data in such format sent or transferred by KS directly to other data controllers unless not technically feasible.

- 8.4 **Right to object:** You are entitled to lodge an objection, at any time, in case the collection, use or disclosure of your Personal Data is undertaken for the purpose of public interest or legitimate interest of KS or other persons/entities. After your objection has been submitted, KS shall continue to collect, use and disclose your Personal Data only if KS can provide legal grounds that the collection, use and disclosure of your Personal Data is more critical than observing your legal rights, or is for the compliance with the laws, or for legal proceedings, as the case may be.

- 8.5 **Right to erasure or right to be forgotten:** You are entitled to request to delete or destroy your Personal Data or make them anonymous; if you deem that your Personal Data have been collected, used or disclosed illegitimately, or it is no longer necessary for KS to retain the Personal Data pursuant to relevant objectives of this Policy; or if the aforementioned right to revoke consent or right to object has already been exercised by you.

- 8.6 **Right to restrict processing:** You are entitled to request KS to temporarily stop using your Personal Data, in case KS is on process of conducting an investigation per your request to exercise the right to rectification or the right to object, or in any other cases where it is no longer necessary for KS to retain your Personal Data and KS is obliged to delete or destroy the Personal Data in accordance with relevant laws, but you prefer to exercise the right to restrict processing instead.

- 8.7 **Right to rectification:** You are entitled to rectify your Personal Data to keep them accurate, up-to-date, complete and not misleading.
- 8.8 **Right to lodge a complaint:** You are entitled to lodge a complaint to relevant competent authorities if the collection, use and disclosure of your Personal Data are deemed to violate or not comply with applicable laws.
- 8.9 The exercise of the aforementioned rights may be restricted by applicable laws and, in certain cases, there may be compelling reasons that may cause KS to deny your request or may prevent KS from complying with your request, such as compliance with laws or competent judicial orders, public interest, or potential violation of other persons' rights or freedom. If KS opts to deny your request, KS shall inform you the reasons for such denial.

| Rights                              | Time to take effect* |
|-------------------------------------|----------------------|
| Right to revoke consent             | 7 days               |
| Right to access                     | 30 days              |
| Right to data portability           |                      |
| Right to object                     |                      |
| Right to erasure or to be forgotten |                      |
| Right to restrict processing        |                      |
| Right to rectification              | Immediately          |

## 9. How can you contact KS and the responsible contact persons?

If you have any suggestions or enquiries regarding details of the collection, use or disclosure of your Personal Data, or would like to exercise the rights under this Policy, you may contact KS and/or the responsible contact persons via the following channels:

- Responsible Contact Person, Human Resources Department

Contact address: KASIKORN SECURITIES PCL

KASIKORNBANK Building, 1st, 3rd, 11th and 19th Floor,

400/22 Phahon Yothin Road, Sam Sen Nai Sub-District,

Phaya Thai District, Bangkok 10400

Email: [hr.dpo@kasikornsecurities.com](mailto:hr.dpo@kasikornsecurities.com)

- Responsible Contact Person, KASIKORN SECURITIES PCL

Contact address: KASIKORN SECURITIES PCL

KASIKORNBANK Building, 1st, 3rd, 11th and 19th Floor,

400/22 Phahon Yothin Road, Sam Sen Nai Sub-District,

Phaya Thai District, Bangkok 10400

Email: [ks.dpo@kasikornsecurities.com](mailto:ks.dpo@kasikornsecurities.com)