

Privacy Policy

Bangkok Mitsubishi HC Capital Company Limited (hereinafter the "Company") focus on enhancing the system of internal management such as risk management, compliances, and internal audits as one of the most important issue for businesses. The Company recognizes that it is our social responsibility to handle customer's personal data appropriately and sets out Privacy Policy as follows. In addition, The Company management and employees observe this policy, and ensures the protection of personal information.

1. The purpose of collecting personal information shall be clearly indicated, and the collected information shall be used and/or provided within the scope of the indicated purpose.
2. Collected personal information shall be managed accurately and kept up to date to the extent required for the intended purpose.
3. Collected personal information shall be managed strictly to prevent illegal access, loss, disposal, modification, and leakage; adequate security measures shall be taken.
4. Individuals may review and edit their own personal information stored by the information provider after authenticating personal identification following our predefined procedure to the extent appropriate. If an error is discovered in the retained information after disclosure, it shall be corrected immediately.
5. Recognizing the importance of protecting personal information, we shall establish an internal system for protection of personal information by implementing systematic security measures and continuously improve them.

Bangkok Mitsubishi HC Capital Company Limited

Mr. Taro Hasegawa

President

PDPA Privacy Policy

Bangkok Mitsubishi HC Capital Company Limited (hereinafter the "**Company**" or "**we**") in connection with the provision of our service (the "**Service**") to customers, both our existing customers and prospective customers, including authorized directors, representatives, contact persons and/or employees of our customers and prospective customers (the "**Customers**") in the Thailand, the Company shall comply with the Thailand Personal Data Protection Act (the "**PDPA**"), any amendment, regulations, rules, notifications, and orders in relation to the PDPA which are currently enforced or to be enforced in the future ("**applicable laws**"), and therefore hereby establishes this PDPA Privacy Policy in order to appropriately process the personal data of Customers in Thailand.

1. PROCESSING PERSONAL DATA

(1) Definitions

"**Personal data**" means any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular, including, without limitation, names, addresses, dates of birth, telephone numbers, e-mail addresses.

"**Processing**" means any collection, use, disclosure or other operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, alignment or combination, restriction, erasure or destruction.

(2) Types of personal data to be acquired

The types of personal data to be acquired will be specified prior to the provision of the Service by the Company.

(3) Purposes of collection and use of personal data

The Company will collect personal data for the following purposes depending on relationship between you and the Company:

- (i) To perform a contract with you or your employer or to take steps at your request before entering into a contract, including to:
 - Provide information regarding our Services;
 - Assist you and answer your requests;
 - Evaluate if we can offer you the Services and under which conditions (e.g. our credit analysis process); and

- Provide Services to our corporate clients of whom you are an employee or representative;
- (ii) To comply with legal obligations and to report or disclose information to government authorities as required by laws, including anti-money laundering and combating financing of terrorism, laws relating to vehicles, land transport and land traffic, laws relating to commission of offences relating to computers, foreign exchange control laws, tax laws, and personal data protection laws;
- (iii) To develop our Services, to improve our risk management, and to defend our legal rights, including:
 - Proof of transactions;
 - Fraud prevention;
 - IT management, including infrastructure management (e.g. shared platforms), business continuity and IT security;
 - Improving the quality of our Services; and
 - Advertising Services that match with your situation and profile.
- (iv) To evaluate, improve and develop our Services, marketing activities, and sales promotion;
- (v) To survey your satisfaction with our Services including our sales personnel's service quality and to analyze your preferences, market research and develop our products and services to meet your requirements;
- (vi) To inform you about product or service information, special privileges, marketing campaign and activities, and sales promotion, to offer our products or services, and to send activity invitation;
- (vii) To communicate with you in case of emergency and other notifications without marketing purpose;
- (viii) To monitor security in our premises by using CCTV to collect images of those who contact us at our premises.

The Company will process the personal data only within the scope of the purposes of collection and use above.

In the case of processing the Customers' personal data for purposes other than the above, the Company will notify and obtain consent from you as the data subject under the applicable laws in advance of such new purposes of use and other matters as required by applicable laws.

By manifesting their intention to consent for any processing activity which relies on consent basis, Customers will be deemed to have consented to the processing of their personal data by the Company within the scope of the relevant purposes, and the Company will process the Customers' personal data based on such Customers' consent; provided, however, that Customers may withdraw such consent at any time. Even

in that case, this will not affect any legitimate processing performed pursuant to consent before the Customers' withdrawal thereof.

The personal data that Customers are to provide is necessary in order for the Company to provide the Service to the Customers and in some situations, to enable the Company to comply with applicable legal obligations, and there may be cases in which Customers who have not provided such data will be unable to use Service.

(4) Retention Period

The Company will retain the Customers' personal data as long as the Company requires such data for achieving the purposes of use specified in this Privacy Policy and will promptly delete the same in the case that such data is no longer necessary. The criteria used to determine our retention periods include: we retain the personal data for the duration we have an ongoing relationship with you; or we may retain the personal data for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to be comply with, for any other cause, our internal policies and regulations.

(5) Disclosure of personal data

The Company may disclose your personal data in certain circumstances, for the purposes set out in this Privacy Policy, to the following third parties:

- (i) Subsidiaries, affiliates and any related companies (i.e. (a) a company that holds shares in the Company and/or a company whose shares are held by the Company, and/or (b) a company whose shares are held by the company/companies indicated in (a) herein above whether directly or indirectly) for business purposes, internal management, fraud prevention and detection, and undertaking any other activity as set out in this Privacy Policy;
- (ii) Government authorities, supervisory authorities or other authorities as stipulated by laws, including competent official, e.g. courts, police officers, revenue department, department of land transport and other competent authorities;
- (iii) Agencies, contractors/sub-contractors, banks/financial institutions, and/or service providers in relation to operations of business of the Company, including:
 - Carriers, document storage and destruction service providers, printing house, marketing agency, IT development and maintenance companies.
 - Auditors, lawyers, tax and legal advisers and any consultants.
 - Call Center service companies.

- (iv) Business partners of the Company or other third parties as per your consent or contractual requirements or legal requirements, as the case may be;

(6) Transfer of personal data outside Thailand

The Company may provide the Customers' personal data to third parties such as the subsidiaries and affiliates of the Company, cloud vendors and outside contractors of the Company, etc., to implement the purposes of collection, use and disclosure specified above. Countries located outside Thailand (including, without limitation, Japan, Singapore, Hong Kong, the same shall apply hereafter) are among the third parties to whom the Company will disclose the Customers' personal data, and in such case, the Company shall comply with the requirements under the applicable laws for the purpose of the transfer hereunder, including the following matters;

- (a) In the case that the country in which the third party is located is outside Thailand, such country does not have the same data protection laws as Thailand, i.e., many of the rights provided to data subjects in Thailand are not given;
- (b) The Customers' personal data will be provided and processed for the purposes specified in 1(3) and 1(5) above by third parties outside Thailand; and
- (c) The Customers' personal data will be provided to third parties located outside Thailand.

In addition to the above, in the case that the Company provides the Customers' personal data to a third party located in a country outside Thailand, the Company will ensure that adequate measures are taken concerning the protection of the Customers' personal data as required under the applicable laws.

(7) Rights of Customers

The Customers may request from the Company access to, rectification or erasure of, and restriction of processing of their personal data, may object to the processing of the Customers' personal data, and may request data portability. Where the Company requests for the Customers' consent, the Customers may also withdraw consent given to the Company for processing of their personal data at any time according to the applicable laws. The Company accepts such Customers' requests at the contact point set forth in "2. Contact" below.

The Company may refuse the Customers' requests if the Company deems that there is no basis for such Customers' requests or if they are deemed excessive. The Customers may raise objections or file a complaint with the competent official under the applicable laws with regard to the processing of their personal data.

2. CONTACT

In the event of Customers having any questions or concerns regarding this Privacy Policy or the processing of personal data by the Company, or having any requests concerning the access to, rectification of, erasure of, or restriction of processing of personal data, or regarding data portability, please contact the Company at the following contact information:

Data Protection Officer

Bangkok Mitsubishi HC Capital Company Limited

26th Fl., Asia Centre Tower 173/35 South Sathorn Road, Thungmahamek, Sathorn, Bangkok 10120

Tel: (0) 2163 6400 ext. 232

Email: dpo@th.mitsubishi-hc-capital.com

3. UPDATE TO THIS PRIVACY POLICY

The Company regularly reviews and, if appropriate, updates this Privacy Policy from time to time to ensure that Customers' personal data is properly protected. In case of any update to this Privacy Policy, the Company will inform the Customers through the Company's website. Please visit <https://www.th.mitsubishi-hc-capital.com> from time to time for the updated Privacy Policy.

Published on 25 April 2022.