



MEGA INTERNATIONAL COMMERCIAL BANK PUBLIC COMPANY LIMITED

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PRIVACY NOTICE

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Mega International Commercial Bank Public Company Limited (“**Mega**”, “**we**”, “**our**”, or “**us**”), we value your privacy and committed to protecting privacy, including your personal data or personal data relating to individuals connected to your business (collectively referred to as the “**Personal Data**”) based on Personal Data Protection Act B.E. 2562 (2019), and earning your trust. We will only use the information that we collect about you for the purposes set out in this Privacy Notice (the “**Notice**”). **You have the right to give the consent, where required, without affecting the consideration to use the Bank’s products or services.**

This Notice describes Mega approach to privacy as data controller.

1. Personal Data We Collect

We may collect the Personal Data about you from a variety of sources as follows: -

- When you apply for our products and/or services;

When you talk to us on the phone or in branch, including recorded calls, posts, e-mails, notes and other means;

- When you use our websites. This includes other internet tracking software to collect the Personal Data;
- Financial reviews and interviews;
- Customer surveys;
- When you take part in our competitions or promotions;
- When you manifestly publish your Personal Data, including via social media (e.g., we may collect your Personal Data from your social media profile(s), to the extent that you choose to make your profile publicly visible);
- When we receive your Personal Data from third parties, e.g., your employer, our customers, credit reference agencies, law enforcement authorities, etc.; and/or
- When you purchase any of our products or services from the third parties.

In some instances, we may also use the Personal Data collected across non-affiliated websites for the purpose of serving you advertisements related to your browsing

behaviour. While we engage in this practice, we will provide an appropriate notice and choice so that you can opt-out such processing.

The categories of Personal Data about you that we process, subject to the applicable law, are as follows: -

- **Personal details:** name, surname, gender, date of birth, marital status, personal identification number, passport number, other government issued number(s) for verifying personal identity, tax identification number, nationality, image of passport, driving license or identification card, signatures, authentication data (e.g., passwords, answer in case you forget your password, PINs, facial and voice recognition data), photographs, visual images and CCTV images;
- **Family details:** names and contact details of family members and dependents;
- **Contact details:** address, telephone number, email address and social media profile details;
- **Financial details:** billing address, bank account numbers, credit card numbers, cardholder or account holder name and details, instruction records, transaction details and counterparty details; and/or
- **Electronic data:** IP addresses, cookies, activity logs, online identifiers, unique device identifiers and geolocation data.

2. How We Collect, Use and/or Disclose the Personal Data

We may collect, use and/or disclose your Personal Data only if we have proper reasons and it is lawful to do so. This includes sharing it outside Mega.

We will rely on one or more of the following lawful grounds when processing your Personal Data:

- When it is to fulfil a contract, we have with you (contractual basis) – that is when we need your Personal Data to deliver a contractual service to you or before entering into a contract with you;
- When it is legally required under the law (legal obligation) – that is when we need to process your Personal Data to comply with the law or statutory obligation;
- When it is in our legitimate interest (legitimate interest) – that is when we process your Personal Data for our interest as permitted under the law, so long as your interests or the fundamental rights and freedoms are not overridden by our interest;
- When you consent to it (consent) – that is when you allow us to process your Personal Data for certain purposes; and/or
- When it is public task/legal basis – that is when need to process your Personal Data on the activity that necessary for the performance of tasks in public interest or duties that the government assigned.

The purposes for which we may process your Personal Data, subject to the legal basis on which we may perform such processing, are: -

Purposes of data processing	Legal basis for processing
Products and services	
<ul style="list-style-type: none"> • To deliver our products and/or services • To manage our relationship with you or your business • To study how you use the products and/or services from us and other organisations • To work on which of our products and/or services that may interest you • To communicate with you about our products and/or services • To facilitate financial services • To develop the products and services 	<ul style="list-style-type: none"> • Contractual basis • Legitimate interest • Consent
Our legal obligations	
<ul style="list-style-type: none"> • To submit regulatory reports to relevant authorities • To prevent and detect money laundering and financing of terrorism and comply with regulation relating to sanctions and embargoes through our Know Your Customer (KYC) process (to identify you, verify your identity, screen your details against sanctions lists and determine your profile) and Client Due Diligence (CDD) as prescribed by anti-money laundering law and other relevant law • To comply with applicable laws and regulations 	<ul style="list-style-type: none"> • Legal obligation
Customer support	
<ul style="list-style-type: none"> • To make and manage customer payments • To collect and recover money that is owed to us 	<ul style="list-style-type: none"> • Contractual basis
Business improvement	
<ul style="list-style-type: none"> • To identify issues with existing products and services • To plan the improvements to the existing products and services • To develop new ways to meet our customers' needs and to grow our business • To test, analyze, develop and/or create new products and services 	<ul style="list-style-type: none"> • Contractual basis • Legitimate interest
Security and risk management	

Purposes of data processing	Legal basis for processing
<ul style="list-style-type: none"> • To detect, investigate, report, and seek for a financial crime prevention • To manage risk for Mega and our customers • To understand and analyze your need and satisfaction to protect your Personal Data • To obey the laws and regulations that apply to Mega • To respond to complaints and seek for a resolution 	<ul style="list-style-type: none"> • Legitimate interest • Legal obligation • Contractual basis • Consent
Marketing	
<ul style="list-style-type: none"> • To develop and carry out marketing activities • To communicate with you via email, telephone, text message, social media, post or in person about our, group companies' and/or trusted partners' products and/or services that you may be interested in • To maintain and update your contact information where appropriate. 	<ul style="list-style-type: none"> • Consent • Legitimate interest

When we rely on the legitimate interest as the reason for processing the Personal Data, it has considered whether your rights are overridden by our interests and has concluded that they are not.

If You Fail to Provide Your Personal Data to Us

Where we are required by law to collect your Personal Data or need to collect your Personal Data under the terms of contract, we have with you and you fail to provide your Personal Data when requested, we may not be able to perform the obligation under the contract we have with you or plan to enter into with you (for example, to provide you with our account opening services). In this case, we may have to decline to provide the relevant services, but we will notify you if this is the case at the time your Personal Data is collected.

3. Personal Data We Share

We may share your Personal Data with others where it is lawful to do so, including where we or they: -

- need to provide you with a requirement under the contract, or products and/or services you have requested, e.g., to fulfil a payment request;
- have public or legal duties to do so, e.g., to assist with detecting and preventing a fraud, tax evasion and financial crime, etc.;

- need to, in connection with a regulatory reporting, litigation or asserting or defending legal rights and interests;
- have legitimate business reasons to do so, e.g., to manage risk, verify identity, enable another company to provide you with the services you have requested or assess your suitability for the products and/or services; and/or
- ask for your permission to share it, and you agree.

We may share your Personal Data for the purposes above with others, including:-

- other group companies¹ and any sub-contractors, agents, business partners or service providers who work for us or provide the services to us or other group companies, including their employees, sub-contractors, service providers, directors and officers;
- any trustees, beneficiaries, administrators or executors;
- people who give guarantee or other securities for any amount you owe us;
- people you make the payment to and receive the payment from;
- your intermediaries, correspondent and agent bank, clearing houses, clearing or settlement systems, market counterparties and any company you carry out investment services through us;
- other financial institutions, lenders and holders of securities over any properties or assets you charge to us, tax authorities, trade associations, credit reference agencies, payment service providers and debt recovery agents;
- any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- any people or companies where required in connection with a potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any parties appointed or requested by our regulators to carry out investigations or audits of our activities;
- other parties involved in any disputes, including disputed transactions;
- fraud prevention agencies who will also use it to detect and prevent fraud and other financial crime and to verify your identity;
- anyone who provides instructions or operates any of your accounts, products or services on your behalf, e.g., attorney, solicitors, intermediaries, etc.;
- anybody else that we have been instructed to share your Personal Data with by you; and/or
- other parties involved in any marketing purposes.

Except as described in this Notice, we will not use the Personal Data for any purposes other than the purposes as described to you in this Notice. Should we intend to collect, use and/or disclose additional Personal Data which are not described in this Notice, we will notify you and obtain your consent prior to the collection, use and/or disclosure unless we

¹Group companies refer to one or more of Mega International Commercial Bank Public Company Limited, including its subsidiaries, affiliates, associated companies and their related entities.

are permitted to do so without your consent under the law. You will also be given the opportunity to consent or to decline approval of such collection, use and/or disclose of your Personal Data.

We will continue to adhere to this Notice with respect to the Personal Data that we have in our possession relating to prospective, existing and former clients and investors.

Cross-border Transfer of Personal Data

Your Personal Data may be transferred to and stored/processed in other countries. Such countries may not have the same level of protection for the Personal Data. When we do this, we will ensure they have appropriate levels of protection and that the transfers are lawful. For example, your Personal Data may be shared to other group companies in accordance with the Data Transfer Agreement, which require the group companies who receive the Personal Data from us must comply with the terms therein when processing your Personal Data. We may need to transfer the Personal Data in this way to carry out our contract with you, fulfill the legal obligations, protect the public interests and/or for our legitimate interests. In some countries, the law might compel us to share certain Personal Data, e.g., with tax authorities or National Bank. Even in these cases, we will only share the Personal Data with people who have the right to see it.

4. Retention of Personal Data

We retain your Personal Data for as long as it is necessary to carry out the purposes for which it was collected, e.g., for business and legal purposes, or compliance with the applicable laws.

We may keep your Personal Data for up to 10 years after you stop being our customer to ensure that any contractual dispute that may arise can be processed within that time. However, in the event of regulatory or technical reasons, we may keep your Personal Data for more than 10 years. We will not retain your Personal Data for longer than is required by law, we will destroy, delete or anonymize it (so that it can no longer be associated with you).

Where you receive the products and/or services from a third party, e.g., insurance company, who has been introduced to you by us, such third party may keep your Personal Data in accordance with additional terms and conditions applying to its products and services.

5. Accuracy of Your Personal Data

We need your help to ensure that your Personal Data is current, complete, and accurate. Please inform us of any changes to your Personal Data by contacting any of our Relationship Manager at our head office or branches specified in Clause 10.

We will also occasionally request the updates from you to ensure that the Personal Data we use to fulfill the purposes of collection, use and/or disclosure are current, accurate and complete.

6. Your Rights and Choices

You have the following rights under the PDPA in relation to your Personal Data:-

- **Right to Withdraw:** This enables you to withdraw your consent to our processing of your Personal Data, which you can do at any time and we will stop processing your information as soon as possible. We may continue to process your Personal Data if we have another legitimate reason to do so;
- **Right to Access:** This enables you to receive a copy of Personal Data we hold about you and to check that we are lawfully processing it;
- **Right to Correct:** This enables you to have any incomplete or inaccurate information we hold about you corrected. Please see above in paragraph 5 (Accuracy of Your Personal Data) for detail of how you can request to have your Personal Data corrected;
- **Right to Erasure:** This enables you to ask us to delete or remove, destroy or anonymize your Personal Data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below). This is not a blanket right to require all Personal Data to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your Personal Data;
- **Right to Object:** This enables you to object to the processing of your Personal Data where we are relying on the legitimate interest and there is something about your particular situation which makes you want to object to the processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes and profiling activities (the automated processing of your Personal Data to help us evaluate certain things about you, for example, your personal preferences and your interests) relating to a direct marketing;
- **Right to Restrict Processing:** This enables you to ask us to suspend the processing of your Personal Data, for example, if you want us to establish its accuracy or the reason for processing it.
- **Right to Portability:** This enables you to request the transfer of your Personal Data to another party; and

- **Right to Lodge a Complaint:** This enables you to file the complaint with a related government authority, including but not limited to, the Personal Data Protection Committee of Thailand (“**PDPC**”) in the case where, in your view, we our employees or contractors violate or fail to comply with the PDPA or notifications issued thereunder.

Handling of Complaints

In the event that you wish to make the complaint about how we process your Personal Data, please contact any of our Relationship Manager at our head office or branches specified in Clause 10 and we will try to consider your request as soon as possible. This does not prejudice your right to file the complaint with a related government authority, including but not limited to, the PDPC.

7. Security of Your Personal Data

Information is our asset and therefore we place a great importance on ensuring the security of your Personal Data. We regularly review and implement up-to-date physical, technical and organizational security measures when processing your Personal Data. We have internal policies and controls in place to ensure that your Personal Data is not lost, destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties. Our employees are trained to handle the Personal Data securely and with utmost respect, failing which they may be subject to a disciplinary action.

8. Your Responsibilities

You are responsible for making sure that the Personal Data you give us or provided on your behalf, is accurate and up to date, and you must tell us as soon as possible if there are any updates.

You have some responsibilities under your contract to provide us with the Personal Data. You may also have to provide us with the Personal Data in order to exercise your statutory rights. Failing to provide the Personal Data may mean that you are unable to exercise your statutory rights.

Certain Personal Data, such as contact details and payment details, must be provided to us in order to enable us to enter into the contract with you. If you do not provide such Personal Data, this will hinder our ability to administer the rights and obligations arising as a result of contract efficiently.

9. Revision of Our Notice

We keep our Notice under a regular review and thus the Notice may be subject to change. The date of last revision of Notice can be found on the beginning of the Notice.

10. How to Contact Us

If you have further questions regarding the protection and/or processing of Personal Data or would like to exercise your rights, please contact our Relationship Manager at 02-259-2000 or Data Protection Officer via dpo@megaicbc.com