

SUMITOMO MITSUI AUTO LEASING & SERVICE (THAILAND) CO., LTD.

PRIVACY NOTICE FOR SHAREHOLDERS OF THE COMPANY

The purpose of this Privacy Notice (the “Notice”) is to provide details with regard to the collection, use and disclosure of your Personal Data by **Sumitomo Mitsui Auto Leasing & Service (Thailand) Co., Ltd.** (the “Company”) pursuant to the Personal Data Protection Act B.E. 2562 (2019). This Notice shall apply to you as a person who has a relationship with the Company as individual shareholders and a representative or a proxy acting on behalf of individual shareholders or shareholders which is a juristic person.

DEFINITION

“**Personal Data**” means any information relating to a natural person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons.

“**Sensitive Personal Data**” means a Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may engender the unfair discrimination against the data subject or affect the data subject in the same manner as prescribed by law.

“**Legal Basis**” means the justifiable ground to collect Personal Data as prescribed in the Personal Data Protection Act B.E. 2562 (2019).

CATEGORIES OF PERSONAL DATA WHICH THE COMPANY COLLECTS

The Company will collect all or part of your Personal Data as specified in this Privacy Notice, as necessary for proceeding with the purposes of the Company which informed in this Privacy Notice.

- **Personal identification and general contact information** such as prefix, name, surname, nickname, age, sex, date of birth, nationality, occupation, current address or address of house registration, picture, signature, birthmark, living status, marital status, family status, personal phone number, home phone number, personal email address etc.
- **Financial information and personal business** such as wage information, number of bank account etc.
- **Information of reference person and family members** such as information of reference person, information of spouse, number of siblings, order of siblings, number of children, age and education of children, name, occupation and age of parents etc. (remarks: in the case where you have specified a reference person or referred to any other

third person, you are obliged to inform such third person that you have provided his/her information to the Company together with the relevant details in this Notice which related to such person).

- **Information contained in the reference** such as information of the social security card, identification card, passport, tax identification card, Thai work permit or Thai professional license, military discharge/exemption letter, driving license, house registration, academic credential, degree certificate, degree certification documents and other documents which are provided to the Company etc.
- **Information regarding occupation, expertise or special skills** such as work skills, language skills, special knowledge, work experience and work history, termination history, educational background, current and previous workplace, working period from past to present, latest income, reason of resignation, reference information by third parties, change of position, name and relationship of known personnel in the Company, hobby etc.
- **Information regarding benefits and welfare received due to working with the company such as** the social security information, provident fund information, group life insurance information etc.
- **Interview assessment and performance assessment information by the Company** such as skills assessment result, comments to the applicant, interview result, appointed position, probationary period, salary and other conditions which related to offer for employment, probation evaluation result, annual evaluation result etc.
- **Closed circuit television information** such as motion picture or still images recorded by the closed-circuit television cameras.
- **Information regarding shares held in the company** such as information which appears in the share certificate, share register book and lists of shareholders.
- **Information regarding exercising rights and performing duties as a shareholder of the company** such as attendance information of the shareholders' meeting of the company, proxy information for attending the shareholders' meeting of the company, voting information, information on received dividends and tax payment from the dividends.
- **Sensitive Personal Data** such as blood group, religion, drug use history, criminal record, fingerprint, face scan image, shape and position of eye and nose, health information e.g. disability status, weight and height, medical conditions, injuries, annual health examination result etc.

SOURCE OF PERSONAL DATA

The Company will collect your Personal Data directly and indirectly from the following sources:

- From you directly and verbally such as through face to face interactions, or through telephone, via documents for instance cover letter, curriculum vitae/resume, job application form, business card, contract documents, application forms for social security, provident fund, group insurance or other documents. This shall include any other

communication channel such as email, fax, online network e.g. recruitment websites in which you have provided your Personal Data for applying for a vacancy with the Company etc.

- From other sources such as recruitment agencies, persons referred to in your job application to inquire regarding your work, other organizations you have/ had worked for, government organizations, medical facility that provided your health examination, commercial bank, natural or juristic person who is your employer (in the case where you are the contractor), the parent company or affiliated companies, the representative or the proxy of shareholder (in event that you are shareholder), the shareholder (in the case of representative or the proxy), government authorities that are required by law to disclose your personal data e.g. Department of Business Development, Ministry of Commerce etc.

OBJECTIVE OF COLLECTING PERSONAL DATA

The Company shall solely collect your Personal Data for use and/or disclosure in compliance with the objectives and the legal basis under this Notice. In the case of necessity where the Company is required to collect additional Personal Data or use Personal Data for other purposes apart from the stipulated objectives within this Notice, the Company is obliged to inform you on the Personal Data collection and/or the new objectives respectively. The Company may request for additional consent on collecting, using and disclosing of your Personal Data according to the law if such consent is required by law.

OBJECTIVE OF THE COLLECTION	LEGAL BASIS
<p>1. Issue share certificates, cancel share certificates, record in the share register book, disclose details of the Company's shares to government officials as required by law, prepare instruments or share purchase agreements in the case of share transfer to other shareholders or persons or share acquisition from other shareholders or persons, and to manage and ensure that the Company's shareholders' information is correct and up to date.</p>	<p>General Personal Data</p> <ul style="list-style-type: none"> - For compliance with the laws enforced on the Company. - For the legitimate interest of the Company, or shareholders, or other persons who are transferrer or transferee of the Company's shares. <p>Sensitive Personal Data</p> <ul style="list-style-type: none"> - Request for explicit consent.
<p>2. To communicate and implement the rights and duties of the Company's shareholders such as Board of Directors' meeting, shareholders' meeting, voting, dividend payment and withholding tax deduction etc.</p>	<p>General Personal Data</p> <ul style="list-style-type: none"> - For the legitimate interest of the Company. - For compliance with the laws enforced on the Company.
<p>3. Management of the organization and operation of the Company such as a merger and acquisition, company restructuring etc.</p>	<p>General Personal Data</p> <ul style="list-style-type: none"> - For the legitimate interest of the Company.

<p>4. Record or store your data on the Company’s database as evidence for reference regarding stocks issued by the Company.</p>	<p>General Personal Data</p> <ul style="list-style-type: none"> - For the legitimate interest of the Company. - For compliance with the laws enforced on the Company. <p>Sensitive Personal Data</p> <ul style="list-style-type: none"> - Request for explicit consent.
<p>5. Protect the legitimate rights of the Company or dispute allegations against the Company such as legal action, initiation of legal proceeding, litigation, alternative dispute resolution and other proceedings to protect the legitimate rights of the Company or dispute allegations against the Company as permitted by law.</p>	<p>General Personal Data</p> <ul style="list-style-type: none"> - For the legitimate interest of the Company. <p>Sensitive Personal Data</p> <ul style="list-style-type: none"> - To establish rights to a legal claim, compliance or exercise of rights to claim as permitted by law; or for dispute allegations.

IMPACT FROM THE REFUSAL IN PROVIDING PERSONAL DATA

The Company collect your Personal Data in order that you or the shareholders who you are representing, or the proxy thereof can fulfil the legal rights and duties as a shareholder. In the event where you refuse to provide Personal Data to the Company, you or the shareholders who you are the representative or the proxy of may not be able to exercise the legal rights and duties as a shareholder.

DISCLOSING, SENDING OR TRANSFERRING PERSONAL DATA TO A FOREIGN COUNTRY

To achieve the objectives stated above, the Company may be required to disclose your Personal Data to persons or organizations including but not limited to the following:

- Customers, vendors/service providers and agents who have been hired by the Company, for instance service providers on IT system or other databases, auditors, legal consultants, business consultants, or other external expertise consultants;
- Other companies within the affiliated group and hired external service providers and agents of such affiliated company;
- Reference persons whom you have specified in the document used to collect Personal Data;
- External training agencies or organizations;

- Government agencies for instance the Social Security Office, the Revenue Department, the Ministry of Commerce, the Office of the Board of Investment, the Customs Department, the Excise Department, and the Immigration Office;
- Private sectors for instance commercial banks, insurance companies, provident fund managers, airline companies, travel companies, business card companies, SMS broadcast service companies;
- Police officers, courts, arbitrators, lawyers and persons or organizations associated with the judicial process and dispute resolution;
- Persons involved in merger and acquisition, company restructuring.

In some circumstances where it is necessary for the Company to send or transfer your Personal Data to Sumitomo Mitsui Auto Service Company Limited, which is the parent company in Japan, and other affiliated companies or other organizations situated abroad for the objectives specified above, the Company will ensure that the destination country has adequate Personal Data protection measures in conjunction with conforming to current data protection laws. Where it is necessary for the Company to send or transfer Personal Data to a country which does not have the protective measures required by law or in the event where such measures are not legally recognized, the Company is required to comply with the additional conditions stipulated in the data protection laws for sending or transferring Personal Data legally. This shall include the request for your consent if necessary or taking other appropriate measures for you to enforce your rights, for example providing effective legal remedies in accordance with the legal requirements.

Remark : the parent company in Japan has provided privacy policies which support the collection, use, and disclosure of Personal Data which you can learn more at <https://www.smauto.co.jp/en/require/privacy/index.html>

RETENTION PERIOD OF PERSONAL DATA

The Company will collect and store your Personal Data as a shareholder, an authorized representative or a shareholder proxy in order to fulfil your legal rights and duties as a shareholder of the Company. In addition, your Personal Data shall be retained for the Company to comply with laws and to manage the organization and business operations as stated above. The retention period of your Personal Data is throughout the duration of the Company's business operations and after the Company completes liquidation for a period up to a maximum of 2 years.

Nonetheless, the Company may retain all or part of your Personal Data for a duration beyond the period specified above for compliance with the law, any undertaking for debt collection, and to protect the legitimate rights of the Company, or to rebut any allegations made against the Company. In such case, the Personal Data may be retained for as long as it is necessary for the Company to abide with the specified objectives and/or for the duration stipulated by law.

RIGHTS OF DATA SUBJECT IN THE PROCESSING OF PERSONAL DATA

You have the following legal rights to your Personal Data collected by the Company:

- 1. Right on withdrawal of consent** - You may withdraw some or all of your given consent for the collection, use, and disclosure at any time throughout the period the Company keeps the Personal Data. Notwithstanding, the withdrawal of consent shall not affect the completeness or accuracy of the collection, use, or disclosure of Personal Data by the Company that the you have already given consent prior to the withdrawal;
- 2. Right to access and request for a counterpart of Personal Data** – you are entitled to request access to and obtain a copy of the Personal Data related to you, or to request the disclosure of the acquisition of the Personal Data obtained without your consent;
- 3. Right on the portability in sending or transferring of Personal Data** – you have the right to request the Company to send or transfer the Personal Data concerning you to another person pursuant to the condition prescribed by law;
- 4. Right to object on the collection, use or disclosure of Personal Data** – you are entitled to object to the collection, use or disclosure of your Personal Data by the Company pursuant to the condition prescribed by law;
- 5. Right on the erasure of Personal Data** – you have the right to request the Company to erase, destroy or anonymize the Personal Data to become anonymous data which cannot identify you pursuant to the condition prescribed by law;
- 6. Right to restrict processing of Personal Data** – you have the right to request the Company to restrict the use of your Personal Data pursuant to the condition prescribed by law;
- 7. Right on rectification of Personal Data** – you have the right to request the Company to rectify incorrect information or input data to any incomplete information;
- 8. Right to complaint** – you are entitled to file a complaint with the personal data protection committee in the event that the Company or employee or contractor of the Company violates or does not comply with the Personal Data Protection Act B.E. 2562 (2019).

In this regard, you can exercise your rights by notifying the Company in writing to the Company's contact information below. In the case where the Company may not make such request, the Company shall provide a reason on the refusal along with the response.

AN AMENDMENT OF THE NOTICE

The Company reserves the right to rectify this Notice to be in accordance with the amendment to the applicable laws and appropriateness of the business respectively. This Notice has been recently revised on 1st December 2021 and via [<https://www.smauto.co.th>].

CHANNEL AND CONTACT INFORMATION OF THE COMPANY

Sumitomo Mitsui Auto Leasing & Service (Thailand) Co., Ltd.

Address: 87/2 CRC Tower, All Seasons Place, 41th Floor, Wireless Road, Lumpinee, Pathumwan, Bangkok 10330

Email address: dpo_committee@smauto.co.th