

## **Personal Data Protection Policy**

Superrich Currency Exchange (1965) Co., Ltd. recognize the importance of protecting our valuable customer personal information. The Company strongly determines to comply with Personal Data Protection Act B.E. 2562 hence establishes this Policy to stipulate an effective and an appropriate measurement to store, collect, use and disclose of your personal information;

### **1. What kind of personal data do we collect and process**

You hereby give consent to Superrich Currency Exchange (1965) Co., Ltd to store, collect, use, process your personal data, subjected to the rights and conditions of this consent letter on personal data, as follows:

- 1) Full Name (First name, Middle name)
- 2) Surname
- 3) Personal Identification Number
- 4) Passport Number
- 5) Date of Birth
- 6) Full address (including postcode)
- 7) Contact Telephone Number or Email address
- 8) Occupation
- 9) Photo Data
- 10) Moving Image Data (retention period not exceeding 60 days)
- 11) Transactions details showing customer's personal data

### **2. Sensitivity Personal data**

The Company may obtain your sensitive personal data for the following purposes;

- (1) Biometrics data such as face/ iris/ and voice recognition, fingerprints.
- (2) Moving images from CCTV from all Superrich branches

The Company has collected the sensitive personal data for the following purposes;

- The Company collects data from Biometrics data for the purpose of conducting Know Your Customer as to identify the data subject as well as to comply with Anti-Money Laundering Regulations
- Moving image or footage obtained from CCTV from our branches are for the benefit of security in order to prevent and protect danger to a person's life, body or health including the safety of life and property of customers and employees of the Company. Signed notifications of the footage are clearly visible to inform customers of the radius of the recording range. In the event that customers wish not to give consent of the recording, customers may subsequently choose to exercise their rights by notifying the Company to delete of such data. The process details of how to withdraw consent or exercise your rights and the channels are included herewith.

### **3. Store, Collect, Use, and Process of personal data Purposes**

The Company store, collect, use, and process of personal data for the following purposes;

- To conduct Know Your Customer verification as well to comply with laws, regulations or regulations of regulatory agencies, such as the Anti-Money Laundering Act of 1999, as well as the Anti-Money Laundering, and Counter Terrorism Financing and Proliferation of Weapons of Mass Destruction Acts and others related Regulations.
- To act as legal evidence of legal actions processing transactions on foreign currencies exchange.
- To benefit customers in terms of promotion, publications, news, invitation to join the social events, business offers, activities, opportunities, promotional gifts or to enjoy the novel services.
- To promote Company products or services.
- To act as a channel to receive customer's suggestions to improve and develop the Company products and services.
- To contribute and operate other related matters in regards to the above.

#### **Collection of personal data from different sources**

The company will personally obtain customer personal data and will never obtain data via other means. Nonetheless, for customer's convenience, future verification may be processed via NDID system, the system of which governed by the Bank of Thailand. Customers (Data subject), therefore, instructed to priory given consent to financial institutes or NDID providers, authorising that their data can be passed to third party as acceptable means of verification. Furthermore, the Company is whole purposedly conformed to Data Protection Acts, section 24 (6) where data controller shall comply with a law to which data controller is subjected.

#### **Collection of data on our website**

##### **Cookies**

Cookies program is introduced to some of our web pages, it is harmless to your computer and does not contain any viruses. Cookies is user-friendly, and securely effective. Cookies are small, unidentified texts files that websites place and store in your browser, most of the cookie programs that we use are called "Cookies". These product optimizations will help to improve user experience to navigate through our website and will automatically deleted once you exit our website. However, these deletions only refer to our website cookies and does not imply to other cookies that previously stored in your devices. Our cookies will recognize data and behavior to maintain user's preferences for future visit in accordance to frequency and interest whilst maintaining and improving a service via data relating to a user's session. Your web browsers can configure to, automatically accept or reject cookies under certain conditions, for more information on how to control cookies, check your browser or device's settings for how you can control or reject cookies. Nonetheless, disabling cookies may limit the functionality of our website.

## **Minor's Personal Data**

Where collecting personal data involves a minor (a person under the age of 20) for which purposes that require co-consent of legal representative, the Company will also determine necessary steps to request consent of the data subject's legitimate representatives of the latter to accompany the former's consent.

## **4. Data Processing**

4.1 The Company will use your personal data for the following aspects;

- The Company has the rights to lawfully process customer's personal data to exercise and assess risk as defined by Anti-Money Laundering legislation hence to proceed against name screening with designated person list, as to comply with Prevention and Suppression on Anti-Money Laundering and Counter Terrorism Financing and Proliferation of Weapon of Mass Destruction Law.
- The Company has a duty to submit customer's personal data and transactions data to the Bank of Thailand in accordance to the Bank's standardized format.
- The Company has collected customer's personal data for trend analysis and statistics as well as planning on other related business activities for products and/ or services improvement.
- The Company has collected customer's history records via website, mobile application including related programs to further improve user's experience.
- The Company has collected statistics on customer's transactions and services for tax purposes.

4.2 Company can share, transmit or transfer customer's personal data to business affiliate, business partners or data processor in the following aspects;

- The Company will only transmit or transfer customer's personal data to business affiliate whom we share our business relationship and joint venture, for example, e-wallet product.
- The Company is obliged to submit customer's personal data where necessary to verify against designated person list and other criminal records as require by laws and to comply with legislation, to mitigate risk on Anti-Money Laundering.

## **5. Personal Data retention period**

The Company will not retain your personal data for longer period than necessary; for the purpose of retention according to Civil Law cases is 10 years

In case of sensitive data such as moving images from CCTV, the Company will retain the data for the period of 30 days from recording.

## **6. Disclose of Personal Data**

The Company will not disclose your personal data for other purpose unless the Company has been legitimately ordered or required to perform such duties, for examples;

- The Company has duties to disclose customer's processed transactions to Anti- Money Laundering Office in accordance to their guidelines
- The Company has duties to disclose customer's processed transactions (both buy and sell of foreign currencies) to the Bank of Thailand in accordance to Foreign Currency Exchange Law.

The Company may disclose your personal data to our authorised agents or affiliates to co-promote and improve business services as stated in the contract.

## **7. Cross Border data transmit or transfer**

- The Company will not transmit or transfer customer's personal data to any third parties or other business entities without your consent to do so, and
- The Company will not transmit or transfer customer's personal data to any third parties or other business entities abroad unless transmit or transfer to our business partners, to whom we share our business relationship and customer based hence to provide mutual benefit of our customers, and
- Should the Company have duty to disclose or transmit/ transfer your personal data to third parties as mentioned above, the Company will ensure that the destination countries have strictly conducted the standard security level of Personal Data Protection as described by law.

## **8. Customers' rights in relation to their personal data and how to exercise them**

Further to customer's consent to lawfully store, collect, use, disclose of personal data, customer will subsequently have the following rights regarding their personal data:

- Right to withdraw prior consent

Further to data's subject consent, the data subject has the right to withdraw the prior giving consent of use or disclose of personal data at any time unless revocation has direct legal or contractual impact to data subject's beneficiary. Withdrawal must not affect the statutory rights of any processing we conducted prior to your withdrawal. The Company is suggested to inform the data subject of any effect or non-beneficial should the consent has been withdrawn.

- Right to access and obtain a copy of personal data

The data subject has the right to request disclose of any data that the Company might have obtained without data subject's acknowledgment or consent.

- Right to transfer their personal data to another data controller

Although this is not in principle of the Company's policy, the data subject may specifically express and give consent to the Company to transfer their personal data to another data controller (whether in writing or through an electronic system). The data subject

may request that their data to be transferred or transmitted directly to another data controller to reuse for their own purposes. This personal data must be in the usual form, method, commonly used or in machine-readable format that are allowed to be disclosed or used legally in the safe and secure way.

- Right to object the collection, use, process or disclose of their data

The data subject has the right to object the collection, use, process or disclose of their data of which those data will not affect the statutory rights or defend legal rights to any law enforcement body or opposed as legitimate evidence for alleged cases that may occur between the Company and their customers within legislation period.

- Right to erase, destroy, or anonymize their personal data

The data subject has the right to erase, destroy, or anonymize their personal data in certain ways such as;

- the personal data has reached its completion of detention period and data controller subsequently no longer can retain such data to exercise or defend legal claims hence proceeding to delete, destroy or make the data anonymous.
- Should the data subject exercise the right to withdraw their prior consent to collect, use and disclosure of that data, the data controller shall refrain from collecting, using, or disclosing of such data, and must proceed to delete, destroy or otherwise make data anonymous.
- The data subject may choose to exercise the right to object their prior consent to collect, use and disclosure of that data. The data controller does not have any rights to reject data subject's request should the data subject has a strong belief that the Company collects, uses, discloses of data unlawfully.

Nonetheless, the Company may object to the exercise of this right if the collection, usage and disclosure of personal data is compiled by court of law or maintain litigation evidence for alleged cases that may occur between the Company and their customers within legislation period.

- Right to restrict the use of their personal data

The data subject has the rights to restrict the processing of their personal data for the following circumstances;

- The data subject's data is pending accuracy verification by the Company
- The data subject may request the Company to withhold their personal data not to be used or disclosed while waiting for their data being validated to avoid further misunderstanding.
- The processing of personal data is unlawful but data subject opposes to the erasure of their personal data and requests the restriction of their use instead
- Personal data has reached the retention period hence data controller abides by laws to erase and destroy such personal data but data subject prefers the Company to withhold of their data instead of removing or deleting. The data subject may foresee such data as evidences hence might be beneficial for a legal claim or in the process of alleged case against them.
- Data subject objects data controller's collection/ usage/ disclosure of their data but data controller is in the process of investigating the data subject's rights against objection

- Right to have personal data maintained accurately

The data subject has the right to have personal data maintained accurately and that the controller must ensure that the personal data which it has collected and kept remains accurate and up-to-date and is not misleading.

- Right to file a complaint

The data subject has the right to file a complaint to Expert Committee and/ or to the Personal Data Protection Commission Office where the data subject has requested the data controller to exercise the above rights but the data controller refuses or does not perform as requested, neither unlawfully comply with applicable data protection laws.

#### **How to exercise your rights**

Customers can exercise their rights via following channels;

- (1) Submit consents in writing at the Company's office or at our available branches
  - 67-69 Ratchadamri Rd. (Soi 2), Lumpini, Patumwan, Bangkok 10330 Thailand
  - 491/5-7 Silom Plaza Building, Silom Rd. Silom, Bangrak, Bangkok 10500 Thailand
- (2) Submit consents electronically via our website, social network or other available channels

Processing period guidance

Your rights	Processing period
Right to withdraw prior consent	7 days
Right to access and obtain a copy of personal data	30 days
Right to transfer their personal data to another data controller	
Right to object the collection, use, process or disclose of their data	
Right to erase, destroy, or anonymize their personal data	
Right to restrict the use of their personal data	
Right to have personal data maintained accurately	

## **9. Withdrawal of consent**

Withdrawal consent to store, collect, use, disclose of personal data may result in the following;

- You withdraw your prior consent to personal data that the Company stored, collected, used, disclosed for other purposes beyond your consent or permitting to process by court of law.
- You may not receive the news on any benefits, publications, invitation to join the social events, business offers, activities, or special opportunities, promotional gifts, novel services, etc.
- You may not receive the news on Company's products or services
- The Company is not able to receive customer's suggestions to further improve and develop the Company products and services.
- The Company may not be able to process your requests in relation to the above purposes especially those that might be beneficial to you.

## **10. How do we protect your personal data**

The company ensures to store customer's personal data by means of electronic data, of which the Company has a measurement system that processes data accurately with strong safeguard while maintaining high level of security to prevent personal data infringement. The Company has established policies and practices on how to prevent employees from confiscating customer data from the Company's system. There are Security measures of the Company's electronic database, strict agreement with business partners regarding the protection of the customer's personal data, including regulations for employees and personnel to maintain the confidentiality of customer personal data.

## **11. How to contact Data Protection Officer**

You are more than welcome to contact us to exercise your rights in relation to the protection of your personal data that the Company stores, collects, uses or disclose, or if you have further queries about the Company policy, please contact the Company or the Company's Data Protection Officer at;

Data Protection Officer's office: Silom Plaza Branch

Contact number: (direct line) 02-057-8818, or contact our call center 02-057-8888 or 02-057-8899 ext. 5302

Email: [DPO@superrich1965.co.th](mailto:DPO@superrich1965.co.th)