

Privacy Notice Mahisorn Company Limited

We, Mahisorn Company Limited (“**the Company**”), care about your privacy, thus, we provide this privacy notice to inform you of our policy in relation to the collection, use and disclosure of personal data in accordance with the Personal Data Protection Act B.E. 2562 (“**PDPA**”), and an amendments thereof, relevant laws and regulations. This privacy notice informs you of how we collect, use or disclose your personal data, what and why we collect, use or disclose your personal data, how long we hold it, who we disclose it to, your rights, what steps we will take to make sure your personal data stays private and secure, and how you can contact us.

This privacy notice applies to:

(1) Our customers

- **Individual customers:** Customers who have products or services with the Company, including former and existing customers who are individual.
- **Corporate customers:** Directors, shareholders, ultimate beneficial owners, employees, guarantors, security providers, and legal representatives of our former and existing corporate customers and other individuals authorized to act on their behalf. Our corporate customer shall ensure that the authorized persons and any of relevant individuals have acknowledged our privacy notice.

(2) Non-customers

These include individuals who have no product or service holding with us, but we may need to collect, use or disclose your personal data (e.g., persons who have made payments or transferred funds to, or received funds from, the Company’s customers; persons who have accessed services at our office; ultimate beneficial owner; directors or legal representatives of a company that uses our services; professional advisors, including our directors, investors, shareholders and their legal representatives, and anyone involved in other transactions with us or our customers).

1. How we collect, use or disclose your personal data

We only collect, use or disclose your personal data where it is necessary or there is a lawful basis for collecting, using or disclosing it. This includes where we collect, use or disclose your personal data based on the legitimate grounds of legal obligation, performance of contract made by you with us, our legitimate interests, performance under your consent and/or other lawful basis. Reasons for collecting, using or disclosing are provided below:

1.1. Our legal obligation

We are regulated by many laws, rules, regulations, and orders of any competent governmental, supervisory or regulatory authorities, and to fulfil our legal and regulatory requirements, it is necessary to collect, use or disclose your personal data for the following purposes, which include but not limited to:

- a) Compliance with the PDPA and any amendment thereof;
- b) Compliance with laws (e.g. Financial Institution Business Laws, Anti-Money Laundering Laws, Prevention and Suppression of Financial Support to Terrorism and the Proliferation of Weapons of Mass Destruction Laws, Public Limited Companies Laws, Life and Non-life Insurance Laws and other laws to which we are subject both in Thailand and in other countries), including conducting identity verification, background checks and credit checks, Know Your Customer (KYC) process, Customer Due Diligence (CDD) process, other checks and screenings (including screening against publicly available database of regulatory authorities

and/or official sanctions lists), and ongoing monitoring that may be required under any applicable law; and/or

- c) Compliance with regulatory obligations and/or orders of authorized persons (e.g. orders by any court of competent jurisdiction or of governmental, supervisory or regulatory authorities or authorized officers)

1.2. Contract made by you with us

We will collect, use or disclose your personal data in accordance with the request and/or agreement made by you with us, for the following purposes, which include but not limited to:

- a) process your request prior to entering into an agreement, consider for approval and execute transactions or provide products and/or services, deliver products and/or services to you, provide advice and deal with all matters relating to products and/or services including any activities that if we do not proceed, then our operations or our services may be affected or may not be able to provide you with fair and ongoing services;
- b) authenticate when entering into, doing or executing any transactions;
- c) carry out your instructions (e.g. processing your applications and/or your transactions, fulfilling a request for execution of transactions or utilization of products and/or services, responding to your enquiries or feedbacks, or resolving your complaints);
- d) track or record your transactions;
- e) produce reports (e.g. transaction reports requested by you or our internal reports);
- f) notify you with transaction alerts and notify the due date of products and/or services;
- g) recover the money which you owe (e.g. when you have not paid for your debt and/or outstanding fees);
- h) carry out or make transactions and/or payments (e.g. processing payments or transactions, fulfilling transactions, conducting settlement, billing and processing activities, and managing and administering your relationship with us);
- i) enforce our legal or contractual rights;
- j) provide IT and helpdesk supports, create and maintain codes and user accounts for you, manage your access to any systems to which we have granted you access, and remove inactive accounts; and/or
- k) in the event of sale or transfer of claims, assets, debt or business, merger, reorganization, rehabilitation, or similar event, we may disclose and transfer your personal data to one or more third parties who are the transferees of claims, assets, debt, or business, or the parties involved in the merger or reorganizing, or the plan preparers and plan administrators, or those related to such similar event

1.3. Our legitimate interests

We rely on the basis of legitimate interests by considering our benefits or third party's benefits with your fundamental rights in personal data which we will collect, use or disclose for the following purposes, which include but not limited to:

- a) conduct our business operationthe business operation of companies in SCBX Group as specified in <https://www.scbx.com/en/affiliates-financial-business-group/> and the business operation of SCBX Group (e.g. to govern, to audit, to conduct risk management in business operations and internal management, to manage and audit financial and accounting, to conduct information technology and cybersecurity management, to conduct procurement management, to conduct human resource management, to define guidelines and strategic planning for operations, to conduct debt restructuring and manage the risks of customers of the companies in SCBX Group, to monitor, prevent, and investigate fraud, money laundering, terrorism, misconduct,

or other crimes, including but not limited to carrying out the creditworthiness checks of any persons related to our corporate customer, which may not be required by any governmental or regulatory authorities, and authenticating your identity to prevent such crimes);

- b) conduct our relationship managements (e.g. to serve and facilitate you, to conduct survey, to manage customer segmentation, to handle complaints, etc.);
- c) ensure security (e.g. to maintain CCTV records, to register, to exchange identification card and/or to take photo of visitors before entering into our building areas);
- d) develop and improve our products, services and systems to enhance our services standard, and/or for the greatest benefits in fulfilling your needs, including to conduct research, analyze data and offer products, services and benefits suitable to you by considering the fundamental rights in your personal data. If you do not wish to receive the offering of products, services and benefits from us, you can contact us, details as specified in No.11;
- e) record images, videos, and/or voices relating to the meetings, trainings, seminars, recreations or marketing activities and use such recorded images, videos and/or voices for the purpose of making internal and/or external public relations relating to such meetings, trainings, seminars, recreations or activities, whether internally and/or externally of the Company;
- f) in case of our corporate customer, we will collect, use and disclose personal data of directors, authorized persons or attorneys;
- g) ensure business continuity of the Company, companies within SCBX Group, and SCBX Group as a whole;
- h) handle claims and disputes, file lawsuits and process the relevant legal proceedings;
- i) contact you prior to your entering into a contract with us;
- j) protect against security risks (e.g. monitoring network activity logs, detecting security incidents, conducting data security investigations, and otherwise protecting against malicious, deceptive, fraudulent, or illegal activity);
- k) comply with applicable foreign laws;
- l) analyze, carry out research, plan and conduct statistical analysis (e.g. data analytics, assessments, surveys and preparations of reports on our products and/or services and your behavior, usage location and usage history);
- m) organize our promotional campaigns or events, conferences, seminars, and company visits;
- n) facilitate financial audits to be performed by auditors;
- o) receive advisory services from legal counsels, financial advisors, and/or other advisors appointed by you or us;
- p) in the event of sale, transfer, merger, reorganization, or similar event, or if such an action is contemplated, disclose and transfer your personal data to one or more third parties as part of that transaction;
- q) maintain and update lists and directories of the customers (including your personal data) and keep contracts and associated documents in which you may be referred to; and/or
- r) comply with reasonable business requirements (e.g. management, training, auditing, reporting, control or risk management, statistical and trend analysis and planning or other related or similar activities, implementing business controls to enable our business to operate, and enabling us to identify and resolve issues in our IT systems to keep our systems secured, performing our IT systems development, implementation, operation and maintenance)

1.4. Your consent

In certain cases, we may ask for your consent to collect, use or disclose your personal data to maximize your benefits and/or to enable us to execute transactions or provide services to fulfil your needs.

1.5. Other lawful basis

Apart from the lawful basis which we mentioned earlier, we may collect, use or disclose your personal data based on the following lawful basis:

- a) prepare historical documents or archives for the public interest, or for purposes relating to research or statistics;
- b) prevent or suppress a danger to a person’s life, body or health; and/or
- c) necessary to carry out a public task, or for exercising official authority

If the personal data we collect from you is required to meet our legal obligations or to enter into an agreement with you, we may not be able to execute transactions with you or to provide (or continue to provide) some or all of our products and services to you if you do not provide such personal data when requested.

In addition, the Company may utilize technologies currently possessed or to be acquired in the future for the collection, use, or disclosure of your personal data in accordance with the purposes stated in clauses 1.1 – 1.5 above, including, but not limited to, Artificial Intelligence (“AI”), Generative AI Usage, such as AI Chatbot technology, Cloud Computing, etc.

Furthermore, the Company may establish the system(s) and/or use systems jointly with companies within SCBX Group to support operations and business activities for shared use within SCBX Group and may collect, use, or disclose your personal data held by the Company and the companies in SCBX Group through such system(s) in accordance with the PDPA.

2. What personal data we collect, use or disclose

The type of personal data, namely personal data and sensitive personal data, which we collect, use or disclose, varies on the scope of products and/or services that you may have used or had an interest in. The type of personal data shall include but not limited to:

Category	Examples of personal data
Personal details	<ul style="list-style-type: none">● Title● Given name, middle name, surname, hidden name (if any)● Gender● Date of birth● Nationality
Contact details	<ul style="list-style-type: none">● Mailing address● Current address● Address as shown on the national identification card● Electronic address● Telephone number● Mobile phone number● Facsimile number● Name of the customer’s representative or authorized person acting on behalf of the Company’s customer● Business contact address

Category	Examples of personal data
	<ul style="list-style-type: none"> ● Business contact telephone number ● Contact details of a reference person
Identification and authentication details	<ul style="list-style-type: none"> ● Photo ● ID card photo ● National identification number, Laser ID (printed on the back of the national identification card) ● Passport information ● Driving licence ● Signatures ● Tax identification number ● House registration
Financial details and information about your relationship with us	<ul style="list-style-type: none"> ● Information regarding the products and/or services you use (e.g., space rental) ● Channels and methods through which you interact with the Company ● Your customer status, payment history, and transaction records ● Information relating to your transactions
Market research and marketing information	<ul style="list-style-type: none"> ● Customer surveys ● Information and opinions expressed by you when participating in market research (e.g., your responses to questions, questionnaires, feedback requests, and research activities) ● Details of the services you receive and your preferences ● Conclusions or profiles about you derived from communications between you and the Company ● Your preferred communication methods, and details or content of communications between you and the Company
Investigation data	<ul style="list-style-type: none"> ● Due diligence checks, including information related to Know Your Client (KYC) or Customer Due Diligence (CDD) ● Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) checks
Information concerning security	<ul style="list-style-type: none"> ● Visual images ● Personal appearance ● Detection of any suspicious and unusual activity ● CCTV images or recordings ● Video recordings
Sensitive personal data	<ul style="list-style-type: none"> ● Religion as shown in the national identification card ● Blood type as shown in the national identification card
Other data	<ul style="list-style-type: none"> ● Records of correspondence and other communications between you and us, in whatever manner and form, including but not limited to phone, email, live chat, instant messages and social media communications ● Information that you provide to us through any channels

3. Sources of your personal data

Normally, we will collect your personal data directly from you, but sometimes we may get it from other sources, in such case we will ensure the compliance with the PDPA.

Personal data we collect from other sources may include but not limited to:

- a) Data obtained by us from companies in SCBX Group, business partners, and/or any other persons who we have relationship with;
- b) Data obtained by us from persons related to you (e.g. your family, friends, referees);
- c) Data obtained by us from corporate customers as you are director, authorized person, attorney, representative or contact person; and/or
- d) Data obtained by us from governmental authorities, regulatory authorities, financial institutions, credit bureau and/or third-party service providers (e.g. data that is publicly available, data that relates to transactions, credit data)

In case you have given any personal data of any other person to us for executing transactions with us or any purposes, you shall notify such person of the details relating to the collection, use and disclosure of personal data and rights under this privacy notice. In addition, you shall obtain consent from such person (if necessary) or relied on another legal basis to provide personal data to us.

4. Your rights

The PDPA aims to give you more control of your personal data. You can exercise your rights under the PDPA, details as specified below, through the channels prescribed by us:

4.1 Right to access and obtain copy

You have the right to access and obtain copy of your personal data holding by us, unless we are entitled to reject your request under the laws or court orders, or if such request will adversely affect the rights and freedoms of other individuals.

4.2 Right to rectification

You have the right to rectify your inaccurate personal data or to update your incomplete personal data.

4.3 Right to erasure

You have the right to request us to delete, destroy or anonymize your personal data, unless there are certain circumstances where we have the legal grounds to reject your request.

4.4 Right to restrict

You have the right to request us to restrict the use of your personal data under certain circumstances (e.g. when we are pending examination process in accordance with your request to rectify your personal data or to object the collection, use or disclosure of your personal data, or you request to restrict the use of personal data instead of the deletion or destruction of personal data which is no longer necessary as you have necessity to retain it for the purposes of establishment, compliance, exercise or defense of legal claims).

4.5 Right to object

You have the right to object the collection, use or disclosure of your personal data in case we proceed with legitimate interests basis or for the purpose of direct marketing, or for the purpose of scientific, historical or statistic research, unless we have legitimate grounds to reject your request (e.g. we have compelling legitimate ground to collect, use or disclose your personal data, or the collection, use or disclosure of your personal data is carried out

for the establishment, compliance, or exercise legal claims, or for the reason of our public interests).

4.6 Right to data portability

You have the right to receive your personal data in case we can arrange such personal data to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means. Also, you have the right to request us to send or transfer your personal data to third party, or to receive your personal data which we sent or transferred to third party, unless it is impossible to do so because of the technical circumstances, or we are entitled to legally reject your request.

4.7 Right to withdraw consent

You have the right to withdraw your consent that has been given to us at any time pursuant to the methods and means prescribed by us, unless the nature of consent does not allow such withdrawal. The withdrawal of consent will not affect the lawfulness of the collection, use or disclosure of your personal data based on your consent before it was withdrawn.

You can review and change your consent to use or disclose your personal data for marketing purposes through channels as specified in No. 11 or other channel prescribed by us in the future.

4.8 Right to lodge a complaint

You have the right to make a complaint with the Personal Data Protection Committee or their office in the event that we do not comply with the PDPA.

5. **How we share your personal data**

We may disclose your personal data to the following parties under the provisions of the PDPA:

- a) financial business group companies, business partners and/or other persons that we have the legal relationship, including our directors, executives, employees, staffs, contractors, representatives, advisors and/or such persons' directors, executives, employees, staffs, contractors, representatives, advisors;
- b) governmental authorities and/or supervisory or regulatory authorities (e.g. the Bank of Thailand, Ministry of Digital Economy and Society, Thai Revenue Department);
- c) suppliers, agents and other entities (e.g. professional associations to which we are member, external auditors, depositories, document warehouses, overseas financial institutions and clearing houses), where the disclosure of your personal data has a specific purpose and under lawful basis, as well as appropriate security measures;
- d) any relevant persons as a result of activities relating to selling rights of claims and/or assets, restructuring or acquisition of any of our entities, where we may transfer their rights to; any persons with whom we are required to share data for a proposed sale, reorganization, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
- e) other banks, financial institutions and third parties where required by law;
- f) debt collection agencies, lawyers, fraud prevention agencies, courts, authorities or any persons whom we are required or permitted by laws, regulations, or orders to share personal data;
- g) third parties providing services to us (e.g. service providers in relation to customer service, IT service providers, market analysis and benchmarking service providers, cloud computing service providers, agents and subcontractors acting on our behalf);

- h) social media service providers (in a secure format) or other third-party advertisers so they can display relevant messages to you and others regarding the Company's products and services, whereby such external advertising companies may use your online activity history to deliver advertisements that may be of interest to you;
- i) third-party security providers;
- j) other persons that provide you with relevant benefits or services associated with your services; and/or
- k) your attorney, sub-attorney, authorized persons or legal representatives who have lawfully authorized power

6. International transfer of personal data

The nature of our business is global and under certain circumstances it is necessary for us to send or transfer your personal data internationally (e.g. transferring data to companies in SCBX Group or to cloud server overseas for the purpose of the provision of services). When sending or transferring your personal data, we will always exercise our best effort to have your personal data transferred to our reliable business partners, service providers or other recipients by the safest method in order to maintain and protect the security of your personal data.

In the event that the destination country does not have adequate personal data protection standards, we will ensure that the sending or transfer of personal data complies with the requirements of the PDPA, and will implement measures for personal data protection deemed necessary and appropriate to ensure that your personal data is protected under standards equivalent to those in Thailand, such as entering into agreements with the data recipient to stipulate personal data protection with adequate security standards

7. Retention period of personal data

We will maintain and keep your personal data while you are our customer and once you have ended the relationship with us (e.g. after you have closed your existing account with the Company, after completing transactions with the Company, in cases where the Company rejects your request for services, or where you cancel the use of the Company's services after you terminated the services provided by us), we will only keep your personal data for a period of time that is appropriate and necessary for each type of personal data and for the purposes as specified by the PDPA.

We keep your personal data in accordance with the prescription period or the period under the relevant laws and regulations (e.g. Financial Institutions Businesses Laws, , Anti-Money Laundering Laws, Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Laws, Accounting Laws, Tax Laws, Labor Laws and other laws to which we are subject both in Thailand and in other countries). In addition, we may need to retain records of CCTV surveillance in our office and/or voice records to prevent fraud and to ensure security, including investigating suspicious transactions which you or related persons may inform us.

8. Use of personal data for original purposes

We are entitled to continue collecting and using your personal data which has previously been collected by us before the effectiveness of the PDPA in relation to the collection, use and disclosure of personal data, in accordance with the original purposes. If you do not wish us to continue collecting and using your personal data, you may notify us to withdraw your consent at any time.

9. Security

We endeavor to ensure the security of your personal data through our internal security measures and strict policy enforcement, including data encryption and access control measures. We also require our staffs and third-party contractors to follow our applicable privacy standards and policies and to exercise due care and measures when using, sending or transferring your personal data.

10. How to contact us

If you have any questions or would like more details about our privacy notice or would like to exercise your rights, please contact us through the following channels:

- **Mahisorn Company Limited**

The Company's head office is located at 18–19 SCB Park Plaza, Ratchadaphisek Road, Chatuchak Sub-district, Chatuchak District, Bangkok 10900, Thailand

- **our Data Protection Officer** by writing to E-mail: dpo@scb.co.th or our address as specified above.

If you would like to exercise your rights in accordance with PDPA, please contact us through our head office and/or our Data Protection Officer through channels or address provided above.

11. Changes to this privacy notice

We may change or update this privacy notice from time to time and we will inform the updated privacy notice by posting the updated privacy notice at our office premise or through your contact details provided to us.

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