Privacy Notice of the Thai Bond Market Association

1. Introduction

Thai Bond Market Association (the "Association") shall use your personal data in order to achieve the Association's intention to provide services with the highest standard and efficiency. In this regard, the operation of the Association is aimed at protecting the privacy of the personal data collected, used and/or disclosed by the Association.

This Privacy Notice (the "**Notice**") is made to inform you as the data subject of the objectives and details of collection, use, and/or disclosure of the personal data as well as your rights under the law regarding the personal data.

2. Application

The Association shall apply this Notice for processing the personal data with respect to:

- "Member(s) of the Association" means an employee, director, or representative of the ordinary member, extraordinary member, and associate member.
- "Data User(s) of the Association" means an employee, director, or representative of a Data User of the Association such as IBOND, IRISK, E-Bookbuilding, Smart Funding Solution services, etc.
- "Attendee(s)" means an attendee of a training, seminar, or other activities organized by the Association, whether organized inside or outside the Association.
- "Registered User(s)" means an employee, director, or representative of an issuer of debt securities or an authorized person of an issuer of debt securities.
- "Registered Trader(s)" means an examination candidate to be a Registered Trader or trader registered with the Association.
- "Counterpart(s) of the Association" means an employee, director, or representative of a supplier or service provider of the Association.

A reference to "You" or "Your" herein shall be referred to a person whose personal data has been processed by or on behalf of the Association.

3. Your personal data collected by the Association

Your personal data shall include any information relating to you, which can identify your identity, but not include the personal data which cannot identify the data subject (anonymous data).

Sensitive data shall include your personal data relating 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 affect you in the same manner, as

prescribed by the Personal Data Protection Committee. The Association may collect sensitive data in a restricted case such as criminal records, etc.

Please consider the details of data collection for the said case in the heading "Objectives and the lawful basis for using your personal data" and the heading of "How to use your personal data".

The Association shall collect your personal data for fulfilling the abovementioned paragraphs as follows:

Information used for entering into a contract with a party:

- Personal data contained in the company's affidavit issued by the Department of Business Development, the Ministry of Commerce such as name and surname of the director(s), etc.
- Information contained in an identity card or other identifying documents such as name and surname, identity card number, date of birth, address, a photograph of the cardholder, etc. The Association shall collect only relevant information.
- Information necessary for providing services of the Association such as telephone number, E-mail, and address.

Basic information:

Name, surname, sex, ID card no., passport no., photograph, and educational background.

Contacting information:

E-mail, Telephone number, current address, and contacting address.

Occupational information:

Occupation, position, workplace, contacting details of the workplace, and working experience.

Sensitive data:

Race, criminal records, health information, disability, or other information as specified by the Personal Data Protection Committee.

Information acquired from activity participation:

Photograph, video, audio record, satisfaction survey result, and registration information.

Information obtained from lectures in courses organized by the association:

Photo, clip videos, sound recordings, lecture information in course and/or seminar organized by the Association.

4. Objectives and the lawful basis for processing your personal data by the Association

Objectives and the lawful basis for the Association's processing of your personal data:

• The Association shall indicate details regarding the processing of your personal data and lawful bases used for processing such data according to the tables attached hereto. The Association shall also indicate its legitimate interests used as the base for processing your personal data in relevant cases.

• The Association may process your personal data based on a lawful basis which may be more than one lawful base, depending on the objectives of such processing of your personal data in each case. Please contact the Association and Member Development Department if you require additional information regarding the lawful basis the Association has relied on to process your personal data in the event that it relies on the lawful basis of more than one base according to these tables.

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To identify your identity or your authority to act on behalf of the company of the Member of the Association.	 Information used for entering into a contract with a party 	• For complying with a contract, to which the data subject is a party or to fulfill the request of the data subject before entering into such contract
To manage fee payments, debt collections, and collections and records of accounting and tax information.	 Information used for entering into a contract with a party 	For contract complianceFor legal compliance
To process personal data in accordance with the objectives of the Regulations of the Association and the Notifications of the Board of Directors of the Thai Bond Market Association, as well as to comply with the law such as attending meetings with the Association, arranging annual general meetings (AGM), nominating a person to be appointed as a director, subcommittee, appointing a representative of the members of the registered traders, liaising to notify changes of information between the Association and the Members in accordance with the rules, conditions, and method as specified by the Association.	 Basic data Information used for communication Occupational information 	 For contract compliance For legal compliance For legitimate interests
To contact and liaise between the Association and the Member regarding activity invitations organized by the Association to the Member such as corporate social responsibilities (CSR), etc., to publicize training courses and seminars organized by the Association, to deliver documents, supplies, and opinion survey forms to be filled in to enable the Association to improve and develop its services to you better as well as to arrange awarding and other activities to you.	 Basic data Information used for communication Occupational information Information acquired from activity participation 	• For legitimate interests

Part of Members of the Association

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To record conversations as evidence for notification,	• Basic data	• For legitimate interests
revision, or cancellation of lists from the Members as	• Information acquired from	
well as inquiries of Thai band market conditions.	activity participation	

Part of Users of the Association such as IBOND, IRISK, E-Book building, Smart Funding Solution

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To accept you becoming a new User as well as to check other preliminary information, etc., and to identify your identity or your authority to act on behalf of the company.	 Information used for entering into a contract with a party 	• For complying with a contract, to which the data subject is a party or to fulfill the request of the data subject before entering into such contract
To manage fee payments, debt collections, and collections and records of accounting and tax information. To provide services to the Users such as issuing Username and Password to use the system to you and to inform changes of information between the Association and the Users.	 Information used for entering into a contract with a party Basic data Occupational information 	 For contract compliance For legal compliance For contract compliance
To contact and liaise between the Association and you regarding activity invitations organized by the Association to the Users such as corporate social responsibilities (CSR), etc., to publicize training courses and seminars organized by the Association, to deliver documents, supplies, and opinion survey forms to be filled in to enable the Association to improve and develop its services to you better as well as to arrange awarding and other activities to you.	 Basic data Information used for communication Occupational information Information acquired from activity participation 	• For legitimate interests

Part of Attendees

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To confirm your identity and to provide you services of the training and seminar arrangements, to facilitate you to join activities or seminars through our channels, or to facilitate you to access our online courses of the Association.	 Basic data Information used for communication Occupational information 	For contract complianceFor legitimate interests

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To manage fee payments, debt collections, and collections and records of accounting and tax information.	 Information used for entering into a contract with a party 	For contract complianceFor legal compliance
To deliver to lecturers of each course for improving the contents, lectures, and lecture methods to be appropriate to groups of Attendees.	Occupational information	• For legitimate interests
To deliver to the Stock Exchange of Thailand and/or the Office of the Securities and Exchange Commission for collecting credit hours for renewal of the license of personnel in the capital market.	 Basic data Information used for communication Information acquired from activity participation 	 Consent basis (The Association can use the personal data only if you has given consent) *in accordance with the guideline of the Thai Capital Market Knowledge Development Center
To use for assessment of achievement of the training arrangements, and to improve the style of activity arrangements.	 Occupational information Information acquired from activity participation 	• For legitimate interests
To contact and liaise between the Association and you regarding public relations of training courses and seminars organized by the Association and to invite you to join activities organized by the Association, to deliver documents, supplies, and goods, or rewards, including opinion survey forms to be filled in to enable the Association to improve and develop its services to you better.	 Basic data Occupational information Information acquired from activity participation 	• For legitimate interests
To use photographs or video clips produced from the event arrangements for the purpose of public relations thereof through channels of the Association.	 Information acquired from activity participation 	 Consent (excluding the case of photographs or videos)
Lecture information, photos, or video clips from the training and seminar to be used in the development of the Association' s professional Training course.	 Information and material obtained from lectures in training and/or seminar organized by the Association. Information acquired from activity participation. 	• Consent

Part of Registered Users

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To accept you becoming a new User as well as to check other preliminary information, etc., and to identify your identity or your authority to act on behalf of the entity.	 Information used for entering into a contract with a party 	 For complying with a contract, to which the data subject is a party or to fulfill the request of the data subject before entering into such contract Public task
To manage fee payments, debt collections, and collections and records of accounting and tax information.	 Information used for entering into a contract with a party for contract compliance 	For legal complianceFor legitimate interests
To provide services to the Users such as issuing Username and Password to use the system to you and to inform changes of information between the Association and the Users.	Basic dataOccupational information	• For contract compliance
To contact and liaise between the Association and you regarding activity invitations organized by the Association to the Users such as corporate social responsibilities (CSR), etc., to publicize training courses and seminars organized by the Association, to deliver documents, supplies, and opinion survey forms to be filled in to enable the Association to improve and develop its services to you better.	 Basic data Occupational information Information used for communication Information acquired from activity participation 	• For legitimate interests

Part of Registered Traders

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To take bond trader examinations for registration and to analyze the examination achievement in order to improve the examination to be more proficient.	 Basic data Occupational information Information acquired from activity participation 	For contract complianceFor legitimate interestsGovernment mission
To manage fee payments, debt collections, and collections and records of accounting and tax information.	 Information used for entering into a contract with a party 	For contract complianceFor legal compliance

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To register as a Bond Trader registered with the Association which shall use a criminal record to check that he/she is not a disqualified person who is prohibited to be a part of the personnel in the capital market business. To contact and liaise between the Association and you such as reminder notification for renewal, change, correction of trader information of the trader registration, etc.	 Basic data Occupational information Information used for communication Sensitive data Basic data Occupational information Information used for 	 Public interest Express consent For legitimate interests
To disseminate information about being the Registered Trader of you on the website of the Association in order that you and related persons can check your registered tradership.	 communication Basic data Occupational information 	• For legitimate interests
To contact and liaise between the Association and you regarding activity invitations organized by the Association i.e. CSR activity, communicate training courses and seminars organized by the Association, to deliver documents, supplies, and opinion survey forms to be filled in to enable the Association to improve and develop its services to you better.	 Basic data Information used for communication Information acquired from activity participation 	• For legitimate interests

Part of Counterparts of the Association

Objectives and/or Activities	Data Category	Lawful basis used for the processing
To accept you to be a new Counterpart, to check preliminary information, and to identify your identity or your authority to act on behalf of the entity where is the Counterpart of the Association or as a party who enters into a contract with the Association	 Information used for entering into a contract with a party 	• For complying with a contract, to which the data subject is a party or to fulfill the request of the data subject before entering into such contract
To manage fee payments, debt collections, and collections and records of accounting and tax information.	 Information used for entering into a contract with a party 	For contract complianceFor legal compliance

- 4.1 For processing your personal data for a purpose that is not above specified, the Association shall provide a notification of additional personal data processing information in order to explain the use of the data according to the said purpose. You should read the said relevant privacy notices together with this Notice.
- 4.2 Since your personal data processed by the Association for the purpose specified in Clause 4.1 above on part of which relates to the legal or contractual compliances or is necessary to enter into a contract with you and your personal data is significant to achieve the said purpose, therefore, if you do not provide the said personal data to the Association, it may have legal effects or the Association may not be able to perform the duties under the contract with you or is unable to make a contract with you (as the case may be). In such case, the Association may reject to enter into a contract with you or may cancel to provide relevant services to you, whether in whole or partial.

5. Accessing and using the website of the Association

The Association uses data analysis services from third parties, namely, Google Analytics and Insights Facebook, including but not limited to the website of the Association and Insights on Facebook page of the Association.

Google Analytics uses technologies such as cookies to help analyze and improve the website visitor experience. Information created by cookies regarding your usage of the website of the Association (such as IP address, visited URL, visited date and time) shall be delivered and restored on Google's server by Google. Google shall use the said information to track and manage lists relating to the activities of the website and shall provide other services relating to the use of the website and the use of the internet. Google can transfer this information to the third party as specified by law or upon the said third party has processed the information on behalf of Google. For more information regarding the Google Analytics by using the add-on program of Google at Google Analytics Opt-out Browser add-on.

Insights Facebook for the page on Facebook can make statistics and insights for page administrators to help understand how people manage the page by using information synthesized by insights of the page which is overall statistics acquired from certain activities recorded by the server of Facebook when people interacted with each other and contents that connected to them. Those activities were from several data points, depending on the type of activities. For more information regarding insights of such Insights, please see information regarding insight of the page.

6. Using CCTV cameras

The Association has CCTV cameras in the workplace of the Association used for detecting and preventing crimes, security incidents, unauthorized access to the workplace of the Association and restricted areas, gross misconduct, supporting inspection work for security and internal affairs, supporting criminal inspection,

and inspecting security incidents as well as doing safety rehearsal and training. The processing of CCTV information for the abovementioned purpose is requisite for legitimate interests and legal compliance of the Association. The Association shall provide you an appropriate reminder that, in such area, CCTV cameras are capturing video, and the Association shall collect such information for 30 days only.

7. How to collect your personal data

The Association shall collect your personal data through the following channels:

- Information collected directly from you: It is a case in which you have provided your personal data to the Association, including but not limited to (1) you have provided your personal data to the Association through forms as well as e-forms; (2) by contacting with us via E-mails or posts; (3) by communicating with us by yourself or through phone; (4) while you came to visit our office; (5) from using the website or applications of the Association; or (6) from joining activities with the Association, etc.
- Information collected from a third party: It is a case in which the Association has received the personal data from other sources not directly from the data subject, including but not limited to (1) receiving the information from a person to notify in case of emergency or a reference for a job application; (2) the Counterpart or a service provider or a company who is the Member of the Association has delivered your personal data in order to be able to do transactions, etc. and you have certified and affirmed the accuracy of such personal data as well as have represented and warranted that you completely notified those persons of the details of this Notice.
- Information collected being public information: It is a case in which the Association has collected your personal data from sources that have already made such information available to the public, including but not limited to (1) registration information of companies, associations, and entities; (2) information of capital market licensees; and (3) other public sources including any services accessible on the internet.

8. How to use your personal data

The Association shall process your personal data to the extent permitted by law. In other words, it shall be based on a lawful basis for processing. The above contents contained in the heading "Objectives and the lawful basis for using your personal data by the Association" consists of additional details regarding the lawful basis the Association shall use for processing your personal data.

In some cases, the Association shall use your personal data for legal or contract compliances which the Association shall enter into or has entered into such contract with you as a party. Especially, the Association shall use your personal data in the following cases:

• **Contract compliance**: In the event that the Association is required to be in compliance with a contract which the Association shall enter into or has entered into such contract with you as a party or to

perform as your request before entering into the contract such as the Association's use of your name and surname, Telephone number, and address for liaising of training participation.

- Legal compliance: In the event that it is necessary for complying with the law or regulatory rules and regulations applicable to the Association such as, in order to be in accordance with the Regulation of the Association, Article 22 and Article 13 (5) of the Trade Association Act, the regulations shall state general meetings shall be called and there shall be accounting and tax management.
- Legitimate interests: In the event that it is necessary for the interests pursued by the Association (or by a third party), the rules are that it shall be a lawful act and it provides interests for you or for other people more than it interrupts your right of privacy such as to check your identification, to invite you to participate in activities organized by the Association or to invite you to attend training courses and seminars organized by the Association, etc.
- **Consent and express consent**: It shall be a case that you should give consent or express consent for processing your personal data such as to collect a criminal record for checking your qualifications before registering as a trader.
- Public interest: It shall be a case that the processing is necessary for the performance of a government mission carried out in the public interest as specified by law as well as a private organization that has been designated to exercise an official authority for the public interest under the law such as services of a qualifying examination to be registered as a trader, trader registration, supervision of member and trader in accordance with the rules and regulation stipulated by The Securities and Exchange Commission i.e. Notification of Capital Market Supervisory Board No. TorThor. 35/2556, Notification of the Office of the Securities and Exchange Commission SorThor. 14/2562 and registration for debt instrument information in accordance with Notification of the Capital Market Supervisory Board No. TorThor. 17/2561, etc.

9. Retention period of your personal data

The Association shall collect the said data for the period limited to the extent necessary to achieve the objectives of such data collection. And this shall include other cases such as collecting personal data for compliance with the laws, rules, regulations, accounting, or reporting, for compliance with the law, and for the establishment of or defense of legal claims. Upon the personal data processing is no longer necessary, the Association shall destroy, erase, or anonymize the personal data to become anonymous data that cannot identify the data subject.

In general, the Association shall collect contractual information as well as other relevant information, annexes, or supplements which form an integral part of contracts for the period of 10 years from the termination thereof for supporting the legal action if any controversy or dispute arises. The said retention period shall be in accordance with the prescription specified by law. In the event of the collection of personal data you have given consent to the Association, the Association shall retain the said data until the objectives of such collection previously notified to you no longer exist or you wish to withdraw such consent,

as the case may be. However, there may be a case that the Association collects your personal data for a period less than the said retention period.

10. Disclosure of your personal data

The Association may exchange your personal data with the following specified individuals or juristic persons in order to be in accordance with the objectives of collecting, using and/or disclosing such information, detailed in the headings of "Objectives and/or activities and the lawful basis for using your personal data" and "How to use your personal data":

- The Association shall disclose your personal data to any of the following individuals or juristic persons upon necessity or to be in accordance with the objectives notified:
 - (1) an individual or juristic person whom the Association has the duty or is requested to disclose the personal data by the competent court or by the government agency, tax authority, regulator, law enforcement agency, or similar authority.
 - (2) a counselor or a professional counselor of the Association, including attorney, auditor, accountant, and insurer who provides services of legal consulting, association, audit, or insurance, respectively, to the Association.
 - (3) a document depository service provider, information technology, and system administration service provider for the Association.
 - (4) For the safety response of persons or the public.
 - (5) The Association may disclose your personal data on social media, including but not limited to Facebook, Twitter, Instagram, YouTube, or on the website of the Association for the purpose of public relations if you have given consent to the Association

The Association may need to transfer your personal data to other recipients which is an integral part of the normal business operations of the Association such as transferring the personal data to be restored in server/cloud in many countries as the working system standard used for performing works.

In the event that the destination country has no adequate standard, the Association shall oversee such transfer of personal data to be as specified by law and shall provide suitable personal data protection measures as it thinks necessary and appropriate in correspondence to the confidentiality standard such as non-disclosure agreement should be made with the recipient in the said destination country, etc.

11. Your rights

In certain circumstances, you have the rights granted by/under the Personal Data Protection Act, B.E. 2562, any announcements, or practices issued by virtue of this Act (the "**Personal Data Protection Law**") on part of the exercise of rights in your personal data. The Association has the policy to respect your rights and the Association shall comply with the laws, rules, or regulations applicable to the processing of your personal data.

Your rights shall be as follows:

- **Right to withdraw consent** In the event that the Association processes your personal data based on the consent basis, you may withdraw such consent at any time.
- **Right of access** You have the right to request the Association to affirm that it processes your personal data or has no right of access to your personal data and the right to know details of how the Association is using your personal data.
- **Right to data portability or data transfer** You have the right to receive personal data concerning you in a format that is readable or commonly used by ways of automatic tools or equipment carried out by automated means. And you have the right to request for sending or transferring your personal data in such formats to other data controllers or to yourself unless it is impossible to do so because of technical circumstances, whereby it shall be as specified by the Personal Data Protection Law.
- **Right to object to the processing of personal data in some cases -** You have the right to object to the processing of personal data for any of the following cases:
 - The Association shall process the personal data based on legitimate interests or for exercising a mission for the public interest; or
 - (2) The Association shall use the personal data for the purpose of direct marketing; or
 - (3) The Association shall process the personal data for the purpose of scientific, historical, or statistical research.
- **Right to erasure of personal data in some cases** You have the right to request some data that the Association collects to be eased. However, the said right shall not cover erasing all the data. The Association shall consider your request thereof only if:
 - (1) your personal data is no longer necessary to be collected in accordance with the specified objectives of processing your personal data.
 - (2) you have withdrawn the consent which is the basis for collecting and processing the personal data. Therefore, the Association has the legal authority to collect or process the said personal data no more.
 - (3) you have objected to the processing.
 - (4) such collection or processing of your personal data is unlawful.
- Right to restrict processing of personal data in some cases You have the right to restrict the processing of your personal data in certain circumstances. In this case, the said right shall arise only if you have objected to the accuracy of your personal data, if you have objected to the processing, if such processing of your personal data is not in accordance with the law which shall be erased or destroyed but, instead, you request to restrict the processing, if the Association is no longer necessary to collect your personal data but you request the Association to retain your personal data for the purpose of establishment, exercise, defense of legal claims, or if the Association is required to use your personal data for inspection as your request for objecting the processing.

- **Right to rectification on inaccurate personal data** You have the right to request the Association to rectify inaccurate or incomplete personal data. If the Association has a reasonable cause to not do so as your request, you have the right to request the Association to record your request in the record of the Association on the processing operation; and
- **Right to lodge a complaint** You have the right to file a complaint if you are of opinion that the Association or the staff or the data processor of the Association violates or does not comply with the Personal Data Protection Act, B.E. 2562, or notifications issued in accordance with this Act.

At any time, you may exercise any of your rights by directing the contact information of the Association specified in this clause. You shall not pay the fee for access to your personal data (or exercise any of your rights). However, you may be charged fees, as the case may be, if it is found that your request has no ground, is repetitious, or extravagant. Moreover, the Association may reject your request if it falls within the said case.

The Association may require requesting some information from you to enable the Association to identify you and to exercise your right to access your personal data (or exercise any of your rights). Nevertheless, it is a security measure to prevent your personal data from being disclosed to any person who has no right to receive such data. The Association may contact you to enquire about additional information on your request in order that the Association can dramatically respond to your request.

The Association puts its effort to respond all lawful applications within 30 days. However, in some cases, it may take time more than 30 days if your application is complicated, or you have submitted several applications. In such case, the Association shall inform you thereof and keep you updated on the progress of the said case.

Should you wish to apply to exercise the said right, you can write an application therefor according to the form specified by the Association by downloading the application form for exercising the right on the website of the Association.

12. Contacting the Association

Should you have any queries regarding this Notice as well as any application for your rights, please contact the following contacting information:

Association & Member Development Department

Thai Bond Market Association is located at 900 Tonson Tower, Ploenchit Road, Lumpini, Pathumwan, Bangkok 10330 Thailand. E-mail: corporateplanning@thaibma.or.th, Tel. 02-257-0357 ext. 400-406.

13. Amendment

This first Notice was made in January 2021 and the last amendment was made as shown in the "Revision Date" as appeared herein.

This Notice may be amended by the Association from time to time and shall be posted on the website of the Association for 30 days. Should you use the services of the Association after elapsing the said time, it shall be deemed that you have acknowledged and agreed to this Notice and any amendments thereto.

Remarks: This Notice has been informed in advance in order to become effective from 4 June 2021 onwards. If the Personal Data Protection Act, B.E. 2562 is postponed its effect, the effect of this Privacy Notice shall be deemed postponed becoming effective on the same date as the personal data protection under the Personal Data Protection Act, B.E. 2562 becomes effective as well.