

## CUSTOMER PRIVACY POLICY

Dated as of 1 February 2023

SuperRich Turtle Exchange Company Limited (the “**Company**”) truly recognizes the importance of the protection of the personal data of its past and current customers who use the Company’s products and/or services. The Company strives towards the full compliance with the applicable data protection laws which determine rules, mechanisms, and measures regarding the protection of the personal data for operators to whom the personal data is collected, used or disclosed. To support the compliance of such data protection laws, the Company has established this policy.

### 1. WHAT PERSONAL DATA THE COMPANY COLLECTS, USES AND/OR DISCLOSES

Subject to the terms and conditions under this policy, the Company collects your personal data which can be categorized into following types:

Type	Example of the personal data
Personal information	title, name (front name and middle name), surname, gender, nationality, occupation, and signature
Contact information	postal address, national identification card address, phone number, and email address
Individual identity verification information	picture, photocopy of identification card, photocopy of passport, identification number (including laser identification) and passport number
Transaction information	currency exchange transaction data, products and services purchase data, payment information, and information in the transaction documents
Security information	stills or motion pictures recorded through CCTVs (the Company shall install indication signs at the CCTVs monitored areas so that you are notified that there are CCTVs installed)
Sensitive data	sensitive data in individual identity verification documents (e.g., religion), and biometric data (e.g., face recognition, fingerprint recognition, iris recognition, and voice identity)

The Company would like to inform you that the Company does not have any intention to collect any sensitive data in individual identity verification documents (e.g., religion). As such, you may redact those sensitive data prior to submitting your documents to the Company. In case you did not redact those sensitive data contained in your documents, the Company reserves its right to redact such sensitive data of yours. In such case, it shall be deemed that the Company has not collected any of the said sensitive data.

### 2. PURPOSES OF COLLECTION, USE AND/OR DISCLOSURE OF PERSONAL DATA

The Company collects, uses and/or discloses your personal data only in necessary case, for the purposes based on legal grounds (i.e., contractual basis, legal compliance, legitimate interest, vital interest for preventing or suppressing a danger to a person’s life, body or health, and/or public interest), for the purposes based on consent, or any other grounds permitted by the data protection laws (as the case may be).

## 2.1 Purposes based on legal grounds

- 1) Contractual basis, such as, to offer and render the currency exchange services, to offer and deliver any other products or services of the Company, to verify individual identity for any transaction, to proceed with your request, to record your transaction, and to exercise legal rights or to enforce the Company's agreement
- 2) Legal compliance, such as, to know you, to conduct customer due diligence, to assess money laundering risk, to use as transaction evidence, to provide transaction report to the government agencies, to comply with the laws relating to the Company's businesses (e.g., the exchange control laws, the anti-money laundering laws, and the counter terrorism and proliferation of weapon of mass destruction financing laws), and to comply with the order of the courts or competent regulators (e.g., the Bank of Thailand and the Anti-Money Laundering Office)
- 3) Legitimate interest, such as, to manage the Company's business operations (e.g., governance and compliance, risk management, internal audit, treasury, and preparation and audit of financial reports), to manage customer relationship (e.g., customers' needs and satisfaction assessment, and complaint management), to improve and develop the Company's products and services (e.g., analysis, evaluation, and provision of the Company's internal report, public relation strategic planning), to keep the safety and to protect the Company's office and assets from any damage and crime, and to transfer in case of business transfer or merger
- 4) Vital interest for preventing or suppressing a danger to a person's life, body or health, such as, to protect your life, body and assets during doing transaction at the Company's office

## 2.2 Purposes of which we rely on consent

- 1) Biometric data, for identity verification as required by laws, including but not limited to anti-money laundering laws
- 2) General personal data, for contact and communication, and for delivery of news, business information, and privilege (including, gifts), and for activity invitation

## 3. SOURCES OF YOUR PERSONAL DATA

Generally, the Company directly collects your personal data from you. However, the Company may obtain your personal data from other sources, such as, business partners and/or service providers whom the Company has relationship with, government agencies (e.g., the Department of Provincial Administration, the Ministry of Interior (DOPA Dip Chip), the Bank of Thailand, (NDID System), Thai Association of Foreign Exchange and Money Services, and social media). The Company shall proceed the collection, use and/or disclosure of personal data, whether from any source, in accordance with the data protection laws and this policy.

## 4. TO WHOM THE COMPANY MAY DISCLOSE PERSONAL DATA

Subject to the applicable data protection laws and this privacy policy, the Company may disclose your personal data to the following third parties.

- 4.1 Suppliers and business partners (e.g., currency exchange operators, commercial banks, and authorized persons to engage in business relating to foreign means of payment)

- 4.2 Service providers (e.g., providers of data for assessment of risk relating to money laundering, terrorism and proliferation of weapon of mass destruction financing, or any other actions in order to reduce the Company's risks in doing transaction with wrongdoing person, payment service providers, software developers, IT service providers, and website service providers)
- 4.3 Government agencies and/or regulators (e.g., the Bank of Thailand, the Anti-Money Laundering Office, and the Revenue Department)
- 4.4 Professional advisors engaged by the Company (e.g., financial advisors, legal advisors, and auditors)
- 4.5 Assignee of rights and/or obligations in case of business rehabilitation, business merger, partial or entire business transfer, business acquisition, joint venture, transfer of rights, business transfer, assets transfer, share transfer, or any other event of the same nature

## **5. HOW LONG PERSONAL DATA ARE KEPT**

The Company retains your personal data for as long as is reasonably necessary to fulfill purposes for which the Company obtained them. However, in any case, the retention period shall not longer than the period specified by laws or the statute of limitations for civil cases (10 years), except for the security information, for which the Company will retain them for no longer than 30 days from recording date.

## **6. CROSS-BORDER TRANSFER OF PERSONAL DATA**

- The Company does not have a policy regarding cross-boarder transfer of your personal data except in cases of transfer to the affiliates, branches, or suppliers who have to jointly provide services to the customers, or to fulfill your request as a data subject.
- If the Company needs to send or disclose your personal data as mentioned above, the Company shall send or transfer them to third parties located overseas only if the destination countries have sufficient data protection standards required by laws.

## **7. YOUR RIGHTS AS DATA SUBJECT**

Subject to the applicable laws, you as a data subject may have the following rights:

- Right to withdraw consent

You may withdraw your consent at any time for the purpose of which you provided consent to the Company unless there is any legal restriction or agreement that benefits you. However, consent withdrawal shall not affect the lawfulness of the collection, use and/or disclosure of your personal data from your consent prior to consent withdrawal.

If you exercise your right to withdraw consent as specified in preceding paragraph, you may not be contacted, communicated with, receive the Company's business information and privilege (including, gifts), and be invited to activity. The Company may be unable to proceed with your request, resulting in inconvenience to you.

- Right to access and request a copy of your personal data

You have the right to access or request a copy of your personal data held by the Company, and the right to know the source of your personal data that does not rely on your consent. The Company will reject your request if it is prohibited by law or a court order, or if proceeding with your request may cause damage to other person's rights and freedoms.

- Right to obtain and transmit your personal data

You have the right to obtain your personal data collected by the Company in a structured, commonly used, and machine-readable format through automated tool or device. You also have the right to request that the Company transmit such personal data to another data controller where technically doable, or to obtain your personal data that the Company directly transmits to other data controller, unless it is technically undoable. The Company will reject your request if there are legitimate reasons to do so.

To exercise the right hereunder, you must explicitly consent to request the Company to send or transfer your personal data to another data controller.

- Right to object the collection, use and/or transfer of your personal data

You have the right to object the collection, use and/or transfer of your personal data in the event that the processing of personal data is based on legitimate interest, or for direct marketing purpose, or for science/historical research or statistics. The Company will reject your request if there are legitimate reasons to do so.

- Right to request for deletion or destruction of your personal data

You have the right to request for the deletion, destruction or anonymization of your personal data if: (a) such personal data is no longer necessary to be kept for the purposes for which it was collected; or (b) you withdraw your consent and the Company does not have any legal ground to continue the collection, use and/or disclosure of your personal data; or (c) you exercise your right to object to the collection, use and/or disclosure of your personal data and the Company is unable to reject your objection request; or (d) if the personal data was collected, used or disclosed unlawfully. The Company will reject your request if there are legitimate reasons to do so.

- Right to restrict the use of your personal data

You have the right to restrict the use of your personal data if: (a) the Company is in the process of verifying a rectification of your personal data; or (b) such personal data is required to be deleted or destructed due to unlawful collection, use and/or disclosure, (c) such personal data is no longer necessary to be kept for the purposes for which it was collected, but you require it to establish a legal claim, exercise legal rights, or raise it as a defense; or (d) the Company is in the process of verifying an objection to the collection, use and/or transfer of your personal data.

- Right to rectify your personal data

You have the right to request the Company to rectify your personal data to be up to date, complete and not misunderstand.

- Right to lodge a complaint

You have the right to lodge a complaint to the competent authority if you believe our processing of your personal data is unlawful or non-compliance with applicable data protection laws.

## 8. EXERCISE CHANNEL AND PROCESS DURATION

You can exercise your rights as data subject at the Company's head office or branches.

<b>Rights of data subject</b>	<b>Process duration</b>
Right to withdraw consent	7 days
Right to access and request a copy of your personal data	30 days
Right to obtain and transmit your personal data	
Right to object the collection, use and/or transfer of your personal data	
Right to request for deletion or destruction of your personal data	
Right to restrict the use of your personal data	
Right to rectify your personal data	
Right to lodge a complaint	

## 9. HOW PERSONAL DATA ARE PROTECTED

The Company shall keep your personal data safely. It has appropriate security measures and data fraud protection measures in place. The Company has policies and procedures, such as prohibiting its employees from taking customer personal data out of the Company's system, implementing electronic data security system measures, strictly defining the terms and conditions regarding the protection of personal data in agreement the counterparty, as we as setting confidentiality obligation in the employees' regulations.

## 10. CONTACT DETAIL

If you have any inquiry about this policy and the Company's personal data protection, or wish to exercise your rights relating to your personal data as data subject, please contact the Company at:

Data Protection Officer  
 SuperRich Turtle Exchange Company Limited  
 BTS Asoke station Unit E4-1, Sukhumvit road,  
 Klong Tan, Klong Toei, Bangkok  
 Email: dpo@superrichturtle.co.th

## 11. CHANGE IN PRIVACY POLICY

The Company may change or amend this policy from time to time. The Company will post the date that the policy was last updated at the top of the policy.