Privacy Policy

Business Online Public Company Limited

Business Online Public Company Limited (the "**Company**") is a leading Thai provider of business information and analytics tools providing comprehensive information services through the Company's products and/or services (the "**Products**") that assist customers or users (the "**Customers**") in making effective business decisions.

The Company provides solutions that meet a diverse set of global customer needs. The Customers may use the Products to mitigate credit risk, increase cash flow, drive increased profitability, and more effectively manage their suppliers and service providers, including strengthening their marketing initiatives and increasing revenue from new and existing customers.

The Company's database contains business records in which some information may be classified as personal information under various laws such as information relating to an individual (e.g., director and authorized director of a company, a beneficial owner, a shareholder, a professional contact, etc.).

It is the Company's responsibility to safeguard the information within its care and the Company is committed to managing its data in a secure and responsible manner. The Company makes the Products based on business information gathered from government databases and credible sources.

This Privacy Policy (the "**Policy**") explains how the Company collects, uses, manages, shares, and protects information of juristic persons and individuals. Please read this Policy carefully to understand the information collection and management practices of the Company. The Company seeks to adhere to this Policy and principles through ongoing compliance, documentation, and assessment to ensure compliance with the personal data protection regulations.

This Policy describes the Company's practices for the management of information that are available on www.bol.co.th. This site may provide links to other websites that may employ different information management policies. The Company encourages the Customers to carefully read the privacy policy of other websites to ensure that the Customers understand their practices and the relevant distinctions.

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Section 1. Definitions

No.	Terms	Descriptions
1.	Processing	Collection, use or disclosure of Personal Data.
2.	Data	Business Information and Personal Data
3.	Business Information	Information relating to business operation, incorporation, changes, or any other relevant operation of juristic persons and natural persons in many areas of business.
4.	Personal Data	Any information relating to a Person which enables the identification of such Person, whether directly or indirectly, such as name, surname, nickname, address, telephone number, identification number, passport number, bank account number, credit card number, email address, Cookies, IP address, cookie IDs and log files, etc. This does not include the information of deceased Persons.
5.	Sensitive Personal Data	Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical belief, sexual orientation, criminal records, health data, disability, labour union data, genetic data, biometric data or any other data which affects the Data Subject in the same manner as prescribed by the Personal Data Protection Committee.
6.	Cookies	Small text files that are stored on a computer or device to store information and settings on the computer and device upon visits to websites and/or applications. The Data Subject may set its privacy to disable or suspend the use of Cookies, whether in whole or in part. However, disabling or suspending the use of Cookies may result in the Company's being unable to render complete and efficient services to the Data Subject, which may result in slower access and use of some functions or less convenience.
7.	Data Subject	Any Person who is a data subject, but not including a Person having ownership of, or creating or colleting, such

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No.	Terms	Descriptions
		data. Data Subject shall mean a natural person only, and not include a juristic person.
8.	Personal Data Protection Officer	Any Person or the Company's Personal Data protection unit or service provider who has obligations relating to the Personal Data protection of the Company.
9.	Policy	This Privacy Policy, which may be amended or supplemented from time to time.
10.	Person	Natural person.
11.	Company	Business Online Public Company Limited
12.	Products	Products and/or services of the Company.
13.	Data Controller	A Person or juristic person having the power and duties to make decisions regarding the collection, use or disclosure of Personal Data.
14.	Data Processor	A Person or juristic person operating in connection with the collection, use or disclosure of Personal Data pursuant to the order given by or on behalf of the data controller, provided, that such Person or juristic person is not the data controller.
15.	Customers	Customers or users of the Company's Products.

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Section 2. Information Collected by the Company

2.1 Business Information

The Company collects information on businesses and business professionals. This includes information that the Company collects from businesses' owners, creditors, suppliers, third parties and suppliers, and from public records such as business registrations, the Stock Exchange of Thailand filings and bankruptcy filings. The Company publishes processed information on businesses that is available in public sources and may be a factor in the Customers' decision making involving credit, insurance, marketing and other activities. The information that the Company collects includes, but is not limited to, the following:

(1) Company and business professional information, including business contact information such as name, title, address, phone number, fax number, e-mail address, domain names, and registration, financial and tax records;

(2) Detailed company profiles and statistics, including number of employees;

(3) Background information regarding company management, such as beneficial ownership or persons of significant control, the educational and career histories of company principals, legal history or status, including but not limited to any history of criminal acts or misconduct;

(4) Company operational histories, including territories, subsidiaries, affiliates, and lines of business;

(5) Detailed trade and business credit information, including payment histories and patterns;

(6) Summary of Business Information regarding profitability, debts, assets, net worth, and business relationships;

(7) Business compliance information from public sources, government and professional records, media and business publications;

(8) Educational institutional profiles and statistics, including educational subject matter specialties and number of employees;

(9) IP addresses, geolocation, and comments on social media;

(10) Credit and debit card information in order to process certain customer payments; and

(11) Personal Data relating to businesses of a Person in such businesses.

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2.2 Personal Data

The Company may collect Personal Data as follows:

(1) **Data relating to Person** such as name, surname, age, date of birth, gender, nationality, marital status, identification number, passport number, address, place of work, telephone number, email address, information on a name card, status of being a director, board of directors of a company, authorized director, shareholder, agent and/or attorney of a company, investor, status of being a distributor, service provider or supplier of the Company, sound, image, motion picture and social media handle;

(2) **Financial data** such as bank account numbers and financial transactions;

(3) **Data relating to products and services** such as data relating to products or services that the Data Subject is interested in, or that the Data Subject has used, satisfaction, feedback and comments of the Data Subject on such products or services, and details about exercising rights and complaints about products and services;

(4) **Data collected automatically through computer tracking** such as Cookies, IP address, type of devices, browsers or operating system (e.g., Android or iOS), areas of the website visited and the websites from which the Data Subject came, history of visits, searches, and activities on the websites and applications of the Company, which are gathered from Cookies, pixel tags, and other tracking technologies;

(5) **Location data** such as precise location, including geographic location of a mobile device or computer, and location-based services;

(6) **Sensitive Personal Data** such as religion and ethnic origin; and

(7) **Personal Data of a third party that the Data Subject has provided to the Company** such as name, surname, address, telephone number, relationship, occupation, status of being a senior management, authorized person, attorney of a company, director, shareholder, employee, worker, owner or co-owner, and other Personal Data of any Person.

2.3 Sensitive Personal Data

The Company may collect the Sensitive Personal Data of the Data Subject, such as ethnic origin and religion, for performance of a contract with the Data Subject or when the Data Subject gives consent to provide such data to the Company. The Company will only use this data for limited purposes and for the purposes for which the Sensitive Personal Data is collected. The Company will take reasonable steps as required by applicable laws to

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adequately secure such data. The Company may also share this data with credible third parties for limited and permissible purposes.

2.4 In the event that the Data Subject is a minor, incompetent Person or quasi-incompetent Person, the Company will comply with the laws regarding Personal Data protection in relation to Processing of such Personal Data by using the utmost care to protect such Personal Data.

Section 3. Sources of Data

The Company will collect Business Information and Personal Data of the Data Subject from the following sources:

(1) information collected directly from a business owner or from the Data Subject by the Company through application for use of the Company's products, contacting the Company, its employees and/or its representatives, websites, applications, platforms, social medias, survey responses or other promotional and marketing channels of the Company, including attending meetings and participating in activities of the Company, etc.; and

(2) information collected from other sources, such as the Department of Business Development, the Ministry of Commerce, the Stock Exchange of Thailand, the Securities and Exchange Commission, the Bank of Thailand, courts, the Revenue Department, the Legal Execution Department or other government agencies, affiliates, business partners, data providers, platforms or social media, third-party websites, or by interviewing a third party having a legitimate right to process Personal Data of the Data Subject and/or the Data Subject's suppliers, other public sources, etc. If the Company collects the information from other sources, the Company will process the information within the scope prescribed by the laws regarding Personal Data protection and other laws.

Section 4. Purpose of Processing Personal Data

4.1 The Company will process Personal Data as necessary for the legitimate purposes that were notified to the Data Subject prior to or at the time of collection of such Personal Data, when the Data Subject has given consent to the Company prior to or at the time of Processing of Personal Data, or when the Company can process the Personal Data without the Data Subject's consent as permitted by law.

4.2 The Company's Processing of Personal Data shall be for one or more of the following purposes:

(1) for the legitimate interests pursued by the Company or other Person or juristic person, except where such interests are overridden by the fundamental rights relating to Personal Data of the Data Subject. For instance, the Personal Data is an integral component of the Business Information that the Data Subject or any representative of a company has notified to the Department of Business

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Development, or the Personal Data is an important element of government announcements or is announced in the Government Gazette, etc.;

(2) to provide services and facilitate usage of services on the websites and/or via the applications of the Company by the Customers, the Data Subject or users of the Personal Data;

(3) to verify qualification for registration, attendance at shareholders' meetings, attendance at board of directors' meetings, participation in the Company's activities, any communication or cooperation with the Company, membership application and creating a username, including keeping and managing such username;

(4) to enter into a contract and perform a contract or obligations between the Data Subject, as a user or receiver of services, and the Company, or to take steps at any request of the Data Subject prior to entering into such contract. In this case, if the Data Subject does not provide its Personal Data to the Company, the Company may not be able to effectively comply with any commitments to the Data Subject;

(5) to analyze behavior of Persons; conduct research, marketing research, and promotional activities; create advertising; provide offers, privileges, news, public relations, promotions; and to introduce products and services of the Company, its affiliates and business partners that may be of interest to Persons, fulfill their needs and/or be appropriate for such Persons;

(6) to improve and develop the Company's products and services, and resolve problems or difficulties arising from the Company's products and services by conducting evaluations, market research, analysis, modeling, or preparing an overview report, etc.;

(7) to provide after-sales service, such as contacting the Data Subject to ask about its satisfaction and further feedback regarding the Company's products and services provided to the Data Subject;

(8) to manage, track and monitor the operation of the websites and applications of the Company in order to facilitate the use of websites and applications, improve content and improve the efficiency and security of the websites and applications provided by the Company;

(9) to monitor any behavior, activities, and actions on websites or applications of the Company in order to ensure computer security and prevent any unlawful activities, such as fraud or crimes;

(10) to comply with relevant laws, regulations, rules, or guidelines, including orders of courts or government organizations with which the Company is obligated to comply, or in other cases as stipulated by laws;

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(11) for security and legitimate interests of the Company, such as collecting and Processing of Personal Data by various means, e.g., recording images, motion picture, and/or voice by using CCTV cameras to safeguard a location, property, employees, and visitors; and

(12) for legitimate interests of the Company in other cases, such as recording telephone conversations during contact with the Company, images, motion picture and/or voice, and collecting a copy of the identification card of a Person attending meetings and activities, such as training, seminars, recreation or other activities of the Company, collecting a copy of the identification card of a Person for identification for use as a supporting document in case of exercising the rights of the Data Subject, receiving and delivering documents, parcels, gifts, or dealing with complaints, disputes and claims, etc.

Section 5. Use and Disclosure of Personal Data

The Company will use and disclose Personal Data only for the purposes specified in its policies. The Company may disclose any Personal Data as necessary and only to the following Persons and entities:

(1) employees and contractors who require access to Personal Data in order to provide services, operate businesses, and perform the Company's obligations under a contract between the Data Subject and the Company, and to comply with the commitments to the Data Subject;

(2) service providers who process Personal Data on behalf of the Company, or support or assist in the Company's business operations, both in Thailand and overseas;

(3) affiliates, agencies, suppliers, or business partners, both in Thailand and overseas, to whom the Data Subject consents, or in other cases permitted by laws;

(4) customers or service users of the Company, both in Thailand and overseas, who can lawfully have access to Personal Data, in the event that the Personal Data is an integral component of Business Information, or that the Data Subject has given consent to the Company, or in other cases permitted by laws;

(5) auditors, lawyers and consultants of the Company;

(6) competent courts, government agencies or other legal entities such as the Revenue Department, the Anti-Money Laundering Office and the Office of the National Anti-Corruption Commission; and

(7) third parties to whom the Data Subject has asked the Company to disclose such data.

In disclosing the Personal Data to such recipients, the Company will procure that the recipients shall acknowledge and protect such Personal Data in accordance with the purposes of the

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Company to process the Personal Data and shall not use such information for any purposes other than the purposes specified by the Company.

Section 6. Disclosure or Transmission of Personal Data to Persons Abroad

The Company's main business relates to Processing of Business Information, and occasionally it discloses or transfers data to foreign recipients. Any Personal Data, which is an integral component of Business Information that the Data Subject or any representative of a company has notified to the Department of Business Development, or any Personal Data collected by the Company, may be disclosed or transferred to the foreign recipient who is in the same affiliated business, or same group of undertakings for the purpose of performance of a contract between the Company and a recipient, or storage of data on behalf of the Company. For instance, transmitting or transferring Personal Data to a cloud service provider having a platform or server situated outside of Thailand. In this regard, the Company will comply with the regulations regarding the protection of Personal Data prescribed by the Personal Data Protection Committee and procure appropriate protection measures, which enable enforcement of the Data Subject's rights, as well as effective legal remedial measures.

Section 7. Key Legal Bases for Processing of Information

7.1 Consent

The Data Subject may give consent to the Company for collection, use, management, retention, and disclosure of its Personal Data prior to or at the time of Processing data by the Company in accordance with applicable laws, or the Data Subject may be deemed to have given consent under the applicable laws for Processing of data as described in this Policy, privacy notice and other relevant terms and conditions.

7.2 Legitimate Interest

The Company processes Personal Data for the legitimate interests pursued by the Company or other persons, including to: (i) manage their business opportunities, business credit and financial risks; (ii) make risk management, and marketing decisions; (iii) carry out transactions; (iv) protect against fraud and dishonesty; and (v) know who they are doing business with, without prejudice to the Data Subject's interests or fundamental rights.

7.3 Contracts with the Data Subject or Related Parties

The Company processes information to perform its obligations under any contract with the Data Subject or other related persons, or to comply with a request of the Data Subject or other related persons prior to entering into a contract.

It is within the Data Subject's sole discretion to provide Personal Data to us. If the Data Subject does not provide the Company with any data as requested, the Company may not be able to comply with the request of the Data Subject, enter into a contract with the Data Subject or other related persons.

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7.4 Legal Obligations of the Company

The Company processes information as needed to comply with legal obligations under relevant laws and regulations.

Section 8. Retention Period for Personal Data

The Company will retain the Personal Data as long as it is necessary and appropriate for the purposes of operating such Personal Data, unless there is a law stipulating a specific retention period. Upon the lapse of such retention period, the Company will delete, destroy, or anonymize the Personal Data. However, the Company may continue to collect, use or disclose the Personal Data as necessary to the extent permitted by laws.

Section 9. The Rights of the Data Subject

9.1 When the Personal Data Protection Act B.E. 2562 (2019) comes into effect with respect to the Company, the Data Subject has the following rights to manage its Personal Data which is under the supervision of the Company.

(1) Right to withdraw consent to Processing of Personal Data.

The Data Subject has the right to withdraw its consent for the Company to process the Data Subject's Personal Data that the Data Subject has provided to the Company at any time while its Personal Data is under the Company's supervision. Withdrawal of consent will not affect the collection, use, or disclosure of Personal Data for which the Data Subject has lawfully provided its consent.

(2) Right to access and receive a copy of Personal Data, and right to request the disclosure of Personal Data collected.

The Data Subject has the right to access its Personal Data and to request the Company to provide the Data Subject with copies of such Personal Data, including requesting the Company to disclose the acquisition of the Personal Data collected without its consent.

(3) Right to obtain Personal Data in a readable or commonly used format, including the right to (a) request the Company to transmit or transfer the Personal Data to other data controllers, if it can be done by automated means; or (b) request to obtain the Personal Data that the Company has directly transmitted or transferred to another data controller, unless it is impossible to be done due to technical circumstances.

(4) Right to object to the Processing of Personal Data.

The Data Subject has the right to object to the collection, use or disclosure of its Personal Data at any time.

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(5) Right to delete, destroy, or anonymize Personal Data.

The Data Subject has the right to request the Company to delete, destroy, or anonymize its Personal Data to become the anonymous data in the event that the Personal Data is no longer necessary for its purpose, or that the Data Subject has withdrawn its consent to collect, use, or disclose such Personal Data, or that the Company has no lawful basis to collect, use, or disclose such Personal Data.

(6) Right to restrict the Processing of Personal Data.

The Data Subject has the right to restrict the Processing of its Personal Data when the Company is undertaking an examination process in accordance with its request, or in other cases stipulated by laws.

(7) Right to rectify Personal Data to be accurate, up-to-date, complete, and not misleading.

The Data Subject has the right to request the Company to rectify its inaccurate or incomplete Personal Data.

(8) Right to lodge a complaint with a supervisory authority in the event that the Company or its employees or contractors have violated or failed to comply with the laws regarding Personal Data protection.

9.2 If the Data Subject wishes to exercise any of the above-mentioned rights, the Data Subject shall comply with procedures and policies stipulated by the Company. In such case, the Company may contact the Data Subject for further information regarding the request form and the Company will use its best effort to respond to the Data Subject's request within 30 (thirty) days or more than 30 (thirty) days in case of complicated requests. Exercise of such right may be subject to reasonable charges or fees for Processing such request at the discretion of the Company. However, in some cases, the Company may refuse to process the Data Subject's request to the extent permitted by law, whereupon the Company will notify the Data Subject of the reason for such refusal.

Section 10. <u>Personal Data Security</u>

10.1 The Company will provide appropriate security measures for Personal Data in accordance with the information security management system standard, i.e., ISO/IEC 27001:2013, which is an internationally recognized information security measure, to prevent unauthorized or unlawful loss, access, use, alteration, correction or disclosure of Personal Data.

10.2 All employees of the Company are required to complete training relating to Personal Data protection and security. In this regard, the Company will review and improve the measures where necessary to ensure that the Processing of Personal Data is in compliance with relevant standards and regulations.

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10.3 Policies and procedures for securely managing information and protecting data against unauthorized access implemented by the Company are as follows:

(1) Establishing explicit standards, guidelines and procedures for Personal Data protection;

(2) Limiting the right of access to Personal Data of the Company's employees;

(3) Protecting against unauthorized access to Personal Data by using data encryption, authentication, or virus detection technology, as required;

(4) Requiring partners with whom the Company engages in business to strictly comply with confidentiality obligations and relevant requirements under the laws and regulations regarding Personal Data protection, including stipulating limitation on use of personal information in a contract between the Company and each partner; and

(5) Regularly assessing the Company's Personal Data protection, information management and information security.

Section 11. Contact Information of the Company

If the Customers have any inquiries, questions, or issues regarding the Policy, the Customers may contact the Company according to the details below:

Business Online Public Company Limited

Personal Data Protection Officer

To:	Personal Data Protection Officer
Address:	No. 1023 MS Siam Tower, 28th Floor, Rama 3 Road, Chong Nonsi Sub-district, Yannawa District, Bangkok 10120
E-mail Address:	dpo@bol.co.th
Telephone number:	02-657-3999 ext. 3

Customer Service Center

Address:	No. 1023 MS Siam Tower, 28th Floor, Rama 3 Road, Chong Nonsi Sub-district, Yannawa District, Bangkok 10120
E-mail Address:	bolservice@bol.co.th
Telephone number:	02-657-3999 ext. 3

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Section 12. Amendment of the Policy

The Company has a policy to always develop and review security measures for Personal Data in order to ensure effective protection of Personal Data and compliance with good governance and relevant laws. The Company may change or amend the Policy at least once a year or when the relevant laws have a material change, and will announce the amended Policy on the Company's websites and/or other channels as the Company deems appropriate. As a result, the Company would like to recommend that the Data Subject read the Policy whenever there is an update, change, or amendment.

If there is any discrepancy between the Thai version and the English version of this Policy, the Thai version shall prevail.

Effective Date

Effective date of this Policy: 4 January 2024

This Policy was recently amended on: 13 December 2023

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