



Privacy Notice

Business Online Public Company Limited

Business Online Public Company Limited (the “**Company**”) is a provider of business information for business decision-making that comprehensively covers both business opportunities and risks. The Company regularly develops and updates its current database and introduces new technologies to analyze, process and present data in various dimensions for the best advantage of customers, members and users of business information and services of the Company.

The Company emphasizes the importance of personal data under the Company’s supervision and aims to protect privacy and security of your personal data to reassure you of the Company’s transparency in collecting, using, and disclosing your personal data in compliance with the Personal Data Protection Act B.E. 2562 (2019) and the Company’s data management and processing standards.

As a result, the Company has prepared this Privacy Notice (the “**Notice**”) to inform you of the details of collection, use and disclosure of your personal data. The key terms are as follows:

Section 1. Definitions

No.	Terms	Descriptions
1.	Processing	Collection, use or disclosure of Personal Data.
2.	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.
3.	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.
4.	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. You may set your privacy to disable or suspend the use of Cookies, whether in whole or in part.



Privacy Notice
Business Online Public Company Limited

No.	Terms	Descriptions
		However, disabling or suspending the use of Cookies may result in the Company's being unable to render complete and efficient services to you, which may result in slower access and use of some functions or less convenience.
5.	Data Subject	Any Person who is a data subject, but not including a Person having ownership of, or creating or collecting, such data. Data Subject shall mean a natural person only, and not include a juristic person.
6.	Notice	This Privacy Notice, which may be amended or supplemented from time to time.
7.	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.
8.	Person	Natural person.
9.	Company	Business Online Public Company Limited
10.	Data Controller	A Person or juristic person having the power and duties to make decisions regarding the collection, use or disclosure of Personal Data.
11.	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.



Privacy Notice

Business Online Public Company Limited

Section 2. Personal Data Collected by the Company

2.1 The Company collects your 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, investor, agent and/or attorney of a company, 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 you are interested in, or have used such products or services, your satisfaction, feedback and comments 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 you came, history of your 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 you have provided to the Company** such as name, surname, address, telephone number, relationship with you, 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 as to which you warrant to the Company that you have obtained consent from such Person to disclose such data to the Company, including consent to the Company to process his/her Personal Data for the purposes informed by the Company.

2.2 Sensitive Personal Data

The Company may collect your Sensitive Personal Data for performance of a contract with you or when you 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



Privacy Notice

Business Online Public Company Limited

applicable laws to adequately secure such Data. The Company may also disclose this Data to credible third parties for limited and permissible purposes.

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

Section 3. Sources of Personal Data

The Company collects your Personal Data from the following sources:

- (1) Personal Data collected directly from you 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) Personal Data 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 your Personal Data and/or your partners, other public sources, etc. If the Company collects the Personal Data from other sources to display such Personal Data for a legitimate interest of a Data Subject, the Company will process the Personal Data within the scope prescribed by the laws regarding Personal Data protection.

Section 4. Purposes of Processing of Personal Data

- 4.1 The Company will process Personal Data as necessary for the legitimate purposes that were notified to you prior to or at the time of collection of such Personal Data, when you have 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 your consent as permitted by law.
- 4.2 The Company will collect, use and/or disclose your Personal Data as necessary and appropriate for one or more of the following purposes (as the case may be):
 - (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 your Personal Data. For instance, your Personal Data is an integral component of the business information that you or any representative of a company has notified to the Department of Business Development, or your



Privacy Notice

Business Online Public Company Limited

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

- (2) to provide services and facilitate your usage of services on the websites and/or via the applications of the Company;
- (3) to verify your 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 your username, including keeping and managing your username;
- (4) to enter into a contract and perform a contract or obligations between you, as a user or receiver of services, and the Company, or to take steps at your request prior to entering into such contract. In this case, if you do not provide your Personal Data to the Company, the Company may not be able to effectively comply with any commitments to you;
- (5) to analyze your behavior; 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 you; fulfill your needs and/or as appropriate for you;
- (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 you to ask about your satisfaction and further feedback regarding the Company's products and services provided to you;
- (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;



Privacy Notice

Business Online Public Company Limited

- (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. Consequences of Failure to Provide the Personal Data

In the event that a Data Subject does not provide the Company with the Personal Data, such failure may cause inconvenience for the Data Subject, or cause inability to perform a contract, or affect compliance with any laws by the Data Subject or the Company.

Section 6. Use and Disclosure of Personal Data

The Company will use and disclose Personal Data only for the purposes specified in this Notice. The Company may disclose your 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 you and the Company, and to comply with the commitments to you;
- (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 you consent, 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 your Personal Data is an integral component of business information, or that you have 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



Privacy Notice

Business Online Public Company Limited

(7) third parties to whom you have asked the Company to disclose such data.

In disclosing your Personal Data to such recipients, the Company will procure that the recipients shall acknowledge and protect your Personal Data in accordance with the purposes of the Company to process the Personal Data and shall not use such information for any purposes other than the purposes specified by the Company.

Section 7. Disclosure or Transfer of Personal Data to Foreign Recipients

The Company's main business relates to Processing of business information, and occasionally it discloses or transfers data to foreign recipients. Your Personal Data, which is an integral component of business information that you 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 your rights as the Data Subject, as well as effective legal remedial measures.

Section 8. Key Legal Bases for Processing of Data

8.1 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 the Privacy Policy, Privacy Notice and other relevant terms and conditions.

8.2 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.

8.3 Contracts with A Data Subject or Related Persons

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

It is within the Data Subject's sole discretion to provide Personal Data to the Company. If the Data Subject does not provide the Company with the Personal Data as requested, whether in



Privacy Notice

Business Online Public Company Limited

whole or in part, the Company may not be able to comply with the request of the Data Subject, or enter into a contract with the Data Subject or the related persons.

8.4 Legal Obligations of the Company

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

Section 9. Processing of Personal Data by Automated System

The Company does not process your Personal Data by using an automated system.

Section 10. Retention Period for Personal Data

The Company will retain your Personal Data as long as it is necessary and appropriate for the purposes of operating such Personal Data. The retention period for Personal Data will be as follows:

- (1) In case of Personal Data of a target group to whom the Company's products or services will be offered, the Company will retain this Data for a period of 5 (five) years after the Processing of Personal Data is finished;
- (2) In case of Personal Data of a customer who buys the products or uses the Company's services with an agreement to buy the products or use the services, the Company will retain the Personal Data of the Data Subject throughout the period for its business operation;
- (3) In case of Personal Data of a shareholder of the Company, a Person or juristic person holding share(s) of the Company, Data of an investor or Personal Data of an executive committee, the Company will retain this Data for a period of 10 (ten) years after termination of the relevant contract or completion of the operation; and
- (4) In case of Data of a Person who accesses the Company's area, the Company will retain such Person's Data throughout the period for its business operation,

Unless there is a law stipulating a specific retention period, when the Company needs to use or process such Personal Data, or needs to comply with the laws or orders of relevant competent officers or government agencies. However, in case of court proceedings, your Personal Data may be collected until such proceeding is terminated, or for a period for taking any action necessary for achievement of the purpose. Then, your Data will be deleted or collected to the extent permitted by the laws.

Upon the lapse of the retention period, the Company will delete, destroy or anonymize the Personal Data, or take any action in accordance with the laws regarding Personal Data protection for efficiency of the Personal Data Protection.



Privacy Notice

Business Online Public Company Limited

Section 11. The Rights of the Data Subject

11.1 When the Personal Data Protection Act B.E. 2562 (2019) comes into effect with respect to the Company, you as the Data Subject have the following rights to manage your Personal Data which is under the supervision of the Company.

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

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

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

You have the right to access your Personal Data and to request the Company to provide you with copies of such Personal Data, including requesting the Company to disclose the acquisition of the Personal Data collected without your 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.

You have the right to object to the collection, use or disclosure of your Personal Data at any time.

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

You have the right to request the Company to delete, destroy, or anonymize your Personal Data to become the anonymous data in the event that the Personal Data is no longer necessary for its purpose, or that you have withdrawn your 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.

You have the right to restrict the Processing of your Personal Data when the Company is undertaking an examination process in accordance with your request, or in other cases stipulated by laws.



Privacy Notice

Business Online Public Company Limited

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

You have the right to request the Company to rectify your 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.

11.2 If you wish to exercise any rights as specified in Section 11.1, you may contact the Company to request a “Request Form for Exercise of the Data Subject’s Rights” to express your intention to exercise any of your rights and send it to the Company via the email address of the Customer Service Center at bolservice@bol.co.th or contact the Company at telephone number 02-657-3999 ext. 3. In such case, the Company may contact you for further information regarding the request form and the Company will use its best effort to respond to your 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 your request to the extent permitted by law, whereby the Company will notify you of the reason for such refusal. If you are a minor or incompetent Person or a quasi-incompetent Person, exercising your rights is conditioned upon consent from the Person exercising parental responsibility over the minor, custodian or curator, having the power to act on behalf of the minor, incompetent Person or a quasi-incompetent Person, as the case may be.

Section 12. Personal Data Security

12.1 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.

12.2 All employees of the Company are required to complete training relating to Personal Data protection and Data 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.

12.3 Policies and procedures for securely managing Personal Data and preventing unauthorized access implemented by the Company are as follows:

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



Privacy Notice
Business Online Public Company Limited

- (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 Data in a contract between the Company and each partner; and
- (5) Regularly assessing the Company's Personal Data protection, Data management and Data security.

Section 13. Contact Information of the Company

If you have any inquiries or suggestions about the Notice or compliance with the Notice, the Company is pleased to answer such inquiries and to hear suggestions for the benefit of Personal Data protection and further improvement of the Company's services. You can reach the Company via the following channels:

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



Privacy Notice
Business Online Public Company Limited

Section 14. Amendment of the Notice

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

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

Effective Date

Notice No.: 2.1

Effective date of this Notice: 4 January 2024

This Notice was recently amended on: 13 December 2023