

Policy of personal information security

Regarding to Our Bowins Silver Company and Bowins Future Company are very engrossed to develop our service of silver bar and silver grains for all relevant parts. In order to customer group or concerned people with our company are reliable with our services and products, making an impression and also reliable us about society and environment responsibility.

As our attention, we considerably concentrate on personal information security of customer group, trading partner, business alliance and initial company personnel. Therefore, we set our policy and operating direction as well for creating management mechanism to secure the personal information as per universal standard following to Personal Data Protection Act B.E.2562 (2019) and additional revision (of law).

Hence, this personal data protection policy announcement will notice to all concerned to know our company gathering method, apply or revealing the personal data, data type and objective of these proceed. Including information about keep data period, reveal the personal data to outsiders, the right of own data, personal secret security and method of data owner enable to contact with our company.

This announcement of personal data policy security has been applied for the person (“data owner”) as following...

(A) Customer of company and affiliated company group

Ordinary person customer is existing customer and current customer of our company and affiliated company group which has status as lawful natural person

Juristic person customer both legal registered or unregistered is director, shareholder, indeed beneficiary, employee, guarantor, collateral provider and legal representative of existing and current juristic person customer. Including other authorized ordinary person who can do instead of that juristic person.

(B) Trading partner, business alliance and outsider who are not being our customers.

Apart from giving security for trading partner and business alliance, this policy also covered to outsiders who have no status as customer of company or company group. Such as ordinary person or juristic person who maybe interested in products and/or services of our company or express their interesting in products and/or services of our company, people who visit company website, social & marketing activities that our company or other person who get this preparation. Or company application, or coming to visit company for getting service at the office/or trading partner that we may have necessity to be collect, use or reveal that personal data.

(C) Employee of company and employee of affiliated company group

Apart from employees of Bowins Silver Co., Ltd. and Bowins Future Co., Ltd. This policy also secured covering for employees of all affiliated company group.

1. Method to get personal data

Our company has collected personal data by method as following: -

- 1.1 Personal data which we received by serviced access through head office, branch office, branch of affiliated company group.
- 1.2 Personal data which we received by visiting on our company website such as internet service access name and IP address via internet accessing / date and time of visiting on website, website page and website address that direct link with company website.
- 1.3 Personal data which we received from trading partner, business alliance or company's agent such as shop's agent, company which gives service to collect data or vocation consultant, and etc.
- 1.4 Personal data which we received by application usage or all online platform of company. Our company may collect log files, application usage or online platform of company.
- 1.5 Personal data which we received from public records and non-public records. For an example; sales campaign activity, social media, 3rd person platform online or other public data resource that company has right in law to collect.
- 1.6 Personal data which we received from governmental bureau or bureau in legal authority control.

2. Objective to collect, use and reveal personal data

Our company has an objective to collect, use or reveal personal data on the standard by proceeding as below.

2.1 Collecting, using or revealing personal data from concession.

In this case, our company will proceed to request concession from customer to collect, use and reveal personal data. In order to their own data will get the highest advantage, and following intention of their concession. Including company is efficiently serviceable as per data owner's requirement. Not limit objectives as below.

(A) All services that concern about service and product present contact, giving information, inform about the privilege that is suitable and specific for data owner. And also manage the relationship with data owner.

(B) Survey, research and analyze the data in order to develop products, service, expansion of business, serviced campaign promoting both existing and future planning of company to totally and extremely meet needful of data owner.

(C) Confirmed verification and/or identify of data owner to access in service channels of company which not relevant with contractual agreement. Such as website service usage and/or company application. For the purpose that data collecting may have some sensitive personal data; for an example data about politics, religion or blood group. Our company affirm to carefully operate with the sensitive data and also under legally standard.

(D) Sending or transferring your personal data to foreign country (except in case of define in Personal Data Protection ACT, B.E.2562 (2019) is actionable under other law basis or without asking for the permission).

(E) Giving data to affiliated company group, business partner and reliable business alliance of company following with objective (A) and (B) as above.

2.2 Collecting, usage or revealing personal data as per agreement or contract that data owner made that agreement.

For this case, our company will operate as per requisition, agreement and/or contract of data owner which made the agreement with company. If data owner refuse to give data or request company to end of data collecting, usage or revealing personal data from agreement. And/or company contract, our company have to end some parts of service to data owner which also include but not specify objectives as following.

(A) Requisition operating and/or agreement between data owner and company before legal contract making. Including, approved consideration about coming to make an agreement and/or contract, data processing as per requisition or suggestion. Goods delivery and/or service to data owner which include any action of company. If not act to do, it may have an effect to agreement operating, and/or contract or may not completely requisition respond and/or suggestion of data owner.

(B) Confirmed verification and/or identify of data owner to proceed under (A), although including with any transactions between data owner and company.

(C) Operating as per requisition, agreement and/or legal contract that made between data owner and company. Including with other proceed completely objectively finished as per requisition, agreement and/or legal contract. Such as transaction alert, proceeding as per data owner command (Buying/Selling order of gold from trading accounts of precious metal, data answering, suggestion or modification proceeding as per complaint's data owner) and command confirmation of data owner.

(D) Using the right as contract, law or any agreement that made between data owner and company such as debt collection or damages which data owner has outstanding debt. Regulations and conditions amendment or agreement. Using right to deduct cut off the account.

(E) Giving services and application managing on Mobile application and platform of other online products that available in the contractual agreement that made between

data owner and company including also with concerned person as per contractual agreement.

(F) Record of transaction processing and/or reporting that involve with data owner such as affirmation document of member status, transaction reporting document following data owner's requisition or initial reporting document of company.

2.3 Collecting, usage or revealing personal data as per legal duty of company.

Regarding to giving services following business objective of company will proceed under law, regulation, command or concerned announcement which governmental office or assigned authorized office. Therefore, company has extremely necessity to collect, use or reveal personal data to conform and also following with the criteria which also include but not specify objectives as following.

(A) Operating as law that concerned to assembled business such as Personal Data Protection ACT, B.E.2562 (2019) and additional revision, protecting law and suppress money laundering, protecting law and suppress financial supporting for terrorism and weaponry expansion that have high destructive power including other law that company must operate following to internal Thailand country law and universal law.

(B) Operating as regulations and/or command of authorized person such as command of court, command of government, bureau that has duty to regulate the company or officer who has duty to regulate the company.

2.4 Collecting, usage or revealing personal data according to the law of company.

Apart from the objective as per legal duty of company, we may proceed to collect, use or reveal personal data following the legal right of company. Although, proceeding on the legal rights of company must under fundamental rights respective importantly of data owner. And collecting, usage or revealing in the part of specific really necessary data, all included but not specify objectives as following.

(A) Security management for protecting the personal rights, security on property's company, personnel and personal data owner or generally public people. Company may proceed to collect data from CCTV photo recording, registered data exchange ID card or QR code scanning entering to the area and/or data owner photo recording before entering to the area of business operations company. Keep monitoring data network activity logs, specify concerning about Security incidents, etc. Apart from data collecting, our company may use or reveal some data or all of data. In order to analyze in risk of security such as personal data to analyze for preventive measurement of lawful crime, corruption, money laundering or other actions that might be violate in law, etc.

(B) Internal company management, internal checking, internal controlling, business proceeding and operating as per policy and company procedure. Including

proceed involved about risk, security, account inspection, financial and accounting. And proceeding for business continuity of company.

- (C) For complaint management, dispute or other demand requirements.
- (D) Contacting and communication before coming to act in the law, and/or any transactions between data owner and company.
- (E) Research, planning, and statistics analyze such as gold trend investment analyze with age range of investor etc.
- (F) Customers database arrangement, partner and business alliance and personnel of company including with current data reviewing.
- (G) Giving information to vocational consultant whom company hired. Such as accounting offices, law offices, external auditor etc.
- (H) In case of company has plan to register into stock exchange of Thailand, sell of our business, transfer of our business, merge of our business, recover of our business or other relevant caused. Company may reveal or transfer personal data of data owner to outsiders who concerned with that transactions.

2.5 Others law caused.

- (A) Historical documents arrangement or archives for public advantage or involved about study of research or statistics.
- (B) Personal life, body or health danger protections or suppressions.
- (C) It is necessary for operating on duty to carry out the mission for public advantage or for powering usage of officer.

3. Personal data that company has collected.

Personal data is data related with that person who is owner of data which company can identify that personal owner both direct or indirect way. But excluding with data of decedent, especially [Section 6 Personal Data Protection Act, B.E.2562 (2019)].

Company will collect personal data both in the part of general data and sensitive data as per method no.1. By company will source out details for each data type by pattern as following.

Data type	Details
Personal data	1. Name – Surname 2. Date, Month of birth
	3. Age 4. Nationality
Identify proofing with company.	1. Copy or photo of Identity card / Number of ID card
	2. Photos or copy for face of data owner who made transaction

3.Photos of VDO for personal details of data owner who made transaction with company.

4. Copy or photos of passport / passport details

5. Copy or photos of government ID card/government officer

6. Signature

7. Tax ID number

Contact details 1. Address data as per house registration / current address

2. Email

3. Account details or ID for social media or ID for communicate via internet programs such as Line, Facebook etc.

4. Home phone number / workplace / place of business

5. Mobile phone number

6. Fax number

7. Name-Surname and personal contact details with company

8. Call center conversation voice recording

Data of buy & sell transaction 1.Reference contract number buy & sell and buy & sell account.

2. History of account user

3. Details buy & sell command as contract

4. Details of payment / goods delivery and payment

status

5. Payment status / goods delivery

6. Sales person name and Sales person code

7. Bank account details for making a transaction

System data 1. GPS location of data owner

2. IP Address

3. Time and period visiting in application or website

As the company focuses on managing personal data protection in accordance with international standards, and in accordance with the Personal Data Protection Act B.E. 2562(2019) and its amendments, giving the owner of the data the right to effectively use, control, cancel, or otherwise manage their personal information. The data owner can notify the company about exercising their personal data rights. The details are as follows:

4.1 Right to be informed

The Company will inform the details and purpose of data collection, use, or disclosure of personal information to the data owner before or during the process that the data owner has the right to know that type of information does the company store, Storage period Including where and how to contact the company. The company will inform you of the terms and privacy protection policy via the company's website. www.bowingroup.com And you can inquire further via the contact channels in Section 11.

4.2 Right to access and request a copy of personal data

Data owner have the right to access and obtain a copy of their personal data, which is under the responsibility of the company or request disclosure of the acquisition of information by the owner of the information. This is unless the company may refuse. Request to exercise the rights of the data owner If there is a legal reason or injunction or it is the case that such request may have an impact that causes damage to the rights and freedoms of other people.

4.3 Right to correct personal information

Data owners have the right to request the company to correct and update their personal information to keep it current, complete and not cause misunderstandings to those who have rights to use or access the information.

4.4 Right to request deletion or concealment of personal information

In the case where personal information loses its usefulness or importance in keeping for the purpose or is personal information that the company publishes in public areas or the information easily accessible. Data owners have the right to request that the company delete or destroy their data, or cause such personal information to be in a concealed form that cannot identify the data owner. This is except in cases where the company may have legitimate grounds to deny the data owner's request.

4.5 Right to withdraw consent

In the event that the data owner has given consent to collect, use, or disclose personal information to the company. The data subject can revoke that consent at any time during the period the consent remains valid. By going through the steps and methods specified by the company. However, the company will consider processing the request. Includes legal limitations on the right to withdraw consent, and/or limitations on contractual rights that benefit the data owner.

Withdrawal of the data subject's consent will not affect the collection, use, or disclosure of personal data that the data subject has duly given consent to. However, it may affect some of the company's services to data owners.

4.6 Right to request suspension of use of personal information

The data owner has the right to request the company to suspend the use of your personal data in certain cases, for example, the data owner wants to stop destroying the data when the time period for destruction has expired. Because it is necessary to use the information for legal purposes. or exercising rights to demand or request the company to stop sending their personal information to third parties According to the request of the data owner, etc.

4.7 Right to request and transfer personal data

Data subjects have the right to request that the Company transfer all or part of their personal data to a third party. This is information that the company can prepare in a format that can be read or used by the general public. Tools or devices that work automatically and can use or disclose personal information by automatic means in addition, the data owner can request such prepared information from the company. Requesting to exercise rights in this section must not violate the law, contract, or violate the rights and freedoms of other persons.

4.8 Right to object to the collection, use, or disclosure of personal information.

Data owners have the right to object to the collection, use, or disclosure of their personal data. In the case where the company performs such action under the objective of legitimate interest or the purpose is to prepare historical records, statistical data, or general information that is of public interest. The company will consider the request of the data owner together with Statutory limitations and rights public interest and conditions that the data owner has agreed upon with the company.

4.9 Right to complain

Data owners have the right to complain to the Personal Data Protection Commission or the Office of the Personal Data Protection Commission. In the case that the company or persons assigned by the company to carry out actions that are legal However, if the data owner wishes to complain only to individual officials or representatives from the company, they can file a complaint with the Company's Personal Data Protection Committee through contact channels.

5. Use of personal data of particularly sensitive persons

In offering products or providing services of the company or carrying out the Company's personal data collection purposes in some cases It is necessary for the company to collect specially sensitive personal data Such as information on race, religion, philosophy, sexual behavior, disability, trade union information. genetic information Biological data and health data, etc. In this case, the company will notify and request consent from the owner of personal data. To use particularly sensitive personal data to carry out the Company's personal data use purposes.

6. Disclosure of personal information to other persons

The Company may disclose the personal information of the data subject to the following persons or organizations. Under the criteria specified by law.

6.1 Companies and affiliated groups or business partners of the company Insurance companies that have entered into contracts with the company and/or any other person that the company has legal relations Including directors, executives, employees, employees, contractors, agents, and consultants of the company. and/or of such persons who are involved with personal information

6.2 Government agencies and/or agencies that are responsible for regulating companies, such as the courts, the Royal Thai Police, and the Securities and Exchange Commission (SEC), Social Security Office, Revenue Department, and Anti-Money Laundering Office (AMLO), etc.

6.3 Partners or any other organizations involved in the legal relationship between the data owner and the company, such as investment advisers, gold trade associations. Thai Silver Jewelry Exporters Association National Gem and Jewelry Institute of Research and Development (Public Organization), Association of Independent Auditors Securities Depository Center Foreign financial institutions clearing house Debt collection agents and lawyers, where the disclosure of personal information will be for the purposes of the contractual provisions. Related Laws and safety measures

6.4 Persons involved in the case of a company listed on the stock exchange Organizational restructuring Selling assets or claims of the company or merger of companies The Company may need to transfer or disclose information to such person in order to carry out that business.

6.5 Third parties who provide various general services to the Company, such as IT Service providers, marketing analysis and comparison service providers. advertising media company This includes but is not limited to agents. or subcontractors acting on behalf of the company

6.6 Third party collateral providers

6.7 Employer, attorney Your sub-attorney, agent or legal representative who has legal authority.

7. Period for keeping personal information

In the case that the data owner has a legal relationship with the company, such as making a contract to buy silver bars, silver coins, employment contracts, etc. The Company will retain your personal information throughout the period that the legal relationship is effective until its termination. However, for some information, the Company may extend the storage period for personal information as appropriate and necessary for each personal information. Type and purpose as specified by law (such as civil and commercial law Laws to prevent and suppress money laundering Laws for preventing and suppressing the financing of terrorism and the proliferation of weapons of mass destruction. accounting law Tax law, labor law and other laws that the company must comply with Both within and outside the country) where data owners can inquire about the storage period of their data through the company's contact channels. The company reserves the right to notify information subject to actions required by law.

8. Sending or transferring your personal information abroad

The Company may need to send or transfer the personal data of the data subject abroad. Due to the condition of the silver trading business It has the characteristics of being traded and exchanged on a wide scale and covers many countries around the world. The company will send personal information to the recipient in a secure and reliable manner. By means of standards specified by law. To protect the security of the data owner's personal information. If it is the case that the company needs to send personal data to a country where security standards are insufficient. The company will notify to request consent on a case-by-case basis from the data owner before sending it again. In addition to delivering information for business needs The Company may need to send personal information abroad for necessary reasons as follows:

8.1 To comply with the law or according to the legal authority. Specified or notified to the company to comply.

8.2 To comply with the contract or any other legal relations that the data owner has made with the company. or at the request of the data owner

8.3 To comply with promises or other legal relations between the company and shareholders, taking into account the interests of the data owners.

8.4 It is to prevent or stop danger to the life, body, or health of the data owner or other persons. When the company is unable to obtain consent at that time

8.5 The delivery is for the purpose of important public benefit.

9. Use of cookies

Cookie means “information placed on the data subject's computer by a web server. After the cookie has been placed on your computer Cookies collect and remember the user's information until the user closes the browser. or until the user rejects cookies.”

We may use cookies or similar technologies in our products. and/or services of the company Including using the website and company applications The collection of such information has an important purpose. To raise product standards and/or service Including to provide the data owner with products, services and information. that responds most directly to the needs of data owners.

10. Use of personal information according to the original purpose

The Company reserves the right to collect, use or disclose personal information in the Company's possession before the effective date of the law for the original purpose. In doing so, the company will take into account human rights principles and legal criteria as important. However, if the data owner wishes to exercise the right to own personal data according to Section 4. You can make a request via the company's contact channels.

11. Security

The company has strict safety measures and policy enforcement in place. To carry out this policy The company has provided personnel, business partners, and the company's contractors must comply with the standards and personal data policies that the company has announced. Including the company has also hired expert personnel. and equipment necessary to protect personal information in the possession of the Company. and to provide convenience to data owners.

12. Company contact channels

If the owner of the data Or people in general have questions or want to ask for more details about the announcement of the company's personal data protection policy. or want to request to exercise rights Please contact the company through channels

Contact the company's personal data protection officer at suport@bowinsgroup.com or contact (will there be a new email address?)

: Bowins Silver Company Limited (Branch 00004)

Address 74/1 Soi Sukhapiban 2, Soi 31, Dok Mai Subdistrict, Prawet District, Bangkok 10250

Phone number 02 720 3000

13. Changes to the Privacy Policy Notice

The Company reserves the right to change or amend this Personal Data Protection Policy announcement from time to time. The Company will announce the current Personal Data Protection Policy on the Company's website. www.bowinsgroup.com

Announced on December 1st, 2024