

Personal Data Protection Policy

Nova Capital Limited ("the Company") acknowledges the importance of personal data and other customer-related information and is committed to maintaining the security of the data, as well as your privacy, effectively. We assure you that Company is committed to transparency and accountability in the collection, gathering, usage, disclosure, or transfer of your data in accordance with the Personal Data Protection Act B.E. 2562 and other relevant laws.

Personal Data Protection Policy

This Personal Data Protection Policy specifies details regarding the collection, storage, disclosure of personal data of customers, and the relevant rights of customers, as well as the methods for managing other personal data that is disclosed to the public, with the aim of informing the aforementioned topics.

1. Definitions

Customer refers to individuals targeted for the Company's sales operations, which will be further defined and used in this policy.

Personal Data refers to information about individuals that directly or indirectly identifies them, such as name, surname, national identification number, date of birth, address, and sensitive personal data, excluding personal data of deceased persons.

2. Personal Data Collected by the Company

The company will collect the following personal data:

2.1. Identifiable information provided on application forms, such as name, age, date of birth, national ID number, address, phone number, contact information, financial information, and so on.

2.2. Identifiable information obtained directly from customers through meetings, such as name, surname, date of birth, national ID number, address, phone number, contact information, etc.

2.3. Personal data obtained without direct customer encounters (including data received from phone contacts), such as name, surname, date of birth, national ID number, address, phone number, contact information, audio conversation files, etc.

2.4. Personal data received in written or electronic form, such as name, surname, date of birth, national ID number, address, phone number, contact information, etc.

2.5. IP addresses and cookies obtained from accessing the company's website.

3. Methods of Collection and Sources of Personal Data

The company has the following methods of collecting personal data:

The company collects personal data directly from customers through the completion of application forms or relevant documents.

3.1. Direct Collection of Data from Customers

- Loan application documents submitted during the loan application process with the company, and information obtained from telephone inquiries.
- Documents received by the company from submitted applications, and various types of forms.
- Data obtained from inquiries regarding service details and information received during the provision of services to customers when they use services at service points, during off-site customer visits, and through various communication channels such as telephone, email, or other means of communication.

- Information filled out for personal loan applications through the company's website.
- Data on the usage of the company's website, which is derived from accessing the company's website.
- Collection of data from third parties.
- The Bank of Thailand (BOT)
- National Credit Bureau Company Limited (Credit Bureau)
- Anti-Money Laundering Office (AMLO)
- Relevant individuals in the customer's workplace for credit verification purposes.
- Individuals associated with the customer's workplace or references provided by the customer for debt collection inquiries.

4. Purposes of Collection, Use, and Disclosure of Personal Information

The company aims to collect, utilize, and disclose personal data for the following purposes:

Credit application processing, Credit evaluation, Credit provision for customers

- Management of customers' personal credit accounts
- Development of customer service
- Sales promotion activities
- Customer data analysis
- Product development
- Compliance with relevant laws and regulations

The company will collect, use, and disclose personal data only as necessary for the purposes stated above or as consented by you, or as permitted by law under the Personal Data Protection Act B.E. 2562 or other relevant laws.

5. Disclosure of personal information to third parties.

The company may disclose personal information to third parties in the following cases:

5.1 Compliance with laws and requests from government agencies.

- Bank of Thailand (BOT)
- Credit Bureau Public Company Limited (Credit Bureau)
- Anti-Money Laundering Office (AMLO), Police Officers, Courts
- Processing requests from each government agency in accordance with other laws of the Kingdom of Thailand.

5.2 Performance of duties related to contracts with customers.

- Customer recruitment operations
- Loan provision operations for customers
- Account management operations (debt collection)
- Printing and sending documents (invoices, annual reports, debt collection letters, etc.) to customers
- Transporting and storing customer application forms
- Development, utilization, and maintenance of customer account management systems
- Individuals to whom the company transfers or sells its debts, with time for the transfer or sale.

5.3 Customer service operations

5.3.1 Operations related to improving advertisements for online recruitment to be as suitable as possible.

The third parties to whom we may disclose personal data may include individuals and legal entities from foreign countries, which may be subject to data protection

laws equivalent to those in Thailand, or individuals and legal entities from foreign countries that are not subject to data protection laws equivalent to those in Thailand.

5.3.2 Data Retention and Storage Periods for Personal Data

The company will retain personal data as follows:

- 1) Nature of storage: Stored as physical documents and electronically
- 2) Location of storage: In the case of physical documents, the company stores them in a room or cabinet equipped with security devices. In the case of electronic methods, the company stores them on a server installed in a room equipped with security devices.

5.3.3 Duration of storage

Types of personal data	Duration of storage
Personal data such as name, date of birth, national identification number, address, phone number, and contact location (excluding audio conversation files, IP addresses, and cookies).	15 years
Audio conversation files	6 months
IP Address	6 months
Cookies	3 months

- Unless there are other reasons under the law that allow longer retention, such as for legal compliance purposes or for exercising legal rights.
- Procedures upon expiration of the storage period
- Personal data stored as physical documents will be destroyed within 3 months after the end of the storage period.
- Personal data stored electronically will be deleted within 1 month after the end of the storage period.

6. Customer rights

6.1 Customers have the following rights:

- 1) Right to Withdraw Consent: Customers have the right to withdraw their consent at any time during the period when their personal data is stored by the company.
- 2) Right to Access Personal Data: Customers have the right to access their own personal data and have the right to request the company to provide copies of such personal data. This includes the right to request the company to disclose the sources of personal data that the customer has not consented to provide to the company.
- 3) Right to Correct Personal Data: Customers have the right to request the company to correct any inaccurate information, ensuring that the data is up-to-date. They may also request the addition of incomplete information or the correction of information that may cause misunderstanding.
- 4) Right to Erasure of Personal Data: Customers have the right to request the company to delete their personal data under certain circumstances.
- 5) Right to Restrict Processing of Personal Data: Customers have the right to request the company to restrict the processing of their personal data under certain circumstances.
- 6) Right to Data Portability: Customers have the right to request the transfer of their personal data provided to the company to another controller or to themselves under certain circumstances.
- 7) Right to Object to Collection, Usage, and Disclosure: Customers have the right to object to the collection, usage, and disclosure of their personal data by the company under certain circumstances.
- 8) Right to Lodge a Complaint: Customers have the right to lodge a complaint regarding any infringement if the company violates the Personal Data Protection Act of 2019.

- 9) Customers can contact the Data Protection Officer of the company to file a request for enforcement of their rights. (Contact details are specified in the "Contact Information for Personal Data Inquiries" section.)
- 10) Customers can review the details of terms and conditions, as well as exceptions to rights under relevant laws, on the website of the Ministry of Digital Economy and Society (MDES).
- 11) Customers are not required to pay any fees for exercising the aforementioned rights. However, in cases where a request is deemed unreasonable or involves costs beyond what is reasonable, except as required by law where the data controller is responsible for such expenses, the company may charge fees to customers as necessary.
- 12) The company will consider customer requests and notify the results of the consideration within 30 days from the date the company receives such requests.
- 13) In the following cases, the company may need to reject customer requests in order to comply with relevant laws:
 - In cases where it cannot be clearly demonstrated that the requester is the owner of the data or has the authority to make such requests.
 - The request is unreasonable, such as when the requester has no right to access the personal data or when the requested personal data does not exist within our records.
 - The request is frivolous, such as repeated requests for the same information without valid reasons or when the content is identical or substantially similar to previous requests.
 - Complying with such requests may have implications that could potentially infringe upon the rights and freedoms of other individuals, such as disclosing personal information of third parties, revealing intellectual property, or disclosing trade secrets of third parties.

- Other reasons as required by law, such as compliance with legal obligations, compliance with court orders, or defending against legal claims.

7. Marketing activities and promotions

The company will send information about marketing activities and promotions related to the services provided by the company that customers may be interested in, for the efficient provision of services. If customers receive such information from the company, they have the right to withdraw their consent and refuse to receive such information from the company at any time, following these steps.

Furthermore, when the company contacts customers by telephone to provide information about marketing activities and promotions, you may inform the staff that you do not wish to receive such information.

8. Definition of Cookies

Cookies are text files stored on a customer's computer to collect details about their website usage log or browsing behavior on your website. This includes usage history and data entered during website usage on the internet. These are recorded as files on the customer's computer when they visit the website. If a customer revisits the same website, they do not need to re-enter the same information each time to use the service. Additionally, the display settings for each customer can be changed because they are referenced from the cookie data stored on their computer by the website controller. If customers consent to receive and send cookies, the website can receive cookies from their browser.

9. The use of cookies

The company will collect website visitation data from every visitor through cookies or similar technologies, and it will use cookies for the purpose of improving the efficiency of accessing the company's internet services, including enhancing the usability of the company's internet services.

9.1 Other types of companies include:

- In order for customers to continuously sign in to their accounts on the company's website.
- Third-party individuals hired by the company to disseminate advertisements may collect cookies from the company's website to improve the targeting of advertisements to customers.

9.2 Types of cookies used by the company

- 1) To use for remembering items customers have selected as preferences in their usage, such as the language they use.
- 2) To use for remembering items customers have previously visited in order to present relevant products, services, or advertisements matching the customer's interests.

9.3 Personal Data Protection Policy of Other Websites Accessed Through the Company's Website

The company's personal data protection policy is solely for the company's services and the use of the company's website. This personal data protection policy cannot be applied to other websites apart from the company's website, even if accessed through links on the company's website.

Therefore, please review the personal data protection policies on websites other than the company's website to understand how those websites may use your information.

9.4 Changes to the Personal Data Protection Policy

The company will regularly review and adjust this personal data protection policy to ensure compliance with relevant laws and regulations or in cases where it is deemed necessary for operations. If there are any changes to the personal data protection policy, the company will notify you through its website.

9.5 Contact channels for inquiries regarding personal data

- Internal contact channels for inquiries within the company:
Personal Data Processor
33/4 36th floor, A Building, The Ninth Tower Grand Rama 9, Huai Khwang sub-district, Huai Khwang district, Bangkok 10310
Website: <https://novacapital.co.th>

- Contact channels for inquiries aside from the company:
Office of the Personal Data Protection Committee

10. Development and revision of data protection policies.

The development and revision of the company's personal data protection policy were completed on February 14, 2024.