



Privacy Notice for Vendor and Business Associated Persons

Announced on 31 October 2025

As Pi Securities Public Company Limited, including its affiliates and Country Group affiliates¹ (collectively referred to as the “Country Group”, “we”, “us” and “our”), in our capacity as a personal data controller under the Personal Data Protection Act B.E. 2562 (2019), places great importance on your privacy, including your personal data and the security measures for safeguarding such data, this Privacy Notice has been prepared. The purpose of this Privacy Notice is to assure you that the Country Group will supervise the collection, use, and disclosure (collectively referred to as “process”) of your personal data in a manner that is lawful and consistent with the intended purposes. To ensure that the processing of your personal data is accurate, lawful, and aligned with applicable legal requirements, the Country Group has established this Privacy Notice (“Notice”) to inform you of our practices regarding personal data, the reasons for processing your personal data, and your rights as a data subject under the Personal Data Protection Act B.E. 2562 (2019) and relevant regulations (“Personal Data Protection Laws”).

1. Who does this Notice Apply to?

This Notice applies to data subjects whose personal data is processed by the Country Group. Such data subjects may fall into one or more of the following categories:

Categories of Data Subjects Covered by this Notice

- “Vendor” refers to any natural person who sells or intends to sell goods and/or provides or intends to provide services to Country Group and its affiliates. This definition also includes natural persons acting as representatives or authorized persons of a legal entity that is a vendor of Country Group. Furthermore, it covers natural persons whose personal data are collected by Country Group for the purposes of communication or conducting transactions between Country Group and such persons or the legal entities for which they serve as employees, staff, representatives, or authorized persons.
- “Business Associated Persons” refers to any natural person who is not a customer or vendor of Country Group, but who is otherwise connected with the business operations of Country Group. Examples include business partners or individuals performing duties within government agencies that have authority to regulate the business operations or legal compliance of Country Group. This definition also includes

¹ Please check the list of affiliated companies from the website <https://www.cgholdings.co.th/th/our-investments>



natural persons acting as representatives or authorized persons of legal entities that are business partners of Country Group.

2. Sources of Personal Data

Country Group generally collects your personal data directly from you. However, in certain circumstances, we may obtain your personal data from other sources, such as publicly available information on the DBD Datawarehouse+ website, or through advertising and public relations activities.

In cases where you provide Country Group with the personal data of third parties - for example, emergency contacts, reference persons, individuals related to your employment, meeting representatives, or proxies - you are requested to inform such third parties of the details of this Privacy Notice and, where required, obtain their consent or rely on another applicable legal basis prior to disclosing their personal data to Country Group.

3. Personal Data Processed by Country Group

Personal data refers to information that can identify you either directly or indirectly but does not include data of deceased individuals or data of legal entities.

Country Group collects various types of personal data and processes them for different purposes depending on the type of data and the data subject. To inform you of the personal data currently collected by Country Group, the data has been categorized as follows:

Type of Personal Data	Examples of Personal Data
identity data	<ul style="list-style-type: none">● title, first name, middle name, last name, nickname● signature● national identification number● tax identification number
government-issued identification documents	<ul style="list-style-type: none">● information on official documents issued by government authorities, such as copies of national id cards/passports, copies of professional licenses, copies of work permits, copies of visa stamps, copies of house registration documents, copies of name change certificates, or any similar documents used for identification and verification purposes
contact data	<ul style="list-style-type: none">● contact address, workplace● telephone number



Type of Personal Data	Examples of Personal Data
	<ul style="list-style-type: none"> ● email address
financial and contract data	<ul style="list-style-type: none"> ● payment channels, payment details, payment confirmations ● bank account number and bank account details ● contracts or agreements with country group
employment data	<ul style="list-style-type: none"> ● job position
profile data	<ul style="list-style-type: none"> ● work experience ● education background ● resume/cv ● professional certifications and licenses
legal data	<ul style="list-style-type: none"> ● information necessary for establishing or exercising legal claims

In cases where religion or blood type, classified as sensitive personal data, appears on a copy of a national ID card or passport from certain countries, and Country Group is required to use such documents for the purposes stated in this Notice without needing to process the sensitive personal data mentioned above, Country Group requests that you cross out or redact such sensitive personal data. If you do not cross out or redact the data, Country Group may proceed to do so in order to protect your sensitive personal data.

4. Purposes of Personal Data Processing

Country Group processes your personal data for the following purposes and lawful basis:

No.	Processing Purposes	Type of Personal Data	Lawful Basis
1	Communication and Coordination coordination and communication purposes.	<ul style="list-style-type: none"> ● identification data ● contact data ● employment data 	<ul style="list-style-type: none"> ● contract ● legitimate interest
2	Pre-contractual and Contractual Performance for the purposes of qualification consideration, recruitment, assessment, selection, and offering a contract for execution.	<ul style="list-style-type: none"> ● identification data ● government-issued identification documents ● employment data ● profile data 	<ul style="list-style-type: none"> ● contract ● legitimate interest



No.	Processing Purposes	Type of Personal Data	Lawful Basis
3	Internal and External Audit for the purposes of internal and external audits, including audits conducted under internal governance procedures, audits by external auditors, or reviews by regulatory authorities, to assess accuracy, transparency, and compliance with applicable laws, regulations, and relevant policies, as well as for risk management, internal control, and fraud prevention purposes.	<ul style="list-style-type: none"> ● identification data ● government-issued identification documents ● contact data ● financial and contract data ● employment data ● profile data ● legal data 	<ul style="list-style-type: none"> ● legal obligation ● legitimate interest
4	Contract Management and Contractual Performance for the purposes of entering contracts and managing contractual performance, including the receipt of goods or services, acceptance of work, and payment for goods or services.	<ul style="list-style-type: none"> ● identification data ● government-issued identification documents ● contact data ● financial and contract data ● employment data ● profile data 	<ul style="list-style-type: none"> ● contract ● legitimate interest
5	Contract Renewal for the purpose of assessing capability and suitability for service provision prior to contract renewal.	<ul style="list-style-type: none"> ● government-issued identification ● financial and contract data ● employment data ● profile data 	<ul style="list-style-type: none"> ● contract ● legitimate interest
6	Exercise of Legal Rights for the purposes of legal proceedings to establish rights, submit petitions or objections to competent authorities, and protect the lawful rights or legitimate	<ul style="list-style-type: none"> ● identification data ● government-issued identification ● contact data ● financial and contract data 	<ul style="list-style-type: none"> ● legitimate interest



No.	Processing Purposes	Type of Personal Data	Lawful Basis
	interests of Country Group in judicial processes.	<ul style="list-style-type: none">● employment data● profile data● legal data	

5. Disclosure of Personal Data to External Parties

Country Group may need to disclose your personal data to external parties for the purposes stated in this Notice. Such disclosure will be limited to what is necessary, and Country Group will implement appropriate measures in accordance with Personal Data Protection Laws.

Types of Personal Data Recipients	Examples
service providers supporting the operations of country group	<ul style="list-style-type: none">● technology system service providers, such as cloud computing and data platform providers● banks or payment service providers, including billing and financial transaction services● external auditors and professional advisors, such as accounting firms or law firms
government agencies	<ul style="list-style-type: none">● law enforcement organizations, such as court and authorized government officials● government agencies, such as the revenue department● regulatory authorities, such as the Stock Exchange of Thailand (SET), Thailand Futures Exchange (TFEX), Thailand Securities Depository Co., Ltd., Thailand Clearing House Co., Ltd., the Office of the Securities and Exchange Commission (SEC), the Anti-Money Laundering Office (AMLO) and Bank of Thailand
affiliates	subsidiaries and affiliated companies within the group of Country Group Holdings Public Company Limited (CGH)

6. Cross-Border Transfer of Personal Data

In certain cases, the Country Group may need to transfer your personal data to countries outside Thailand as part of its normal business operations. The Country Group will use its best efforts to transfer your personal data



only to trusted recipients in the destination country and will apply secure measures to ensure appropriate protection of your personal data.

If the destination country does not have adequate personal data protection standards, Country Group will implement all necessary and appropriate measures to ensure that the transfer complies with the requirements under the Personal Data Protection Laws.

7. Security Measures

Country Group has implemented appropriate security measures for the processing of your personal data. These measures include technical, organizational, and physical safeguards to maintain the confidentiality, integrity, and availability of your personal data.

8. Personal Data Retention

The Country Group will retain your personal data for as long as necessary to fulfill the purposes for which it was collected, or for the duration of any contractual or legal relationship between you and the Country Group, or for the period during which contractual claims may be exercised under the applicable statute of limitations, or for such period as may be required or permitted by law, including retention periods prescribed by regulators for supervisory or inspection purposes.

Once the retention period has expired and/or Country Group no longer has lawful bases to process your personal data, Country Group will proceed to delete or destroy your personal data or anonymize it so that it can no longer be used to identify you. This will be done in accordance with Country Group's internal policies or as required by applicable laws and regulations.

9. Your Rights as a Data Subject

You have the right to exercise various rights concerning your personal data under applicable Personal Data Protection Laws, subject to the conditions and criteria prescribed by such laws. In cases where you are under 20 years of age or have limited legal capacity, your rights may be exercised by a legally authorized representative. In this regard, your rights include the following:

- **Right to Withdraw Consent**

If Country Group has requested your consent to process personal data for specific purposes, you have the right to withdraw your consent at any time, unless there are legal limitations or contractual obligations that



provide benefits to you. Your withdrawal of consent will not affect the collection, use, and/or disclosure of your personal data that was carried out prior to the withdrawal.

- **Right of Access and to Obtain a Copy**

You have the right to access your personal data, request a copy of such personal data, or request Country Group to disclose how your personal data was obtained.

- **Right to Data Portability**

You have the right to request your personal data, which is under the responsibility of Country Group, in a format that is readable or usable by automated tools or equipment, and that can be used or disclosed through automated means. You may also request that such data be sent or transferred to other organizations or companies, where technically feasible.

Additionally, you have the right to request that Country Group directly send or transfer your personal data in such format to another data controller, unless it is not technically possible to do so. All such actions will be carried out in accordance with the scope and conditions prescribed by the Personal Data Protection Laws.

- **Right to Object to Processing**

You have the right to object to the processing of your personal data under certain circumstances as specified by Personal Data Protection Laws, such as when the processing is based on the Country Group's legitimate interests.

- **Right to Erasure or Destruction of Personal Data**

You have the right to request the deletion or destruction of your personal data, or to have it anonymized, within the scope permitted by Personal Data Protection Laws. However, in cases where Country Group stores your personal data in an electronic system that may not allow for deletion or destruction, Country Group may proceed to anonymize the personal data so that it can no longer be used to identify you.

- **Right to Restrict the Use of Personal Data**

You have the right to request restrictions concerning use of your personal data, for example, while Country Group is verifying the accuracy of the personal data in response to your correction request, or when the personal data is no longer needed by Country Group but you require it for legal purposes, within the scope permitted by Personal Data Protection Laws.

- **Right to Rectification**

You have the right to inform Country Group if your personal data is inaccurate, outdated, or incomplete, and to request correction. Country Group will verify and correct your personal data to ensure it is accurate, up to date, complete, and does not cause misunderstandings.



- **Right to Lodge a Complaint**

You have the right to lodge a complaint with the Personal Data Protection Commission (PDPC) and/or other relevant competent authorities if you believe that Country Group has violated or failed to comply with the personal data protection laws. You may contact the Personal Data Protection Commission (PDPC) via email at saraban@pdpc.or.th

Country Group reserves the right to limit your ability to exercise the above rights in accordance with Personal Data Protection Laws or other relevant laws. In some cases, Country Group may need to deny or be unable to comply with your request, such as when Country Group is required to comply with legal obligations or court orders, when the exercise of your rights may impact on the rights and freedoms of others, or when the request is deemed excessive or unreasonable.

In such cases, Country Group will inform you of the reasons for the denial. You may also file a complaint with the Office of the Personal Data Protection Committee and/or other competent supervisory authorities as prescribed. You may exercise the above rights via the following email: dpo@pi.financial

10. Amendments to the Notice

Country Group will review this Notice as appropriate to ensure alignment with relevant practices, regulations, and applicable laws. In the event of any amendments, updates, or changes to this Notice, Country Group will notify you of the updated version through the communication channels used in accordance with the relationship, legal acts, and/or contracts between you and Country Group.

11. Contacting Country Group

If you have any further questions regarding the processing of your personal data, you may contact Country Group through the following channels:

Country Group Location: 132 Wireless Road, Sindhorn Tower 3, Level 20, 25, 27, Lumpini, Pathumwan, Bangkok, 10330 Tel. +66 2 205 7000	Data Protection Officer Email: dpo@pi.financial
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