

Effective on **1 October 2025**

This Privacy Notice (this "**Notice**") is issued by Ayudhaya Development Leasing Company Limited (together, "**ADLC**," "**we**," "**us**," or "**our**").

A. How this Notice applies

This Notice is addressed to individuals with whom we interact and whose personal data we handle in the course of our contract to employment, total rewards and performance management, payment of salary, compensation and benefits, management or granting of benefits, employee relations and communications, organization development, training and development, individual development plan including the preparation of relevant reports, scholarship awarding, licensing and certification, succession plan and talent management, assessment of personality and leadership including skills and strengths, engagement and organizational culture survey through all approaches, opinion and personnel experience survey, human resources development through both domestic and international exchange program, charitable and public benefit activities, work relationship including our i) candidate for employment, (ii) employee including short-term employee, (iii) advisor, (iv) Company director, (v) secondee, (vi) dual-hatted employee, (vii) junior associate, (viii) outsourced staff, (ix) contractor, (x) agent, (xi) trainee, (xii) trainer and coordinator and (xiii) any other individuals about whom we obtain personal data (e.g. family members, references, guarantors, beneficiaries, emergency contact persons, related persons, and etc.) (together, "you" or "your").

B. Changes of this Notice

This Notice may be amended or updated from time to time to reflect changes in our practices or policies with respect to the collection, use, disclosure and/or transfer of personal data, or changes in applicable laws. You will be notified adequately of any such changes. We also encourage you to read this Notice carefully, and to regularly check this Compay website to review any changes we might make to this Notice.

C. How we collect, use, disclose and/or transfer and protect your personal data

The purpose of this Notice is to describe how we collect, use, disclose, and/or transfer your personal data. This Notice also tells you about your rights and choices with respect to your personal data as a data subject, and how you can reach us to get answers to your questions.

We may utilize technologies to collect, use, disclose, or transfer your personal data for the purposes outlined in this Notice. This includes, but is not limited to, the following technologies:

1. Blockchain, such as public blockchain, private blockchain, consortium blockchain, and etc.
2. Artificial Intelligence (AI) or Generative AI, such as ChatGPT, Google Gemini, Microsoft Copilot, AI Chatbot technology, and etc.
3. Cloud Computing.

1. What personal data we collect

1.1 Categories of personal data

"Personal Data" means any identified or identifiable information about you as listed below. If it is possible to combine any information with your Personal Data, or if other information is used to build a profile of an individual, we will treat such other information and combined information as Personal Data.

We may collect or obtain the following categories of information which may include your Personal Data, depending on the context of your interactions with us, and the type of data subject you are to us, as follows:

Category of Personal Data	Description and examples
Name and initials	Your information you are known, addressed, or referred to such as title, academic title, rank, first name/ initial, middle name/ initial, last name/initial, maiden name, aliases or previous names/middle name/last name, signature, electronic signature and rubber stamp signature.
Personal characteristics	Personal details about you such as age, date of birth, gender, height, weight, marital status, nationality, country of birth, citizenship, citizenship status, military details, leisure activities and interests, photographs, language skills, number of children, moving picture and/or voice recording in different formats such as phone conversation record, video or live broadcast.
Personal directory information	Your contact details such as home postal address, delivery address, home telephone number, home facsimile number, personal electronic mail address, personal cellular, mobile or wireless number, social media profile/handle, business postal address, business telephone number, business facsimile number, business electronic mail address, business cellular, mobile or wireless number.
Education information	Your educational and professional information such as degrees and schooling, licenses and professional membership, academic record.

Category of Personal Data	Description and examples
Employment information	Your employment details, status and history such as occupation/ title, position, function, employee identification number, corporate level, supervisor information , employer identification number, job code, corporate held credit or debit card numbers, work permit status, name, number and membership period of existing provident fund, employee welfare fund information, employment authorization details, reference and background checks, taxpayer identification number, workers compensation claims, employment records (including salary and benefits), recruitment date, length of service, work termination, assets in possession during employment, previous employer or current employer or the company in which you hold shares or are involved , reviews (performance and potential review, examination and competency assessment, functional knowledge and skills, leadership, behavior, strength, and individual development plan), use of technology and evaluation of the use of technology (Internet, email, line, etc.), and information about disciplinary records and compensation for loss.
Government issued identification numbers	A number or code given to you by competent authority to identify who you are such as national identification number, taxpayer identification number, other government-issued identification number, driver's or operation's license number, national identifiers for professional licenses, government sponsored health or food plan identifier, passport number, foreign registration number, work permit, group insurance number, and social security number and employee welfare fund information.

Category of Personal Data	Description and examples
Financial and transaction details	Your financial information, status and history such as information relating to background checks, credit bureau records, financial institution account number, financial transaction history, credit history, banking details, investments, savings, insurance claim history, source of income, income, salary, service fees, other compensation, compulsory employee salary deductions (e.g. court-ordered debt repayment, debt repayment to Student Loan Fund), voluntary employee salary deductions, financial assistance (e.g. benefits, staff welfare, staff loan benefits, assistance, gifts, subsidies), your purchase history (e.g. products, rentals, returns), household income data, monetary/non-monetary donation information and corporate card details.
Device information	Data in connection with device and usage of device and technical data such as geo-location, cell tower, data, audio, video, photos, camera access, calendar information, call logs, contact, address book, text messages or emails (content), unique device identifier, IP address clickstream, online website tracking, unstructured data, RFID, login credentials, any required security code, access code, or password, account usernames, account passwords, license number, telemetry or metadata, data related to end user activity e.g. browser visits (this applies even if we do not know the identity of the end user), cookies or other similar technologies.

Category of Personal Data	Description and examples
Views and opinions	Information about your view and opinion such as your preference about our contract to employment, training and development, scholarship awarding, licensing and certification, engagement and organizational culture survey, opinion and personnel experience survey, human resources development through both domestic and international exchange program, work relationship or other information that you choose to send to us (including submission via social media platforms or online polls) , comments, feedback, complaints, recommendations, survey responses, inquiries and any information you have volunteered during human resources related communications.
Vehicle details	Details about your vehicles such as vehicle brand, model, license plate number, and other details specified in the registration document.

If you do not provide your Personal Data, it may mean that we cannot provide you with the job position you request, we cannot meet all our obligations with respect to contract to employment, compensation and benefits, management or granting of Benefits, employee relations and communications, organization development, training and development, individual development plan including the preparation of relevant reports, scholarship awarding, licensing and certification, succession plan and talent management, assessment of personality and leadership including skills and strengths, engagement and organizational culture survey through all approaches, opinion and personnel experience survey , human resources development through both domestic and international exchange program, charitable and public benefit activities, work relationship with you, or we cannot comply with our legal obligations.

We may collect **your sensitive data** such as criminal records, health data, and biometric information.

Personal Data of third parties

If you give us Personal Data of other persons such as your mother's maiden name, spouse's information, family members' information, children's information, information of sponsors or dependents, information of the company's board members/ directors/ shareholders/ representatives/ chief managers, guarantor's information, beneficiary's information, or you ask us to disclose their Personal Data to third parties, you are responsible for notifying those other persons of the details of this Notice, including obtaining any required consent from such third parties (where consent is required). You must also ensure that we can lawfully collect, use, or disclose those persons' Personal Data as set out in this Notice.

Personal Data of minors, incompetent persons and quasi-incompetent persons

If we need to obtain consent from data subjects who are minors or who cannot lawfully give consent by themselves, we will not collect their Data until the consent of the persons exercising parental power is obtained. In addition, we will not collect any Data from quasi-incompetent persons or incompetent persons until the consent of their legal curators and guardians is obtained (as the case may be).

If we have not acknowledged that the data subjects are minors, quasi-incompetent persons or incompetent persons prior to the collection of their personal data, upon learning that we have collected Personal Data of minors without the consent of persons exercising parental power (when it is required and the minors cannot lawfully give consent by themselves), or from quasi-incompetent persons and incompetent persons without the consent of their legal curator and guardian (as the case may be), we will delete the Personal Data at the earliest convenience unless we can rely on other legal bases apart from consent.

1.2 Collection of your Personal Data

We may obtain your Personal Data directly from you or indirectly from other sources (e.g. publicly available sources), and/or through our affiliates (e.g. refer from other entities in Krungsri Group or MUFG Bank, Ltd. and its affiliates), outsourcing service providers, agents, subcontractors, recruitment service providers or platforms (including recruiters, headhunters, recruitment websites, social media platforms, event organizers), ADLC's work systems with employee database, business partners, or third parties (e.g. hospitals, universities, government entities, data companies, training and development service providers, examination and competency assessment service providers, academic institutes, website of entities or professional associations that oversee the licensing and certification, assessment of personality, leadership, strength and individual development plan service providers, opinion and experience survey service providers, engagement survey service providers, human resources development through both domestic and international exchange program, or work relationship service providers.

2. On what basis and why we collect, use, or disclose your Personal Data

2.1. Legal basis we may rely on

We thrive to determine our legal basis for our collection, use or disclosure of your Personal Data, as appropriate. In most cases, the legal bases which we rely on are any of the followings:

Legal basis	Description
Fulfilling contracts	To allow us to perform actions that are necessary for entering into contract with you and/or for providing you with the benefits under the contract with you.
Our legal obligations	To allow us to meet our legal obligations (for example, getting proof of your identity to meet our obligations under the applicable laws).
Our legitimate interests	To pursue our and other's legitimate interests (for example, to detect and prevent fraud).
Vital interest	To prevent or suppress a danger to a person's life, body or health.
Your consent	To collect, use or disclose your Personal Data if your consent is required.

2.2. The purposes for which we collect your Personal Data

We may collect, use, disclose and transfer your Personal Data collected for various purposes, depending on how you interact with us, what benefits you obtain from us, nature of our relationship with you and our Business Partner and/or any other considerations in each specific context, as described below.

Kindly note that all the purposes as listed below set out the general framework of our data usage practices and only the relevant purposes will be applicable to you.

Purposes	Description
Selection and Recruitment processes	To proceed with recruitment process (e.g. recruitment, selection, or activities to promote our employer branding for recruitment and hiring, making hiring decisions, or checking reference in case of re-hiring and transfer between ADLC and subsidiaries); to process employment applications, interview, evaluate your application, eligibility, qualifications and performance; to conduct background checks and screening or to conduct professional license check whether you will be offered a position with us; to check your information against blacklist; to approve your application for the employment, to contact you in relation to the position you requested or applied for (e.g. whether your application is approved or rejected).
Identity verification	To conduct your identity and signatory verification when you apply for our contract of employment/work relationship or when we provide you with benefits; to authenticate your access and login credentials; to verify your location to allow access to your accounts.

Purposes	Description
Employment and onboarding processes until joining ADLC	To process onboarding, execute employment contracts, specify employment details, arrange for orientation and provide employment certifications; work equipment preparation, referral program and various reports ; to communicate and disseminate information to you; to contact with you and your emergency contact; to apply for work permits and visas; to administer leaves in compliance with our work rules; to conduct organizational development activities; to provide opportunities and activities for learning and development, scholarships, training ; to arrange examinations and handle the application and renewal processes for licenses and professional certificates; personality and leadership assessment, individual development plan including various skills and strengths, references, and reporting ; to provide access cards and credentials; to provide business card and rubber stamp; to provide reference and recommendation; to evaluate your performance through performance reports; to disclose performance evaluation information; to manage on probation, promotion, secondment and staff rotation, talent and succession program, activities related to employee engagement and organizational culture , opinions and experiences, human resources development through both domestic and international personnel exchange programs, production of public relations materials used for internal and external dissemination, employee relations activities, charitable and public benefit activities, and disciplinary investigations, and etc.

Purposes	Description
Provision of compensation, salary, wages, severance pay and interests, including other benefits	To manage, analyze and plan payroll, to generate salary figures, net income amount, to issue certificates, statements of provident fund, employee welfare fund, incentives, and rewards; to deduct compulsory and voluntary taxation and contributions; to process the registration/termination of social security fund members; to process insurance claims (including life, disability, accident, health, and travel insurance) ; to check the related parties transactions for loan approval; to enable employees to apply for and obtain benefits such as loans, accommodation allowance, annual health check- up, medical treatment, disaster benefit, child birth gift, and child's scholarships; to register you as a member in Cremation Association and various health care and other benefits for you.
Transactions and/or payments processes	To transfer funds, process payments, transactions, and fulfill orders; to conduct underwriting and loan approval, disbursement, collateral registration, settlement, reconciliation, repayment and closure activities for loans offered to you; to carry out debt collection and enforcement services, and deal with your account in a manner that is most appropriate to your individual circumstances for loans offered to you.

Purposes	Description
Internal organization management and relationship maintenance	To conduct data analysis, report and other data maintenance related activities; to provide facilities, tools and equipment; to follow up on complaints, claims, and survey; to update and maintain your data and related records; to maintain data accuracy and completeness; to provide IT systems and support, such as to provide access to our IT tools, systems and applications, learning management system, and online training courses provided by ADLC to you.
Post-employment processes	To process on off-boarding, to process post-employment services, certifications, cessation/ termination of employment, exit interviews and ad hoc surveys; and transfer to new position in our affiliates.
Protection of our interests	To protect the security and integrity of our business; to exercise our rights or protect our interest where it is necessary and lawfully to do so; for example, to detect and prevent fraud, to respond to fraud claims, and to determine fraud risk and identify fraudulent transactions, intellectual property infringement claims, or violations of law; to manage and prevent loss of our assets and property; to perform sanction list checking, risk management, internal audits and records, asset management, systems, and other business controls; to prevent or suppress a danger to a person's life, body, or health; to secure the compliance of our terms and conditions; to follow up on incidents; to prevent and report criminal offences and to protect the security and integrity of our business; for reference and evidence related to claims or litigation.

Purposes	Description
Carrying out legal obligations and compliance	To fulfill legal obligations, legal proceedings, or government authorities' orders which may include orders from government authorities outside Thailand, and/or cooperate with court, regulators, government authorities, and law enforcement bodies when we reasonably believe that we are legally required to do so, and when disclosing your personal data is strictly necessary to fulfill the said legal obligations, proceedings, government orders, our and our affiliates' codes of conduct and internal policies; to exercise our rights or defend against legal claims; to maintain record keeping and resolve complaints and disputes; to perform compliance activities, internal and external audits, credit reporting, regulatory and tax reporting and Gift and Entertainment (G&E) reporting.
Security and system monitoring	To authenticate and control access and logs where applicable; to monitor systems, devices and Internet connection; ensuring IT security; to prevent and solve crimes; and undertake risk management and fraud prevention.
Corporate transactions	In the event of sale, transfer, merger, reorganization, or similar event, to disclose and transfer your Personal Data to one or more third parties as part of that transaction.

2.3 Sensitive data

We will only collect, use, or disclose sensitive data on the basis of your explicit consent, for establishment, defense, compliance or exercise of legal claims, fulfillment of legal obligations for significant public interests, or otherwise as permitted by law. Where consent is required, we will separately ask for your consent via the appropriate methods.

Sensitive categories of Personal Data	Purposes
Criminal records	To collect and record your criminal records for recruitment and hiring consideration or reviewing your qualifications, prohibited characteristics screening as required by relevant laws or notifications ; to conduct criminal records and background checks in relation to you in the process of nominations and appointments of director, manager, management or executive, and to disclose the results of such checks to the relevant regulators to support consideration of approval for the appointment as well as fact-findings. The retention period for criminal records shall be in accordance with the announcement of the Personal Data Protection Committee.

Sensitive categories of Personal Data	Purposes
Health data	We may collect and use your health data for selection and recruitment, execution of contract, management of leave record, payroll and benefits, training and development, scholarship awarding, human resources development through both domestic and international personnel exchange programs, other benefits as well as analysis for product and service development, and for the selection of persons to participate in any activities organized by us. Your health data we collect about you may include medical record number, health plan beneficiary number, device identifiers and serial numbers, medical treatment, medical diagnosis, medical history, information related to medical payment, medical claims data, medical images and metadata, Rx / prescription number, health insurance identification or account number, drugs, therapies, or medical products or equipment used, physical health data, mental health data, genetic test results or information, family health, morbidity history and annual physical check-up result.
Biometric Information	We may collect information about your face image data for using in Face Scan

3. Who we disclose your Personal Data to

We may disclose your Personal Data to the following parties for the purposes as described in section 2 above, depending on the context of your relationship with us and the nature services you obtain from us:

Category of recipients	Descriptions
Affiliates	We may disclose your Personal Data to other members of Krungsri Group, including our financial group companies and our affiliates or companies in which Krungsri holds shares and MUFG Bank, Ltd. and its affiliates which are located in Thailand and other countries, including but not limited to Japan, Singapore, the United States of America and the United Kingdom.
Service providers	We may engage other companies to provide services for us and to support us in our employment contract/ compensation management (including but not limited to studying, conducting data analysis, and designing rewards and benefits programs to be competitive in the market) , benefit management, payment of salary, wage and benefits, training and development including the preparation of all relevant reports, scholarship awarding, licensing and certification/ competency assessment, examination arrangement and personality and leadership assessment including various skills, strengths and individual development plan , employee engagement activities, engagement, organizational culture and experience survey ,work relationship operation, and health care benefits. We may disclose your Personal Data to these service providers, or they may collect your Personal Data on our behalf, for

Category of recipients	Descriptions
	various business purposes, including human resources services, for example, we engage and outsource some of our business functions to infrastructure, software, and website development and IT service providers; data storage/analysis and cloud service providers ; recruitment agencies and outsourced HR service providers; research agencies; domestic and international training and development service providers; examination arrangement and competency assessment service provider; personality and leadership assessment including various skills, strengths and individual development plan service provider; licensing and professional certification training service providers; travel and accommodation agencies; VISA agents; card manufacturing service providers; award/honor plate manufacturing service providers; payment service providers; payment networking service providers; research agencies, health care service providers, employee survey or engagement/experience survey service providers , organizational culture survey service providers, marketing agencies, email sending service providers; SMS sending service providers; social networking service companies; analytics service providers; administrative and business support service providers; document storage and destruction service providers; document delivery service providers; printing service providers; data entry service providers, tax service providers, visa/work permit service providers and electronic signature service provider, etc.

Category of recipients	Descriptions
Professional advisors	We may disclose your Personal Data to professional advisors relating to audit, legal, accounting, and tax services who assist in running our business and defending or bringing any legal claims, initiating and managing auction or taking legal actions.
Companies we partner with	We may disclose your Personal Data to companies that we have partnered with to offer or enhance our human resources services to you (e.g. hospitals, insurance companies and brokers, accommodation agents and hotels, and event organizers).
Association or institutions	We may disclose your Personal Data to associations or institutions such as Cremation Association, Thai Bankers' Association, the associations or institutions that oversee the licensing and professional certification, etc.
Third parties with whom you authorize or direct us to share your Personal Data	We may disclose your Personal Data with your consent or at your direction.
Third parties such as assignees, transferees, or novates	We may assign, transfer, or novate our rights or obligations to a third party, to the extent permitted under an agreement between you and us. We may disclose or transfer your Personal Data to assignees, transferees, or novatees, including prospective assignees, transferees, or novatees,

Category of recipients	Descriptions
Third parties connected with corporate transactions	We may disclose or transfer your Personal Data to our business partners, investors, significant shareholders, assignees, prospective assignees, transferees, or prospective transferees in the event of any reorganization, debt restructuring, merger, acquisition, sale, purchase, joint venture, assignment, dissolution or any similar event involving the transfer or other disposal of all or any portion of our business, assets, or stock.
Government entities and others with whom we disclose Personal Data for legal or necessary purposes	We may disclose your Personal Data to government entities or regulatory bodies (e.g. the Bank of Thailand, the Office of Securities and Exchange Commission, the Office of Insurance Commission, the Thai Financial Market Committee (TFMC), the Land Department, Ministry of Labour, the Royal Thai Police, the Revenue Department, the Legal Execution Department, and courts), the Immigration Office, the Social Security Office, the Workmen's Compensation Fund, Employee Welfare Fund, the Student Loan Fund, Department of Skill Development, public or private agencies involved in assigning/ recruiting you to work both in Thailand and abroad and others for legal, regulatory and other necessary purposes. This includes responding to requests from regulators or government authorities for purposes of law enforcement, legal orders, audits, or legal processes/claims.
Other categories of data recipients	Companies, financial institutions, educational institutions with whom we have not partnered who seek your personal information from us for reference where you have given your consent or based on other legal basis.

4. Transfer of your Personal Data to other countries (if any)

We may need to disclose or transfer your Personal Data to third party located overseas, e.g. Japan, Australia, Singapore, the United States of America, and the United Kingdom, and submit or transfer your Personal Data to MUFG Bank, Ltd. and its subsidiaries and its parent company, i.e. Mitsubishi UFJ Financial Group, as well as the companies in which we hold shares, our group companies, or entities authorized by us, outsourcing service providers, agents, subcontractors, financial asset exchange platforms, regulators and relevant agencies of other countries, for achieving our business purposes or for your benefits, e.g. secondment and staff rotation to other overseas entities, training, testing, engagement and organizational culture survey, opinion and employee experience survey, personality and leadership assessment including various skills, strengths and individual development plan , talent program and succession management. We may also need to store your Personal Data in servers located outside Thailand including Cloud platform. Some recipients of your Personal Data are located in the country which has not yet been designated as having adequate data protection standard by the Personal Data Protection Committee under the Thai Personal Data Protection Act B.E. 2562.

When it is necessary for us to transfer your Personal Data to a third country with a level of data protection standards not equivalent to Thailand, we will ensure that an adequate degree of protection is afforded to the transferred Personal Data, or the transfer is otherwise permitted in accordance with the applicable data protection law. We may, for example, obtain contractual assurances from any third party given access to the transferred Personal Data that such data will be protected by data protection standards which are equivalent to those required in Thailand.

5. How long we will store your personal information

We will store your Personal Data for as long as it is necessary for the purposes for which it was collected, as explained in this Notice and in accordance with the applicable data protection law. However, we may retain your Personal Data for a longer period in order to comply with applicable laws and regulations and our internal policy or with regard to our operational requirements, such as proper account maintenance, facilitating customer relationship management, and responding to legal claims or regulatory requests.

6. Your rights

Subject to the applicable data protection laws in Thailand, you may have a number of rights regarding the collection, use, disclosure and/or transfer of your Personal Data, including:

- (1) **to access:** you can access and obtain a copy of information relating to the collection, use, disclosure and/or transfer of your personal data, and a copy of your personal data, or request that we disclose the acquisition of your personal data without your consent;
- (2) **to rectify:** where you consider that your personal data is inaccurate, not up-to-date, or incomplete, you can require that such Personal Data be modified accordingly;
- (3) **to erase or destroy:** you can request the deletion, destruction, or anonymization of your personal data to the extent permitted by law;
- (4) **to restrict:** you can request the restriction of the use of your personal data, for example in the case you found that your personal data is inaccurate, you can request to restrict the use of such data until it is modified;
- (5) **to object:** You have the right to object to the collection, use, or disclosure of your personal data including for direct marketing purposes in any case, which covers profiling related to such direct marketing;

- (6) **to withdraw your consent:** where you have given your consent for the collection, use, or disclosure of personal data, you have the right to withdraw your consent at any time;
- (7) **to data portability:** where legally applicable, you have the right to request us to provide your personal data in a structure, commonly used and machine-readable format using tools or devices which function automatically and by which personal data can be used and disclosed in automatic mode; and transmit or transfer your personal data in such format to another organization; and
- (8) **to lodge complaints in case you notice that we do not comply with the data protection laws:** you are entitled to lodge a complaint with the competent authority regarding the collection, use, and/or disclosure of your personal data by us or on our behalf. Before approaching the competent authority, we would, however, appreciate the chance to deal with your concerns, so please contact us in the first instance.

To exercise any of these rights in this section, you may contact us at the address in "Contact us" section.

Your request for exercising any of the above rights may be limited by the applicable laws. There may be certain cases where we can reasonably and lawfully decline your request, for example, due to our legal obligation or court order.

7. Contact us

If you have any questions, comments, or concerns about our privacy practices or, if you would like to submit a request based on a right listed in this Notice, please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Contact our Data Protection Officer:

Name-Surname : [Ms. Manaphat Trisopakul](#)

Contact email : manaphat@krungsrileasing.com

Telephone number : [0-2208-2282](tel:0-2208-2282) ext 54251

Contact us:

Address : Ayudhya Development Leasing Company Limited (Head office)

Krungsri Ploenchit Tower 14th Floor 550 Ploenchit Road, Lumpini,

Pathumwan, Bangkok 10330 Thailand

Contact e-mail : dpo-adlc@krungsrileasing.com

Telephone number : [0-2208-2300](tel:0-2208-2300)