

PRIVACY NOTICE OF DEUTSCHE BANK AG, BANGKOK BRANCH

1. Why are you receiving this notice?

You are receiving this notice because you are either a private/wealth management client, authorized representative, ultimate beneficial owner, guarantor, beneficiary or individual business contract (all referred to below as “**you**”).

This notice provides an overview of what personal data we collect about you and how we use it. This notice also outlines your rights under the Personal Data Protection Act B.E. 2562 (2019) (“**PDPA**”). We want you to understand how and why we collect, use, disclose or otherwise process your personal data.

Personal Data means any information relating to a person, which enables the identification of that person, whether directly or indirectly.

Where we use “**we**,” “**us**” and “**our**” in this Notice, we are referring to Deutsche Bank AG Bangkok Branch.

When you provide personal data to us, we act as a “data controller.” It means:

- (i) we “control” the personal data you have provided, including making sure it is kept secure; and
- (ii) we make certain decisions on how to use and protect your personal data – but only to the extent that we have informed you about the use or are otherwise permitted by law.

2. What personal data do we collect about you?

The types of personal data we collect may include but are not limited to:

- (i) Name, contact details (such as address, telephone/mobile number and email address), specimen signature;
- (ii) Employer (e.g. client representative data or signatory) and employment history;
- (iii) Information relating to our business relationship and relevant services, including data derived from your usage of our IT platforms (including electronic communications), mobile apps, recorded telephone lines, office building access, and from your engagement with our marketing activities;
- (iv) KYC (know your customer) information, such as passport details, social security number, tax identification number, national ID, driver’s license, date and place of birth, domicile, tax status, source of wealth,

- rationale for use of corporate structures, relationships and affiliations, including those with public officials, and criminal record;
- (v) Financial information, such as credit worthiness, bank account details, income, pension, investments, assets, liabilities, outgoings, investment objectives, activity, experience or strategy, risk tolerance and transaction history; and
 - (vi) Other information, such as internet protocol address, cookie identification.

3. Are you under an obligation to provide us with your personal data?

You are not required by law to provide us with your personal data. However, if you refuse to do so we may be unable to conduct further business with you. For example, in order to satisfy our anti-money laundering obligations, we have to identify our clients, among other matters. This inevitably requires us to collect certain personal data from prospective clients.

4. Where do we obtain your personal data?

We will only hold data about you that is relevant in the context of business relationship that we have with you. Some of this information we will obtain directly from you, for example:

- (i) From the forms and associated documentation that you completed when you opened an account with us or signed an agreement with us, or both;
- (ii) When you provide or provided it to us in correspondence or conversations; and
- (iii) When you have made or make transactions with respect to your account.

We also obtain personal data from a range of other sources, which may include:

- (i) Your employer;
- (ii) Other Deutsche Bank Group entities, other companies and financial institutions;
- (iii) Publicly available sources (e.g., the press, registers of companies or assets, internet websites, including social media platforms);
- (iv) From providers of business-risk screening services, such as credit reference agencies, anti-fraud databases, sanctions list and databases of news articles;
- (v) Tax authorities, including those that are based outside of Thailand, if you are subject to tax in another jurisdiction; and
- (vi) Governmental and relevant regulatory authorities to whom we have regulatory obligations.

5. Why do we process your personal data and does the law allow this?

The purposes for which we process (i.e., use, store, disclose or transfer) your personal data are summarized below, together with the specific grounds under the PDPA that allow us to do this:

- **For the performance of a contract**

It may be necessary for us to process your personal data in order to perform a contract with you relating to our banking and financial services business, or to take steps at your request prior to entering into a contract. For further details, please refer to your contractual documentation.

- **For compliance with a legal obligation or acting in the public interest**

As a bank, we, including our parent company Deutsche Bank AG and the entities within the Deutsche Bank Group, are subject to a number of statutory and regulatory obligations that require us to collect, store or disclose personal data. This includes:

- compliance with anti-money laundering requirements, counter-terrorism financing laws, and sanctions laws
- response to investigations or disclosure orders from the police, regulators of Deutsche Bank Group entities, and tax or other public authorities (including outside of Thailand)

- **For the purposes of legitimate interests**

Where necessary, we process your personal data to fulfill our legitimate interests or those of a third party. (The law permits this only insofar as such interests are not outweighed by a greater need to protect your privacy.) Cases where we rely on our legitimate interests to process your personal data include (but are not limited to):

- Know-your-customer and creditworthiness checks
- Client and vendor relationship management
- Business analysis and development of products and services
- Activities relating to information security and building security, including use of CCTV recording
- Recording of telephone lines and monitoring of electronic communications for business and compliance purposes
- Prevention and detection of financial crimes
- Evaluating, bringing or defending legal claims

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- Marketing of Deutsche Bank Group products (unless you have objected/unsubscribed)
- Audits
- Business restructurings

- **On the basis of your consent**

If we wish to process your personal data in a way not covered by the legal justifications above, we would need your consent. Where you give consent, you are entitled to withdraw it at any time. Note that withdrawing your consent does not render our prior handling of your personal data unlawful, and that it might impact on our ability to continue providing our services in the same way in the future.

6. Who might we share your personal data with?

When necessary to fulfill your instructions to us and for the other purposes outlined above, we may share information about you with a range of recipients, including (but not limited to) the following:

- Credit reference agencies
- Background screening providers
- Financial institutions
- Funds
- Payment recipients
- Payment and settlement infrastructure providers
- Exchanges
- Regulators, courts, public authorities (including tax authorities)
- Deutsche Bank Group entities and service providers
- Auditors
- Insurers
- Potential purchasers of our business (or any area/unit)

These recipients could be located outside of Thailand.

7. Will we share your personal data to other countries?

Deutsche Bank and its clients are active globally. Thus, information relating to you may, in line with the purposes described above, be transferred to countries outside of Thailand. If we use service providers in another country, we require them, through contractual undertaking, to apply the same level of protection as would be necessary under the PDPA. We undertake to comply with any requirements or conditions for cross-border transfer of personal data that the Personal Data Protection Committee may issue, and will update this section as may be necessary,

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either by an amendment of this Notice or through another means (e.g., posting on our website).

8. How long will we keep your data for?

In general terms, we retain your personal data as long as necessary for the purposes for which we obtained it (see Section 5 above). In making decisions about how long to retain data, we take account of the following:

- The termination date of the relevant contract or business relationship;
- Any retention period required by law, regulation or internal policy; and
- Any need to preserve records beyond the above period in order to deal with actual or potential audits, tax matters or legal claims.

9. Will we use your personal data for marketing purposes?

We may use your personal data to give you information about products and services offered by us or our Deutsche Bank Group affiliates that we think you may be interested in receiving. Where we consider it appropriate, and insofar as compliant with applicable marketing laws, we may contact you in this regard by email or telephone. We refer to your right to object to marketing activity in the next section.

10. What data protection rights do you have?

Subject to certain exceptions and limitations, by law you have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and request information about personal data we obtained without your consent;
- **Request us to transfer** personal data you gave to another company in a commonly used machine-readable format (also known as “data portability”);
- **Object to processing** of your personal data. This enables you to object to processing of your personal data that is carried out :
 - o For direct marketing
 - o Under circumstances where collection of personal data without consent was exempted under the law
 - o For scientific, historical or statistical research

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If you lodge an objection on the first ground, we will simply stop processing your personal data for marketing purposes. In the two other cases (second and third grounds), we will stop processing the relevant data unless we identify compelling legitimate grounds for the processing that override your rights and interests or else we need to process the data in connection with a legal claim or the processing is justified by reasons of public interest;

- **Request erasure** of your personal data. This enables you to ask us to delete your personal data where there is no legal ground for us to continue processing it;
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data, such as during the period of time it might take us to respond to your claim that the data is inaccurate or where the retention period has ended but you request further retention for establishing or defending a legal claim;
- **Request correction** of the personal data we hold about you. This enables you to have incomplete, inaccurate or misleading data we hold about you to be corrected;
- **Withdraw your consent** to the processing of your personal data. See Section 5 above; and
- **File a complaint** with the Personal Data Protection Committee (or any data privacy authority that may be created by the Thai government) for any violation by us of the PDPA.

11. Changes to this privacy notice

We may update this privacy notice from time to time in order to clarify it or address changes in law or our business operations. We will notify you if we make any substantial updates and you can always access the current version at the following Deutsche Bank website address:

https://www.db.com/thailand/en/content/legal_resources.html

We may also notify you in other ways about the processing of your personal data, such as in specific product documentation.

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12. Data Protection Officer/Contact Person

Should you have any queries or complaints about the way in which we process your personal data, you may raise these with your usual Deutsche Bank Bangkok contact or else with our internal Data Protection Officer at:

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Athenee Tower, Levels 28-29
63 Wireless Road, Lumpini, Pathumwan
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As of January 2021.