



## (Privacy Notice)

Creave (the "Website") recognizes the importance of complying with the Personal Data Protection Act of 2019, which is relevant to the collection, use, disclosure, and any other processing of personal data.

Creave (the "Website") is committed to the privacy and protection of personal data of its customers and users (referred to as "you"). Therefore, the company has implemented a Privacy Policy to inform you about its practices regarding the collection, use, and disclosure of personal data. This enables you to use the electronic financial services provided through applications, web portals, or any other channels offered by the company, such as payment services, electronic money transfers, and other services authorized by the Bank of Thailand, both currently available and potentially introduced in the future. This includes, but is not limited to, any services related to the use of applications, websites, and any channels provided by the company (referred to as the "Services") with confidence.

To ensure transparency, the company has prepared this Privacy Notice to inform you of the details regarding the collection, use, and disclosure of your personal data as follows:

1. Individuals from whom the company collects personal data
  - (1) As Creave provides services to corporate customers, the company primarily collects data related to the corporate customers of the company, such as authorized signatories, primary contacts, power of attorney holders, employees, and any other individuals that the corporate customers disclose information to the company.
  - (2) This includes shareholders of the company, board members, executives, as well as consultants of the company.
  - (3) The company may also collect personal data from individuals who have established a relationship with the company, including ordinary individuals who provide information to the company.

In any case, the company ensures that it complies with all applicable data protection laws and regulations when collecting, using, and disclosing personal data.



## 2. Definitions

"Website" refers to Creative

"You" refers to natural persons who are data subjects, such as customers, service users, beneficiaries, partners, or contractual parties of the company.

"Personal Data" means any information relating to an identified or identifiable individual, whether directly or indirectly, but excluding information regarding deceased persons. This includes, but is not limited to, name, surname, identification card number, address, telephone number, financial information, and indirectly identifiable information.

"Cookies" refer to small pieces of data stored on your device that enable the website to remember information about your access to and usage of the website each time.

"Data Recipients" refer to individuals appointed by the company to process personal data for the purpose of improving efficiency, developing, enhancing, offering products and services, or for the benefit of the company's business operations.

"Sensitive Data" refers to personal data concerning race, ethnicity, political opinions, beliefs, religion or philosophy, sexual behavior, criminal records, health information, disabilities, trade union membership, genetic data, biometric data, or any other data of a similar sensitive nature that may affect the data subject in the same way.

## 3. Types of Personal Data Collected, Used, or Disclosed by the Company

- Data from identification documents such as national identification cards, passports, and/or other documents issued by the government, including identification numbers, names, surnames, and titles.

- Contact information necessary for communication, such as address, mobile phone numbers, and email addresses.

- Data related to employment.

- Financial status-related data, such as transaction records made through electronic wallets or other services, and deposit account information.



- Data related to devices, system operations, and user behavior, including but not limited to identification numbers used for device identification on networks (e.g., IP address, MAC address, Device ID), advertisement ID connected to mobile devices, network data, connectivity data, operating system details of mobile devices, mobile network service provider, location information, device usage details, cookies, phonebook data, application usage data, technical data, device models, and types.

Additionally, for additional services beyond the company's basic services or in cases where the collection, use, or disclosure of sensitive personal data is required, the company will only proceed in compliance with the applicable laws. The company will notify the purpose and types of personal data to be collected, used, or disclosed before or at the time of such actions.

#### 4. Purpose of collecting, gathering, using, and processing personal data:

- To enable the company to develop and/or procure products and services that are suitable and meet your needs.

- To use for the purpose of considering the provision of services according to the terms of the company's products or the relevant terms related to the services provided by the company, and/or to make changes to personal data as requested by you and to use and process the data for the benefit and reference in providing various services as desired by you.

- Please note that, with your explicit consent, the company may collect personal data from reliable sources and may also require sensitive personal data as necessary to be used for the purpose of considering the approval of relevant contracts, agreements, and other services provided by the company.

- To use for the purpose of assessing, managing risks, and/or insuring the company, in accordance with the criteria and methods as prescribed by the relevant supervisory authorities.

- To facilitate convenient payment of service fees or other expenses as stated in the invoices and/or by financial service providers that have a contractual relationship with the company, upon your request through employees, agents, sales representatives, intermediaries, and through the company's applications or portals.

- To manage the debts and obligations that the company has towards you or that you have towards the company, and to collect, gather, and demand payment for any debts that you have towards the company from you or any other individuals who have provided guarantees or agreements for your liability.



- To use for any purposes related to claims or any claims made by or against you, or any other matters related to you in terms of services and/or products provided by the company without limitations on the use of such information for the purpose of considering disputes, analyzing, investigating, initiating, evaluating, responding to, resolving, or reaching agreements in relation to such claims or disputes.

- To use for the purpose of considering entering into contracts or participating as business partners or business alliances, such as sales agents, intermediaries, business cooperation agreements, conducting sales promotion activities, including any necessary processes for the implementation of such agreements.

- To ensure the provision of services with convenience, efficiency, compliance with laws, criteria, and regulations, including performing legal duties and regulations related to the use of computers, personal data protection laws, or any other applicable laws, both currently and in the future.

- To communicate between the company and you through telephone, text messages (SMS), email, or postal services, or through any channels for document delivery, inquiries, or notifications, or to verify and confirm information related to your accounts, or to conduct surveys or provide other information related to the services."

#### Regarding the Company's Necessity

- For benefits related to the Company's business operations, collaborations, partnerships, or business associates working with the Company, or relevant target businesses, including educational, research, statistical analysis, service development, marketing, advertising, news dissemination, events, promotions, and providing appropriate advice on products and services in line with your interests.

Please note that when you communicate with the Company or its team, the Company may record audio or details of the communication through any means. When the Company notifies you and you continue to contact the Company or its team, it is considered that you are aware of and consent to the recording of audio and/or details of the communication.

In cases where the Company needs to collect, use, or disclose your personal data differently from what is stated in this personal data protection policy, the Company will inform you of the nature of such collection, use, or disclosure of your personal data before or during the collection process.

Your use of the services will be deemed as your acknowledgment and acceptance of this



## 5. personal data protection policy

### Data Collection Methods and Use

The Company will collect personal data from you only when clear consent is obtained from you, either in writing or electronically, including data collection through various technological means such as cookies.

#### 5.1 Data Provided by You to the Company

The Company will collect personal data that you provide to the Company, such as data submitted for various service applications provided by the Company, requests for entering into contracts with the Company, and participation data in activities, whether through websites, applications, portals, surveys, user account information, or data that has been modified or updated, or data received from customers, employees, representatives, agents, business partners, contract parties, or data received from other user accounts that indicate that the users or contract parties are data owners, including but not limited to all types of data collected or previously collected. This includes customer history, such as name, address, date of birth, gender, age, photographs, email, bank account numbers, credit card numbers, identification card numbers, passport numbers, taxpayer identification numbers, phone numbers, etc."

#### 5.2 Customer or Partner Service Data Received

The company collects information regarding the use of its services and the nature of your usage. This includes but is not limited to data about the devices you use to access the website, computer traffic data (logs), communication and interaction data with other users, and data from usage records. Examples of such data include device identifiers, IP addresses, device serial numbers, device types, mobile network data, connection data, geographic location data, browser types, transaction log data, customer behavior, website access statistics, access times, search queries, usage of website functions, and data collected through cookies or similar technologies. Please note that the above details are examples of the information the company may collect. The company will collect personal data that is necessary and for a duration necessary to fulfill contractual obligations regarding products or services or to comply with the law, as applicable.



Please be aware that if the company is required to collect personal data due to legal requirements or obligations under agreements you have with the company, and you are unable to provide the necessary data to the company, the company may not be able to fulfill its duties or contractual obligations. In such cases, the company may need to cancel the provision of services or permissions related to the relevant products or services to customers or partners. However, if such actions are necessary, the company will inform customers or partners in advance of the impact.

### 5.3 Accessing and Updating Personal Data

- If customers or partners do not wish to receive data and promotional information from the company, they can notify the company through various channels specified by the company.
- If you wish the company to suspend the use, delete, supplement, update, or correct your personal data to be complete and accurate according to the current data, you can notify the company of your request in writing through various channels specified by the company.
- Please note that if you request the company to delete your personal data from the company's system, it may affect the company's ability to provide services as stipulated by the criteria set for other products or services, or it may result in reduced efficiency of the services you receive from the company.

### 6. Basis for the collection, use, or disclosure of your personal data and purposes of processing:

The company will collect, use, or disclose your personal data based on the following legal bases and for the purposes of processing:

Necessity for the performance of a contract in which you are a party or to take steps at your request prior to entering into a contract, including but not limited to:

- Evaluating registration requests for app or web portal usage.
- Providing the best possible services from the company.
- Offering assistance, responding to inquiries, receiving feedback, providing information updates, or addressing service-related queries through the company's communication



channels as notified by you. The company reserves the right, as permitted by law and related to the services provided, to carry out these activities.

- Developing and improving service quality, enhancing service efficiency, and facilitating convenience for your service access.
- Processing data to provide services.
- Any other activities related to service provision and beneficial to you.

Legal obligations, including but not limited to:

- Complying with laws applicable to the company, which the company is obligated to adhere to, such as regulations, rules, principles, or guidelines issued by legal authorities or regulatory bodies, such as the announcements of the Bank of Thailand, the Anti-Money Laundering Act, etc. The company may disclose your personal data to internal/external auditors, government agencies, or other legal entities as required.

Consent, including but not limited to:

- Analyzing or predicting your preferences or behaviors, including research, development, product improvement, and marketing planning purposes, allowing the company or affiliated companies within the group to present products, services, promotional offers, and suggestions suitable for you.
- Any other purposes in compliance with the law, for which the company will seek your consent from time to time, such as facilitating convenience for you to request services from other service providers through the application.

Legitimate interests, except when overridden by fundamental rights and freedoms concerning your personal data. These interests include, but are not limited to:

- Preventing crimes and fraud.
- Maintaining system and network security to comply with international standards.
- Protecting against fraud and ensuring the security of customer e-wallet accounts.

Base of Important Public Interests with Appropriate Measures for Protecting Fundamental Rights and Benefits:



- Verification/Authentication of Identity to Prevent Crime and Fraud

- The company has implemented suitable measures to verify and authenticate your identity in order to prevent criminal activities and fraudulent actions. Suspicions regarding Financial Support for Acts of Violence or Money Laundering. The company has taken necessary precautions to address any suspicions related to providing financial support for acts of violence or money laundering.

In addition to the legal bases and aforementioned objectives, the company may collect, use, or disclose personal information under other legal bases. For instance, this may be done to protect or prevent harm to your life, body, or health, or to fulfill public interest objectives such as compiling historical records or official correspondence for public benefit. If there are any actions taken to collect, use, or disclose personal information under such other objectives, the company will notify you accordingly at a later time.

#### 7. Disclosure of Personal Data to Third Parties and Collection of Personal Data from External Sources:

In order to fulfill the objectives and within the scope permitted by the laws of the aforementioned company, the company may collect, use, transmit, process, and disclose personal data to the following individuals or entities:

- Legal entities under the control of or controlled by the company, including companies within the same group as IPayment Solutions Limited.

- Legal entities or any other individuals with contractual or legal relationships with the company, including external service providers, cloud service providers, or any other business partners, both within and outside the country. The company will ensure that these service providers handle personal data in compliance with applicable data protection policies and laws.

- Auditors, external auditors of the company, government agencies, transferees of rights, and any other individuals or legal entities to whom the company is required to disclose personal data for legal compliance.

- Business transferees in the event of mergers, acquisitions, sale of assets, or all or part of the business.





## 8. Retention Period of Personal Data:

The company will retain your personal data for as long as necessary during your use of the services or your relationship with the company, or for the duration necessary to achieve the relevant objectives of the company's services. The company may also retain personal data after the termination of the relationship if required by law, such as for anti-money laundering purposes or for the purpose of proving or investigating disputes within the statutory limitation period, which shall not exceed 10 years from the termination of the relationship. The company will delete or anonymize personal data when it is no longer necessary or at the end of the aforementioned retention period, making it impossible to identify individuals.

## 9. Rights under the personal data protection law

As you are owner of personal data in accordance with the Personal Data Protection Law You have the legal right to do the following:

### 1. Right to withdraw your consent

You have the right to withdraw your consent for the processing of your personal data that you have previously provided to the company. This right can be exercised as long as your personal data is in the possession of the company.

### 2. Right to access and obtain copies of your personal data

You have the right to request access to your personal data held by the company or request copies of such data in a readable and usable format, either by automated means or by tools or devices that work automatically (if technically feasible). You may also request the company to send or transfer such personal data to another data controller as required by law or to receive the personal data that the company sends or transfers to another data controller (unless technically impossible).

### 3. Right to request correction of inaccurate personal data



You have the right to request the company to correct any inaccurate or incomplete personal data that you have provided to the company, as long as your personal data is in the possession of the company.

4. Right to request erasure, destruction, or anonymization of personal data

You have the right to request the company to delete, destroy, or anonymize your personal data in a form that cannot identify you as the data subject. This right can be exercised for certain reasons as specified by law.

5. Right to request suspension of the use of personal data

You have the right to request the company to suspend the use of your personal data held by the company for certain reasons as specified by law.

6. Right to object to the processing of personal data

You have the right to object to the company's processing of your personal data for certain reasons as specified by law.

7. Right to lodge a complaint in case of non-compliance

You have the right to lodge a complaint with the Personal Data Protection Commission in case the company or its employees or contractors violate or fail to comply with the personal data protection law.

You may contact the company's Data Protection Officer through the Customer Service Center of Wireless Operation and Payments Co., Ltd. at 02 096 9145 to submit a request for the company to exercise the above-mentioned rights. The company will process your request within the timeframe specified by the personal data protection law and will inform you of the impact that will result from the processing of your request. However, the company reserves the right to refuse to comply with your request in cases where it is legally mandated. Additionally, the company may charge a reasonable fee for processing your request based on the administrative and internal policy expenses incurred.



## 10. Security measures

The company acknowledges and recognizes the importance of your personal data and has enhanced and developed a system to ensure the security of your personal data in compliance with the law and up-to-date international standards at all times. The company will make every effort to comply with this Personal Data Protection Policy and emphasize the importance of data security to its employees, including data processors who have access to or are responsible for personal data in accordance with the law, to safeguard and respect the security of your personal data.

In the event that the company identifies a personal data breach, the company will report such incident to the Office of the Personal Data Protection Commission within 72 hours from the time the breach is known, unless the breach is unlikely to result in a risk to your rights and freedoms. However, if the breach poses a high risk to your rights and freedoms, the company will notify you of the breach and provide you with remedial measures within 72 hours from the time the breach is known.

The company's website or information system components may contain links to external websites, products, and services. If you agree to link to these websites, products, and services, the respective providers may collect certain information, such as information about your use of their services. The company cannot be held responsible for the security or privacy of any data collected by these external websites, products, and services. You should exercise caution and review the privacy policies of these third-party individuals or organizations.

In the event that it is necessary or required for the company to transfer any of your personal data to another country, the company will comply with the standards specified by the data protection laws and will not transfer your personal data to a destination country that does not have sufficient data protection standards unless you provide consent for the company to transfer your personal data to such destination country. However, in the event that the personal data of a user is compromised due to computer-related offenses, such as hacking, theft, copying, or destruction of databases, password mining, or any other method that is not the fault of the company, the company reserves the right to disclaim any liability arising from such actions.



## 11. Language

The translation of this privacy statement into any language is provided solely for your convenience. It is not intended to modify the privacy statement in any way. In the event of any discrepancies between the Thai version and any other non-Thai language versions, the Thai version shall prevail.

### Updates to the Privacy Statement:

By using any services of the company, you acknowledge acceptance of this privacy statement. The company may modify or supplement this privacy statement at any time and will notify you accordingly. Your continued use of the application, portal, or any services after the announcement of such modifications or supplements will be deemed as acceptance of each respective modification or supplement.

## 12. Policy Updates

Furthermore, the use of any services provided by the company is considered as acceptance of this personal data protection policy. The company may modify or supplement this personal data protection policy at any time and will notify you accordingly. Your continued use of the application or any services after the announcement of such modifications or supplements will be deemed as acceptance of each respective modification or supplement.

## 13. Contact

If you have any questions, complaints, requests for access, or any concerns related to this privacy statement, and/or if you wish to verify the personal data that you have provided to the company and that is under the company's possession, you may contact the company using the following details.

Creative

Address : WIRELESS OPERATION AND PAYMENT CO., LTD.  
26/55 Chan Space office building, 1st. Floor, Room 5A  
Nang Linchi Road, Thung Maha Mek Sub-district, Sathorn District, Bangkok 10120



Tel.

Email :