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# DATA PROTECTION NOTICE

[WWW.AURA.CO.TH](http://WWW.AURA.CO.TH)

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1) Who is responsible for your personal data and whom can you contact?

We process information and personal data relating to you and/or any Related Person of yours [Related Person(s) and you together hereafter the “Data Subject(s)”]. We essentially do so in connection with our existing and/or prospective business relationships, including your use of our websites (together hereafter the “Business Relationship”). We can do so either as controller or as joint controller (hereafter the “Controller”).

A “Related Person” means an individual or entity whose information you or a third party provides to us and/or which otherwise comes to our knowledge in connection with our Business Relationship. A Related Person may include, but is not limited to: (i) a director, officer or employee of a company; (ii) a trustee, settlor or protector of a trust; (iii) a nominee or beneficial owner of an account; (iv) a substantial interest owner in an account; (v) a controlling person; (vi) a payee of a designated payment; (vii) a representative or agent (i.e. with a power of attorney or a right to information on an account); or (viii) an employer or contractor. In this regard, we ask you to liaise with any and all of your Related Persons and transmit to them this Privacy Notice and the information contained therein.

Should you have any questions about this Privacy Notice, your Controller or, more generally, the processing of your (or your Related Persons’) personal data, you can contact your

relationship manager or our Data Protection Officer at addresses :  
info@aura.co.th

## 2) How do we handle your personal data?

We are subject to certain confidentiality and/or secrecy obligations, e.g. arising under data protection, contract, professional or banking secrecy, as the case may be. Personal data we process are also subject to said obligations.

This Privacy Notice deals with the way we process (i.e. collect, use, store, transmit or otherwise handle or process, operations collectively defined hereafter as the “Processing” or “Processing Operations”) personal data. This Privacy Notice does not replace, and is subject, to our applicable contractual terms and conditions.

We may conduct our Processing Operations either directly or indirectly, through other parties that process personal data on our behalf (hereafter the “Processors”). We are responsible only for the Processing of personal data as per this Privacy Notice.

## 3) What personal data do we process?

“Personal data” include any information that makes it possible to identify a natural person directly (e.g. first name, surname) or indirectly (e.g. passport number or data combination).

Personal data of Data Subjects we process may include:

- identification data, e.g. names, addresses, telephone numbers, email addresses, business contact information;
- personal characteristics, e.g. date of birth, country of birth;

- professional information, e.g. employment and job history, title, professional skills, powers of attorney;
- identifiers issued by public bodies, e.g. passport, identification card, tax identification number, national insurance number, social security number, work permit;
- financial information, e.g. financial and credit history information, bank details, record from the debt collection enforcement office;
- transaction/investment data, e.g. current and past investments, investment profile, investment preferences and invested amount, number and value of shares held, role in a transaction (seller/acquirer of shares), transaction details;
- management and security data, e.g. records of presence on our premises, reputation checks and background checks;
- cookie information, e.g. cookies and similar technologies on websites and in emails (please also see our Cookie Policy).

4) For what Purposes and on what legal bases do we process personal data?

We collect and process personal data for the purposes (hereafter the “Purposes”) and based on the legal bases set out in this Privacy Notice.

As a general comment, we essentially base our Processing on: (i) performance of a contract to which you are a party or a Related Person is related (as well as to take pre-contractual steps at your or a Related Person’s request); (ii) our duty to comply with a legal or regulatory obligation; (iii) the pursuit of our legitimate interest (including that of other Aura Solution Company Limited / entities);

and (iv) performance of a task carried out in the public interest (e.g. to prevent or detect offence).

More specifically, we collect and process personal data as necessary for performance of a contract to which you are a party and/or a Related Person is related, which encompasses the following Processing Operations (which may also be based on other lawful bases):

- the opening and management of your and/or Related Person's account or Business Relationship with us, including all related operations for your identification;
- any other related services provided by any service provider of the Controller(s) and Processors in connection with our Business Relationship;
- management, administration and distribution of investment funds, including any ancillary services related to these activities, or the processing of subscription, conversion and redemption requests in investment funds, as well as for maintaining the ongoing relationship with respect to holdings in such investment funds;
- management of requests for proposals and/or due diligence, the provision of services (including the invoicing and payment of fees) and management of the Business Relationship and related communication with you.

We also collect and process personal data in connection with compliance with legal and regulatory obligations to which we are subject, including to:

- provide offering documentation to Data Subjects about products and services

- comply with legal obligations relating to accounting, compliance with legislation on markets in financial instruments, outsourcing, foreign activity and qualified participation;
- carry out any other form of cooperation with, or reporting to, competent administrations, supervising authorities, law enforcement authorities and other public authorities [e.g. in the field of anti-money laundering and combating terrorism financing (AML-CTF)], for prevention and detection of crime under tax law [e.g. reporting of name, address, date of birth, tax identification number (TIN), account number and account balance to tax authorities under the Common Reporting Standard (CRS) or Foreign Account Tax Compliance Act (FATCA) or other tax legislation to prevent tax evasion and fraud as applicable];
- prevent fraud, bribery, corruption and the provision of financial and other services to persons subject to economic or trade sanctions on an ongoing basis in accordance with our AML-CTF procedures, as well as to retain AML-CTF and other required records for screening purposes;
- deal with active intra-group risk management pursuant to which risks in terms of markets, credit, default, processes, liquidity and image as well as operational and legal risks must be identified, limited and monitored;
- record conversations with Data Subjects (such as telephone and electronic communications), in particular to document instructions or detect potential or actual frauds and other offences.

The Processing Operations outlined above may rely on other lawful bases and potentially do substantially rely on the performance of a task carried out in the public interest.

Furthermore, we may process personal data in connection with legitimate interests we pursue in order to:

- assess certain characteristics of the Data Subjects on the basis of personal data processed automatically (profiling) (see also Section 5 below);
- develop our Business Relationship with you;
- improve our internal business organisation and operations, including for risk management;
- use this information in Aura Group entities for market studies or advertising purposes, unless Data Subjects have objected to use of their personal data for marketing;
- assess our risk and take related business decisions with regard to risk management;
- communicate personal data to other Aura Group entities, in particular to guarantee an efficient and harmonised service and inform Data Subjects about services offered by Aura entities;
- establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings;
- record conversations with Data Subjects (such as telephone and electronic communications) to verify instructions, enforce or defend our interests or rights, assess, analyse and improve the quality of our services, train our employees and manage risks.
- conduct audits and/or regularly reviews on you or your Related Person.

To the extent one or more of our Processes of personal data presupposes that you give your prior consent thereto, we will contact you and seek your consent in due time.



The provision of personal data may be mandatory, e.g. with regard to our compliance with legal and regulatory obligations to which we are subject. Please be aware that failing to provide such information may preclude us from pursuing a Business Relationship with, and/or from rendering our services to, you.

5) Do we rely on profiling or automated decision-making?

We may assess certain characteristics of the Data Subjects on the basis of personal data processed automatically (profiling) in particular to provide Data Subjects with personalised offers and advice or information on our products and services or those of our affiliates and business partners. We may also use technologies that allow us to identify the level of risks linked to a Data Subject or to activity on an account.

Furthermore, we generally do not use automated decision-making in connection with our Business Relationship and/or Data Subjects. Should we do so, we will comply with applicable legal and regulatory requirements.

6) What sources do we use to collect your personal data?

To achieve the Purposes, we collect or receive personal data:

- directly from the Data Subjects, e.g. when contacting us or through (pre ) contractual documentation sent directly to us; and/or
- indirectly from other external sources, including any publicly available sources [e.g. UN or EU sanctions lists, OFAC – Specially Designated Nationals (SND) lists], information available through subscription services (e.g. Bloomberg, World Compliance PEP list) or information provided by other third parties.



## 7) Do we share your personal data with third parties?

If necessary or useful to achieve the Purposes, we reserve the right to disclose or make accessible the personal data to the following recipients, provided this is legally or otherwise authorised or required:

- public/governmental administrations, courts, competent authorities (e.g. financial supervisory authorities) or financial market actors (e.g. third-party or central depositories, brokers, exchanges and registers);
- Aura Group entities or third-party Processors that process personal data on our behalf and/or to which we outsource certain tasks of ours (outsourcing);
- auditors or legal advisors.

We undertake not to transfer personal data to any third parties other than those listed above, except as disclosed to Data Subjects from time to time or if required by applicable laws and regulations applicable to them or by any order from a court, governmental, supervisory or regulatory body, including tax authorities

## 8) Are personal data transferred outside our jurisdiction of incorporation?

In the course of our Business Relationship, we may disclose, transfer and/or store personal data abroad (hereafter “International Transfer”): (i) in connection with the conclusion or performance of contracts directly or indirectly related to our Business Relationship, e.g. a contract with you or with third parties in your interest; (ii) when the communication is necessary to safeguard an overriding public interest; or (iii) in exceptional cases

duly foreseen by applicable laws (e.g. disclosures of certain trades made on an exchange to international trade registers).

International Transfers may include the transfer to jurisdictions that: (i) ensure an adequate level of data protection for the rights and freedoms of Data Subjects as regards to Processing; (ii) benefit from adequacy decisions as regards their level of data protection (e.g. adequacy decisions from the European Commission or the Thailand Federal Data Protection and Information Commissioner); or (iii) do not benefit from such adequacy decisions and do not offer an adequate level of data protection. In the latter case, we will ensure that appropriate safeguards are provided, e.g. by using standard contractual data protection clauses established by the European Commission.

Should you wish to have further information as regards International Transfers or appropriate safeguards, you can of course contact our Data Protection Officer (see Section 1 above).

## 9) What are your rights in connection with data protection?

You have the right, subject to applicable local data protection legislation, to:

- request access to, and receive a copy of, the personal data we hold;
- if appropriate, request rectification or erasure of the personal data that are inaccurate;
- request that personal data be erased when the Processing is no longer necessary for the Purposes, or is not or no longer lawful for other reasons, subject however to applicable retention periods (see Section 10 below);
- request a restriction of Processing of personal data where the accuracy of the personal data is contested, the

Processing is unlawful, or if the Data Subjects have objected to the Processing;

- object to the Processing of personal data, in which case we will no longer process the personal data unless we have compelling legitimate grounds to do so (e.g. the establishment, exercise or defence of legal claims);
- receive the personal data in structured, commonly used and machine-readable format (data portability right);
- obtain a copy of, or access to, the appropriate or suitable safeguards which we may have implemented for transferring the personal data outside the European Union or Switzerland;
- complain to our Data Protection Officer (see Section 1 above) in relation to the Processing of personal data and, failing any satisfactory resolution of the matter, file a complaint in relation to the Processing of personal data with the relevant data protection supervisory authority.

Even if a Data Subject objects to the Processing of personal data, we are nevertheless allowed to continue the same if the Processing is: (i) legally mandatory; (ii) necessary for performance of a contract to which the Data Subject is a party; (iii) necessary for performance of a task carried out in the public interest; or (iv) necessary for the purposes of the legitimate interests we pursue, including the establishment, exercise or defence of legal claims. We will not, however, use the Data Subject's personal data for direct marketing purposes if the Data Subject asks us not to do so.

Subject to the limitations set forth in this Privacy Notice and/or in applicable local data protection laws, you can exercise the above rights free of charge by contacting our Data Protection Officer

10) How long are your personal data kept or stored?

As a matter of principle, we retain personal data for as long as we need the same to achieve the Purposes. By the same token, we will delete or anonymise personal data (or equivalent) once they are no longer necessary to achieve the Purposes, subject however: (i) to any applicable legal or regulatory requirements to store personal data for a longer period; or (ii) to establishing, exercising and/or defending actual or potential legal claims, investigations or similar proceedings, including legal holds, which we may enforce to preserve relevant information.

Optimise your data assets. Make faster and better decisions. Work more efficiently and save money. Find new sources of revenue. Capitalise on the untapped business intelligence you already own.

Imagine having advanced business analytics that give you the ability to see and predict everything, everywhere. Every interaction with customers. Every moving part in your supply chain. Every financial transaction, anywhere in the world.

Imagine a data architecture that lets you process all that information instantly, to improve customer insights, build products faster, or spot fraud.

Now imagine using predictive analytics that give you the ability to react to events before they happen. To stop customer churn. Prevent accidents. Predict the impact of medical treatments. And imagine if analytics could help you to drive business innovation and open up totally new revenue streams to create products and offers you haven't even dreamed of yet.

## SUPERPOWER

The good news is, data is an asset you already own. We'll help you to analyse your current state, develop a strong data foundation, and then monetise that data and harness the power of

the information you hold to optimise business performance and commercialise data opportunities.

## TRUSTED DATA

You're using your data to drive business innovation, so there's no room for error. Data quality begins with solid data governance. It has to be well-organised, relevant, accurate, and understandable. We'll help create your data framework, build the strategy, optimise your infrastructure, processes and systems, and create the culture to become a data-driven organisation.

### **Do what you do today. Even better.**

Every area in every business - from supply chain efficiency, to overall technology innovation - can be improved through smart use of data and analytics.

For more than a century, we've been helping clients solve the important business challenges they face. Today, we do it all with the power of data analytics. Combined with huge proprietary data sets and our own analytics platforms, we use our experience in analytics services and consulting to help you work more efficiently and effectively.

Want better business performance through better business innovation? Our specialists can help you apply data based insights to pinpoint opportunities in your industry to work smarter, focus and prioritise.

## SUPPLY CHAIN EFFECTIVENESS

Four key questions are often on the minds of any supply chain leader:

- How can I quickly tell how my supply chain is performing?
- How can I manage my supply chain in real time?
- What does my optimal supply chain look like?
- How can I find and put in place improvements?

We combined years of supply chain insight with new analytics capabilities to create the Supply Chain Opportunity and Optimisation Platform (SCOOP), a new tool to help answer these questions. We built it to:

- Support diagnostics of current performance, using analytics and our own supply chain benchmarking services.
- Transform supply chains by defining and predicting the potential impact of future designs.
- Manage in real time, using data from connected devices, machines and assets.

## **CUSTOMER ANALYTICS**

You have more access to more data about your customers than ever before. But how can it help you?

We can help you get greater insight through listening to social media conversations, taking advantage of mobile devices as sensing platforms, and mining the details from CRM systems. By

understanding how your customers behave, you can do things like:

- Make better decisions about how to serve them.
- Optimise your pricing models.
- Improve product adoption in new and existing markets.

Together, we'll use analytics to gain meaning from various sources of customer data.

## **OPERATIONAL EFFICIENCY**

Two thirds of businesses plan to cut costs over the next 12 months. But less than 30% of programmes hit their targets. And less than a fifth demonstrate sustained benefits over three years.

We work with clients to take cost out of their businesses - and make it sustainable, without hurting customer experience or the ability to innovate and grow.

We can help you:

- Use data to find the potential to tighten up processes, reduce errors, and cut external spending.
- Use analytics to highlight patterns that show wasteful or inefficient processes.
- Make change stick, by delivering data and performance measures to the right people at the right time - and set up the incentives for people to act on it.



## **FINANCE EFFECTIVENESS**

Finance functions are transforming, improving business results by investing in commercial insight, spending less time on transactional work and running at lower costs. The best performers spend 20% more time on analysis (rather than data gathering) and run at 36% lower cost.

Data and analytics is fuelling this change. Advances through the cloud, artificial intelligence and robotic process automation, if properly applied, can free up time for finance to create and deliver value across the organisation.

## **PEOPLE MANAGEMENT**

**Businesses already know vast amounts about their people - and the potential is there to know even more. This gives them enormous untapped potential to generate meaningful insights.**

People analytics is changing the way companies think about everything from attracting and developing talent, to employee engagement and retaining.

We offer a broad range of services, from benchmarking to advanced analytics to comprehensive workforce surveying. All backed up by unique proprietary data sets. We'll help you take the guesswork out of your most important workforce decisions.

## **RISK & COMPLIANCE ANALYTICS**

Compliance teams tell us that implementing and tracking regulatory changes are the two greatest challenges they expect to face this year. But they also say they lack confidence in the

metrics they track - and don't have access to key data to help manage risks.

41% of executives tell us that their systems can't process large volumes of data from different sources. This can mean that too much data overwhelms internal controls - which creates operational, financial, and reputational risks.

With pressure on regulators and management to identify new risks earlier and take more effective action, our teams can help:

- Improve data management, and create detailed audit trails, more efficient case management, and more accurate reporting.
- Identify operational efficiencies, cut manual testing, and find potential cost-savings.
- Create dashboards, monitor operations and give and real-time insight.
- Reduce the risk of fines and sanctions - and protect against reputational damage.

## **FORENSIC INVESTIGATE ANALYTICS**

In a crisis, data can be crucial. Businesses might be investigated for anti-corruption violations. Or need defend themselves in international disputes. Or respond when regulators ask them to look back at years of transactions.

We're ready to help. Our global network of investigations teams use advanced analytics to identify, collect and analyse vast

amounts of data. The technology and procedures we use are defensible in court. And, because we work with lawyers and regulators around the world, we can anticipate the kinds of things they'll be looking for.

We'll help find the answers you need, in a way that's easy to understand. So you have clarity and confidence.

## **DEALS ANALYTICS**

As you make deals, you'll want to be confident that your decisions will create lasting value. But how do you turn data into deals intelligence?

We'll help you uncover the story behind the data. We bring together the latest technology and analytics approaches, all linked to a global network of teams with in-depth local and industry-specific deals experience.

We work with clients when they're embarking new deals opportunities, crunching numbers for a potential sale, anticipating the roadblocks ahead, or looking to strengthen their portfolios through acquisitions. We help them make informed decisions through smarter analytics.

## **BENCHMARKING**

Get a deeper understanding of your industry. And gain insight with data-driven performance metrics.

We can use analytics to help you gain insights on how you measure up against your peers. That means looking at key performance metrics across areas like operational and process excellence, product innovation, and workforce planning.

By applying analytics technologies, tools and techniques, we can help you turn dry facts and figures into strategic insights that solve complex business problems.

### Anti-Money Laundering Compliance

Regulators around the world continue to place a high importance on anti-money laundering compliance enforcement. Our broad experience in all aspects of anti-money laundering compliance ensures that our clients will meet those regulatory requirements.

Our team advises on:

- Evaluating practices, mandates and strategies for compliance with legal requirements and industry standards
- Developing, implementing and reviewing anti-laundering compliance programs, trainings and policies
- Anti-money laundering reporting obligations
- Conducting internal investigations with a focus on anti-money laundering compliance
- Representing clients in proceedings before supervisory authorities (e.g. FINMA) and courts

### Sanctions Compliance

Sanctions are a complex and shifting mix of legal, economic, political and international ties. We assist clients in complying with sanctions effectively by:

- Advising on the legal and regulatory ramifications of violating sanctions frameworks
- Drafting internal sanctions compliance guidelines and procedures
- Developing sanctions compliance related programs and trainings for our clients
- Representing clients in interactions with SECO and other regulators and in courts

Our goal is to help our clients in reducing their exposure to such events through effective compliance advice.

### Anti-Bribery and Corruption Compliance

Our experienced team has handled many bribery and corruption cases. From immediate crisis management to internal investigation, interfacing and negotiating with authorities, and defending you against enforcement actions, we can provide clear, principled, and knowledgeable assistance to you at each level of a bribery and corruption scenario.

We advise on:

- Developing and implementing anti-bribery and corruption frameworks for our clients
- Providing anti-corruption compliance training to employees
- Conducting internal investigations and taking further actions

Our team will provide the expertise, advocacy, and inventive thinking required to defend your business, whether you are dealing with an existing bribery and corruption issue or wanting to prevent problems in the future.

## Competition Compliance

Many multinational companies reach out to us for competition compliance advice. Through our expertise in competition, we have been mandated to provide competition compliance training for many Swiss and international companies. Our clients rely on us to provide high-standing cutting-edge, but still pragmatic advice on a variety of competition compliance matters, including compliance trainings.

Our advisory service includes:

- Developing policies, compliance programs and trainings for our clients
- Supporting our clients in re-evaluating and reviewing existing business models, policies and programs.
- Negotiating and drafting contracts between competitors, e.g. cooperation agreements, purchasing associations, joint ventures, and between undertakings at different market levels, e.g. distribution agreements and supply agreements

We can work on any competition compliance matter our clients face. We understand the regulators' goals and priorities, which allows us to accomplish favorable outcomes.

## CONTACTS

Thank you for your interest in Aura Solution Company Limited.

Aura HQ

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