

Privacy Policy

DATA POLICY

AURA.CO.TH



Data Privacy Policy for Electronic Services

General

Aura Solution Company Limited and its subsidiaries (“Aura”, “we”, or “us”) welcome you to our website, mobile applications, and other services provided via electronic means (collectively referred to as “Electronic Services”) and appreciate your interest in our products and services.

For most of the Electronic Services hereunder, Bank Solution Company Limited in Phuket, Thailand is the data controller. In other cases, where explicitly mentioned, the respective Aura subsidiary acts as the data controller. For more information about Aura’s representative in the European Union, please visit : www.aura.co.th

Aura prioritizes appropriate data protection. This page explains how we handle your personal data in connection with your use of our Electronic Services (“Privacy Policy”).

By continuing to use the Aura Electronic Services, you confirm that you are 18 years of age or older. Please note that we may amend this Privacy Policy from time to time. The applicable version is always the current one, as referenced above (last updated).

For information on how the Aura Group processes and protects the personal data of former, current, and prospective clients, you can find the respective Privacy Notices for Clients please visit : www.aura.co.th

Purpose and Scope of the Privacy Policy

Protecting your privacy and treating the personal data of all users of our Electronic Services in accordance with the law is important to us. We understand that by using our Electronic Services, you may be entrusting us with your personal data (“Data”), and we assure you that we take our duty to protect and safeguard this Data very seriously. This Privacy Policy explains the kind of data we process when using our Electronic Services, the purpose for which we process it, how we process it, whom we may disclose it to, and the security measures we have put in place to protect it.

This Privacy Policy applies to all Data we obtain through your use of our Electronic Services. It does not apply to data we obtain through other channels or to Electronic Services of third parties (“third-party Electronic Services”), even if you access them via a link in our Electronic Services or if they are necessary for the operation of our Electronic Services. We have no influence on the content or privacy policy of third-party Electronic Services and therefore cannot assume any responsibility for them.

Types of Data Being Processed

When you use our Electronic Services, details of your usage may be automatically registered by our backend systems (such as your IP address, browser, HTTP-header user agent, device-specific information, the content you accessed, including time and date of access, usage and user interaction, and the redirecting website from which you came to our Electronic Services). We also process Data such as your name, address, e-mail address, phone number, date of birth, gender, and other Data transmitted to us if you register for the use of our Electronic Services or if you complete a registration form or comment field for a newsletter, product demos, etc.

Legal Grounds and Purpose of Data Processing

We process the Data based on the following legal grounds:

- Legitimate interests of Aura or of third parties;
- Your consent (insofar as the processing is based on a specific request for consent, e.g., the receipt of newsletters for which you have registered);
- Fulfilment of contractual obligations and steps prior to entering into a contract;
- Statutory requirements.

We process the Data for the following purposes:

- Providing Electronic Services (e.g., to assist with your registrations, user settings, and respond to your feedback and issues);
- Administration, research, and development in connection with Electronic Services;
- Marketing and advertising measures (e.g., newsletters via e-mail, online advertising);
- Analysis and monitoring of usage, user behavior, and navigation while using the Electronic Services;
- Checking the identity and suitability of clients for certain products and services;

- Establishing a basis for future information on the products and services offered by Aura and to improve their quality;
- Safeguarding Aura's IT security and IT operations;
- Enabling the employment application processes according to the data processing and protection declaration for candidates, to which you consent prior to completing the application process;
- Compliance and risk management, prevention and investigation of criminal acts, assertion of legal claims, and defense in legal disputes.

We process all your Data in accordance with the applicable laws on data protection and for as long as required.

Disclosure and Transfer of Your Data

We may transmit Data within the Aura Group between Group companies, to Aura agents or service providers, business partners, or foreign courts, agencies, or authorities in or outside the country where you are currently located for the purposes stated above. All the above persons and entities that receive Data must ensure compliance with applicable data protection laws as well as the data protection standards of Aura.

Aura may transfer your Data to countries outside Phuket, Thailand:

- For providing Electronic Services;
- If you have given your consent (e.g., in your agreements with Aura or via privacy settings); or
- If based on a statutory requirement, authority request, or similar processes as required by applicable law.

In most cases, your Data may be transferred to countries in which the Aura Group is represented. You will find a corresponding overview at www.aura.co.th. Your data may also be transferred to countries in which the Aura Group is not represented (e.g., for providing Electronic Services). Yet, Aura Group might transfer your Data worldwide to make use of third-party providers in other countries including EU/EEA member states and other countries with an adequate level of data protection as specified by Phuket, Thailand and the EU Commission, or other jurisdictions around the world. The specific countries where the recipients of your Data are located may vary as they correspond with the applicable purpose(s) defined in this policy. Recipients of Data may potentially forward the information to their branches or group entities, service providers, or authorities within and/or outside of their jurisdiction. We may also transfer Data based on the exception of your consent, the determination,

assertion, or enforcement of legal claims, or to protect the physical integrity of a data subject.

Individual countries to which Aura transfers your Data may potentially not have laws that afford the same degree of protection to personal data as in Phuket, Thailand, or the EU. In these cases, Aura will generally ensure an adequate level of data protection, for example by concluding data transfer agreements with the recipients of your Data in these countries. These include agreements that have been approved by the European Commission and the Swiss Federal Data Protection and Information Commissioner (FDPIC), known as standard contractual clauses. You can request an example of a data transfer agreement usually utilized by Aura by contacting the Data Protection Advisor (“DPA”; see contact details below).

By way of exception, your Data may also be transferred to countries without an adequate level of data protection in other cases, e.g., based on your consent, in connection with legal proceedings abroad, or if the transfer is required in order to conclude or execute a contract.

In accordance with applicable legal and regulatory obligations, Aura may be required to disclose Data to supervisory authorities, judicial authorities, or other persons of authority.

Security Measures of Aura

Aura takes appropriate technical and organizational security measures to ensure that your Data processed within the IT environment controlled by Aura is protected against unauthorized access, misuse, loss, and/or destruction.

Aura takes both physical and electronic process-specific security measures, including firewalls, personal passwords, and encryption and authentication technologies. Our employees and approved service providers are bound to applicable confidentiality and data protection obligations.

Additionally, access to Data is made accessible to employees and third parties (e.g., service providers) on a strict “need-to-know” basis.

Data Retention

Aura will retain your Data for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by applicable law or based on regulatory requirements.

Transmission of Data via an Open Network

Aura draws your attention to the fact that if you use our Electronic Services via an open network, this may allow third parties (e.g., app stores, network providers, or the manufacturer of your device), wherever they are located, to access and process your Data. Open networks are beyond Aura's control and can therefore not be regarded as a secure environment. Any transmission of Data via such an open network cannot be guaranteed to be secure or error-free as Data may be intercepted, amended, corrupted, lost, destroyed, arrive late or incomplete, contain viruses, or may be monitored. In particular, Data sent via an open network may leave the country – even where both sender and recipient are in the same country – and may be transmitted to and potentially processed in countries where data protection requirements may be lower than in the country where you are currently located. Where Data is transmitted via an open network, we cannot be held responsible for the protection of this Data and we accept no responsibility or liability for the security of your Data during transmission. We, therefore, recommend avoiding the transmission of any confidential information via open networks. You may choose other means of communication with Aura, where you deem it appropriate.

Cookies

The Aura Electronic Services (excluding e-banking and mobile banking) use cookies for statistical purposes, as a tool for our web developers, and to improve the user experience. Cookies are small files stored on your electronic device to keep track of your visit to the Electronic Services and your preferences as you move between pages, and sometimes to save settings between visits. Cookies help Electronic Services gather statistics about how often people visit certain areas of the site and help in tailoring Electronic Services to be more useful and user-friendly. Please note that most web browsers accept cookies automatically. You can configure your browser to not save any or only certain cookies on your electronic device or to always display a warning before receiving a new cookie. Deactivating cookies can, however, prevent you from using certain functions on our Electronic Services.

We use the following three types of cookies:

- **Functional Cookies:** These cookies are required for the basic functions of this website. They make it easier for you to access content on this website. Among other things, we use these cookies to store your domicile and language settings. Functional cookies cannot be deactivated.

- **Analytics Cookies:** These cookies enable us to analyze and improve the preferences and user behavior on our website. This enables us to deliver a user experience based on your needs.
- **Marketing Cookies:** We use these cookies to display advertisements tailored to your interests, both inside and outside our website.

please visit : www.aura.co.th to let us know how we can use cookies. You can withdraw your consent at any time. These settings do not apply to Aura mobile applications.

Web Analysis Tools and Social Media Plugins

We use third-party analysis tools such as Google Analytics to monitor Electronic Services (excluding e-banking and mobile banking). This involves the use of cookies to help analyze how users use our Electronic Services. This usage data includes:

- Host name of the accessing electronic device (masked IP address);
- Type/version of browser used;
- Referrer URL (website from which visitors are redirected to the Aura Electronic Services by clicking a link);

- Date and time of server request;
- Device-specific information.

We may use social plug-ins, which can be recognized by their social network logos. please visit : www.aura.co.th to let us know how we can use cookies. You can withdraw your consent at any time. These settings do not apply to Aura mobile applications.

Links

The Aura Electronic Services may contain links to third-party Electronic Services that are not operated or monitored by us. Please be aware that such third-party Electronic Services are not bound by this Privacy Policy and that we are not responsible for their content or their principles regarding the handling of Data. We, therefore, recommend consulting and checking the individual privacy policies or terms of use of third-party Electronic Services.

Data Subject Rights

According to applicable data protection laws and regulations, you may have the right to request:

- Information on Data that we hold about you;

- Your Data in a generally usable, machine-readable, and standardized format (Data Portability);
- Rectification of your incorrect Data;
- Your Data to be deleted if Aura is not permitted or is not legally obliged to retain the Data;
- Restrict processing of your Data;
- Object to the processing of your Data.

Furthermore, you may have the right to lodge a complaint with a competent data privacy regulatory authority.

Contact

If you have questions about the processing of your Data, please contact us using the following contact details: Aura Solution Company Limited

75 Wichita Road

Phuket 83000

Thailand

www.aura.co.th

This Policy was last updated in August 2023.