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Data Privacy Policy

Data Protection Officer

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Value from Innovation

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1.0 Introduction

1.1 Purposes

To protect personal data effectively and provide effective remedial measures against personal data infringement for data subjects as follows:

- Proper procedures for personal data processing and management will be established.
- Personal information security role & responsibility shall be assigned.
- Employees shall be provided with the best environment, culture and support for personal data.
- All employees shall truly understand their responsibilities and the approach to handle personal data.
- Individuals wishing to submit a data access request must know how to submit the request, who to contact, and that contact must manage the request quickly and correctly.
- Individuals must ensure that their data is processed in accordance with the data protection principles. The data shall be secure at all times and may not be accessed by unauthorized persons.
- Other organizations that want to transfer data from the Company, or share data with the Company, must comply with the requirements.
- Any new systems being applied will be assessed for compliance with the policy in terms of personal data storage, risk, and data corruption.

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1.2 Scope

This policy establishes the extent to which it applies to all personal data. This includes sensitive information received, processed, stored, altered, disclosed, or deleted by the Company for its business operation in the form of electronic media, other document storage systems, and media containing the Company's data, as well as personal data belonging to external organizations that entrust the Company according to the agreement indicating the data protection requirements.

This data protection policy applies to all employees of the Company, either regular or temporary, and all contractors, consultants, and third-party users. Disciplinary action may be taken against employees who fail to comply with the policy. Failure to comply with the data protection laws may cause either the individuals or organizations to be penalized according to the law, including an order to stop collecting and processing such data.

1.3 Definitions

"Personal Data" refers to data about an individual which enables that individual to be identified either directly or indirectly, but it does not specifically include data on deceased persons.

"Data Controller" refers to the person or juristic person authorized to make decisions about the collection, use, or disclosure of personal data.

"Data Processor" refers to the person or juristic person who processes, collects, uses, or discloses personal data as directed by or on behalf of the Data Controller. However, the

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person or juristic person performing such action must not be the Data Controller.

2.0 Personal Data Protection Policy

2.1 Intentions of the Policy

- To clearly state the importance of implementing correct practices concerning personal data and agree with the principles related to data security.
- To emphasize the importance of data needs, specify the general condition, quantity, and characteristics of data deemed necessary for the organization's business operations.
- To draft general management policy and good practice.

2.2 Lawful, Fair, and Transparent Actions

The Company shall collect and use personal data to operate the business in order to respond to the customers' needs effectively. The Company is aware of keeping the data correctly and lawfully. Such data is essential for successful business operations, and building confidence and trust between the Company and customers. Personal data shall be collected and processed in accordance only with the business and legal requirements as necessary. Therefore, the Company shall only process personal data for lawful purposes that does not affect the interests of any individuals, and shall ensure that the data is as accurate as possible according to the data collection standard.

The Company processes personal data for the following lawful business purposes;

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- The data subject gives consent for use of the data as desired by the organization, but the conditions must be clearly specified.
- Processing is required for performance of a contract that the data subject is a contract party, and to take action as requested by the data subject prior to execution of the contract.
- Processing requires complying with all legal provisions or obligations when the Data Controller is the data subject.
- Processing is required in order to protect the material interests of the data subject.
- Processing is required for efficiency of the work carried out in the public interest.
- Processing is required for the lawful interests pursued by the Data Controller or a third party, except in cases where such interests are overridden by the fundamental rights and freedoms of the data subject who requests data protection, especially when the data subject is a minor.
- Individuals shall be aware that their data has been collected, either verbally, in writing, or through the Company’s policies directly. The data shall always be accurate and up to date and processed according to the rights of all individuals related to the personal data.
- Individuals whose data is in the Company's database have the right to choose whether or not to receive marketing information and communications.

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3.0 Statement of the Personal Data Protection Policy

The Personal Data Protection Act B.E. 2562 (2019) requires that companies are responsible for establishing personal data protection measures to prevent infringement, either intentionally or unintentionally. The Company is committed to prevent personal data from loss, misuse, disclosure, alteration, unavailability, unauthorized or unpermitted access, including destruction by implementing reasonable precautions to protect personal data, including creating appropriate technical measures to ensure proper protection of any personal data collected, used or disclosed, either directly or indirectly, whether in hardcopy or softcopy or on any other storage media and in compliance with the applicable legal provisions.

The Company shall collect, use, or disclose personal data related to various individuals, including the employees, temporary employees, and business partners. Any data collected and processed must be for lawful business purposes and bound to protect the rights and freedoms of the individuals as stipulated by the law as stated in this policy.

4.0 Personal Data Protection

- Consent must be obtained explicitly in writing or through an electronic system unless it cannot be obtained through such means.
- When obtaining the data subject's consent, the Data Controller must also indicate the purpose for collecting, using, or disclosing personal data, which must be clearly separate from other messages in an easily accessible and understandable format, including use of

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language that is easy to understand and does not deceive or mislead the data subject against the said purposes.

- When obtaining the data subject's consent, the Data Controller must give utmost consideration to the independence of the data subject giving such consent. However, there must be no conditions attached to giving consent to collect, use, or disclose personal data that is not necessary or relevant when entering into a contract including providing business services.
- The data subject may withdraw the consent at any time, and such consent must be as easily withdrawn as when given, unless the right to withdraw consent is limited by law or under a contract that benefits the data subject. However, withdrawal of consent shall not affect the collection, use, or disclosure of the personal data for which the data subject has given consent.
- In the event that a withdrawal of consent affects the data subject in any way, the Data Controller must inform the data subject of the consequences of withdrawing consent. Obtaining consent from the data subject that does not comply with this section shall not be binding upon the data subject and shall prevent the Data Controller from collecting, using, or disclosing such personal data.

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4.1 Collection of Personal Data

- Collection of personal data must be allowed by the data subject in advance unless permitted otherwise by the Personal Data Protection Act B.E. 2562, or other laws.
- Collection of personal data must be done clearly by obtaining the data subject's consent in writing or hardcopy or softcopy, or separately by other means in an easily accessible and understandable format.
- When collecting personal data from the data subjects who are minors under the legal age of marriage, or who do not have the same status as persons who have reached the age of majority according to Section 27 of the Civil and Commercial Code, the consent must be obtained from the persons with parental authority and who are authorized to act on behalf of such minors.
- When collecting personal data from incompetent persons, the consent must be obtained from the guardians who are authorized to act on behalf of such incompetent persons.
- When collecting personal data from quasi-incompetent persons, the consent must be obtained from the guardians who are authorized to act on behalf of such quasi-incompetent persons.
- Only the minimum necessary personal data may be collected, and the purpose of storage, usage or disclosure of such data must also be clearly indicated.
- The period for storage and collection of personal data must be stated.

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- The measures or methods for securing the collected personal data must be determined to prevent access by unauthorized persons.

4.2 Use and Disclosure of Personal Data

- The Company may use or disclose personal data only when the data subject's consent has been obtained in advance.
- When forwarding or transferring personal data to other entities, the Company shall take steps to provide adequate personal data protection measures to prevent loss, damage, or other errors that may occur to the personal data. Only data as permitted by the data subject shall be used or disclosed.

4.3 Personal Data Retention Period

- The period of storage of personal data is in accordance with the following table.

No	Type of personal data	Retention period
1	Employee	Throughout employment period and keep another 10 years after the termination of employment
2	Temporary staff	Throughout the period of working with the Company and keep another 10 years after the termination of employment.
3	Candidate	1 year in case of non-selection for

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		employment
4	Visitor	2 years since giving the personal data to the Company
5	Business partner	Throughout the contract period and keep another 7 years after expiration of contract
6	Customer	Throughout the contract period and keep another 7 years after expiration of contract
7	Others	Identify in Consent

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- The retention period of personal data will be clearly indicated in the process of obtaining consent from the personal data subject, which may be in the form of documents or electronic channels, etc.

- Consideration of the retention period of personal data will be determined by legal requirement, regulations, contractual agreement, procedures, and other related agreements. If not, the Company will keep personal data at least 2 years in accordance with the Company's Internal Standards.

- Customers and Business Partners who have a contract with the Company, such as Sales Contracts, Service Contracts, etc., may not submit consent documents because it is a lawful collection under Civil and Commercial Law.

4.4 Special Type of Personal Data

The special type of personal data (also known as "sensitive personal data") is personal data related to an individual's race or ethnicity, political opinions, religious beliefs, mental state, sexual orientation, biology, and details of committees or commissions accused of any wrongdoing and any court proceedings related to such wrongdoing.

The Company shall ensure to handle sensitive personal data with extreme caution. Before collecting or processing sensitive personal data, it must ensure that appropriate notification is given to the receiving party and that any required consent has been obtained.

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The Company shall process the special type of personal data when one or more of the following situations exist.

- The data subject has given explicit consent to process such data for one or more specified purposes. (Unless such is prohibited to do so by an EU member state or European Union law).
- Processing is required for the purpose of implementing the obligations and exercising the specific rights of the Data Controller or data subject regarding employment, social security, and social protection laws.
- Processing is required to protect the material interests of the data subject or of other natural persons for whom the data subject is physically or legally incapable of giving consent.
- Processing involves personal data made public by the data subject.
- Processing is required to proceed with legal claims or whenever courts are performing their judicial function.
- Processing is required for reasons of the public interest based on the relevant laws, to respect the essence of the right to data protection, and to provide appropriate and specific measures to protect the fundamental rights and interests concerning data.

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4.5 Risk Assessment and Personal Data Protection and Privacy

The Company shall assess the risks and protection of personal data and privacy through the Personal Data Protection Impact Assessment (DPIA) in order to ensure that any risks that may result in personal data infringement are considered and that appropriate measures exist covering the following topics.

- The types of personal data that may be collected, stored and processed.
- The purpose of using such personal data.
- The ways to use the personal data by various parties (internal and/or external).
- The necessity and method for data processing related to the purpose.
- The factors and risks related to the data.
- The measures established to reduce and manage any risks encountered.

The Personal Data Protection Impact Assessment (DPIA) requires regular evaluation and review of this process at least once a year, or in case there are changes related to business operations, operational processes, technology, or there are reports on incidents of a breach of personal data security that may be related.

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5.0 Personal Data Security Measures

5.1 Transfer of Personal Data and Communication

The Company must ensure that the following measures are taken in connection with communication and others related to the transfer of personal data.

- All emails containing personal data must be encrypted or password protected.
- Personal data must only be sent through secure networks and must not be permitted to send through unsecured networks under any circumstances.
- Personal data contained in email content is required to be kept to a minimum and, if possible, references should be made with other information, for example, using the user ID (such as payroll account number) rather than a name directly.
- In the case that it is necessary to send or transfer personal data abroad including to the same group companies or a business group for joint operations or business, the personal data protection shall be carried out under personal data security measures in compliance with the law and only subject to the data subject's consent.
- In the case that the personal data is required to be sent by fax, the recipient must be informed to standby in front of the fax machine before sending.

In the case of transferring personal data in hardcopy format, it must be sent directly to the recipient or, if using electronic storage media, secure electronic storage media must be used and indicated as "Secret" or "Confidential".

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5.2 Storage

The Company must ensure that the following secure measures are implemented concerning personal data storage.

- All softcopy of personal data shall be kept secure and protected by passwords and data encryption.
- Copies of all personal data together with any softcopies stored on removable electronic storage media shall be kept safely in a lockable box, cabinet, or drawer.
- All personal data stored electronically shall be backed up offsite and encrypted.
- Personal data must not be transferred or stored on any mobile device without strict protection, regardless of whether or not the device belongs to the Company, for example, the device itself must be encrypted.

5.3 Disposal

When any personal data is deleted or discarded for any reason (including copies no longer required), it shall be done in a secure manner.

Remark: Personal Information Destruction shall be complied with Document and Record Control (4104-061-D0009-02)

6.0 Information Technology System Security

The Company shall implement relevant measures in accordance with the Information Security

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Policy for authorized information technology services and communication facilities only. Any other actions or unauthorized actions, including using or sending personal or sensitive information to an unauthorized person that may damage the Company, shall also be considered as breaching this policy.

7.0 Policy Communication

This policy requires internal communication to all employees by issuing announcements/memos and appropriate storage on the intranet or website for external communication.

8.0 Notification of Infringement of Personal Data

The Company is responsible for reporting any infringement of personal data, either intentionally or unintentionally, to the supervisory authorities without delay, and in all cases within 72 hours after being notified of an incident or discovering a risk which is likely to result in a high risk to the rights and freedoms of individuals. In addition, the Company is obliged to notify the parties directly involved, and implement reasonable steps to protect all stored personal data.

The Company shall implement regular risk assessments and security measure improvement to prevent dangers that may arise from any security breach. The employees are responsible for reporting any existing or suspicious data infringement incidents to the Data Protection Officer of the Company for investigation within 24 hours.

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9.0 Raising Awareness

The employees and contractors are responsible for and shall be aware to comply with the requirements of this policy. The managers and supervisors are responsible for encouraging and raising awareness among all employees to comply with the policy that shall be communicated both internally and externally including to stakeholders extensively as necessary. All employees should be aware that a failure to comply with this policy shall require an investigation that may lead to the highest level of disciplinary action including termination of employment. A failure to comply with this policy that results in a violation of the privacy laws or that affects the Company may be subject to legal action. Raising this awareness must be set as an objective to be achieved on an annual basis.

10.0 Policy Monitoring, Review, and Improvement

This policy shall require monitoring and setting of indicators to measure the efficiency of the operational processes to be consistent with this policy. A plan must be established to measure the results on a regular basis and to review this policy at least once a year, or in the case of changes related to business operations, operational processes, technology, or incident reports about any

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breach of personal data security that may be related to this policy.