

**Global Power Synergy Public Company Limited's Announcement No. 011 /64**  
**Re: Privacy Policy (Revised Edition)**

Global Power Synergy Public Company Limited (“Company”, “we”, “us”, or “our”) are committed to protecting and respecting of your privacy under the Thai Personal Data Protection Act B.E. 2562, as amended from time to time, as well as other applicable laws and rules in Thailand (collectively “the PDPA”). We intend to protect the personal information about you that we collect, use, or disclose during the course of our business activities. We have the obligations as indicated in any laws regarding the protection of personal data, privacy, or data security that are applicable and effective in Thailand. This Policy is made as part of our efforts to fulfil the objectives of this Policy, and to comply with the PDPA.

### **Scope of this Policy**

This Policy explains our practice concerning privacy; our objectives for the collection, use, or disclosure of Personal Data; the types of Personal Data that we may collect, use, or disclose; our intended use of Personal Data; third parties to whom we may disclose Personal Data; the collection and retention of Personal Data; how you can access or request changes to your Personal Data that is held by us; and how you can complain if you think that we have violated the applicable law on personal data protection.

### **Definitions**

“**Personal Data**” means any information that relates, whether directly or indirectly, to an identified or identifiable person, or which can be used to distinguish or trace an individual's identity, whether by reference to such information alone, or when combined with other identifying information.

“**Sensitive Personal Data**” means any information as specified in Section 26 of the Thai Personal Data Protection Act, as amended from time to time, as well as other applicable laws and rules, such as information about race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal backgrounds, health information, disability, labor union information, genetic data, biometric data, or any other information that similarly affects the data subject.

“**Processing**” means the collection, use, or disclosure of Personal Data.

“**Personal Data Controller**” means any individual or legal entity authorized to make decisions concerning the collection, use, or disclosure of Personal Data.

“**Personal Data Processor**” means any individual or legal entity that processes the collection, use, or disclosure of Personal Data, in accordance with instructions, or on behalf, of the Controller. Any person who performs the Processing is not considered a Controller.

This Policy applies to any Personal Data that is collected from, and relates to, any of the following persons: employees; job applicants; former employees; the persons under the care of, or the relatives of, job applicants and/or employees, whose names are given to the Company by job applicants and/or employees; customers; suppliers; shareholders; company directors representatives of such mentioned persons; and any other persons whose Personal Data may be collected by us from time to time. In addition to hard copy documents, we may collect Personal Data from any of the websites or mobile applications made available by us, or from third-party channels through which you have provided your Personal Data.

This Policy does not form an integral part of any contract or agreement, unless it is expressly specified otherwise.

## 1. What type of information about you do we collect?

We collect only Personal Data that is reasonably necessary for our activities. Personal Data that we collect includes, but is not limited to, the following:

- Information about the following five groups of persons:
  - (1) **Employees and job applicants:** This group of persons include employees; job applicants; former employees; the persons under the care of, or the relatives of, job applicants and/or employees, whose names are given to the Company by job applicants and/or employees; representatives of employees; and any other involved persons whose Personal Data may be collected by us from time to time (collectively, “**Employees and Job Applicants**”);
  - (2) **Stakeholders:** This group of persons include shareholders and company directors;
  - (3) **Suppliers:** This group of persons include suppliers, subcontractors, vendors and service providers, business partners, and their agents
  - (4) **Customers:** This group of persons include agents or coordinators of any entities that the Company commercialize both previous and past commercial contract engagements or any other transactions of a similar nature,
  - (5) **Other Third Parties:** This group of persons includes sponsors, advertisers, community representatives, press, analyst and other representatives with whom the Company contacts.

The type of Personal Data that we may collect depends on the nature of the activities that you have with us and your locations, and the means which are used to collect the Personal Data, which may include the following information:

### **Employees and Job Applicants**

- Personally identifiable information, such as your name, address or contact details, gender, age, nationality, marital status, date of birth, and passport/ID Card number; identification information about your property, such as your car license number and bank account details; information about persons under your care; your travel information, such as your visa application, travel schedules, and flight information; Sensitive Personal Data, such as your religious belief, health-related data, criminal record, convictions or proceedings (or alleged offenses), or any other information of a similar nature, and biometric data, such as face scans and fingerprints;
- Educational background and work experience, such as your school/university certificates, academic records, academic or language test results, certificates, and reference letters;
- Basic information about your work, such as your work contact details, employee identification number, position, job description, line of supervision, working hours, and the terms and conditions of your employment agreement;
- Information about your employment, such as your resume, military service, information obtained during job interviews, and references;
- Information relating to your benefits and wage, such as information about the payment of your wage and benefits, your social security information, information about retirement and pensions, your provident fund information, tax information, your information about our Affiliate’s Employee Savings Cooperative, and information about third party beneficiaries;
- Information about your work efficacy, including work performance evaluation, the Company’s opinion about your work performance, feedback, information about work

rules or complaints, annual leave/sick leave/absence records, health-related data, information about physical checkups, and workplace and safety information, including information about inspection and risk assessments.

- Equality and diversity information (only if you give consent);
- Audio/ visual information about you, as an employee, if audio/ visual records are kept for disciplinary action purposes, or for use as evidence in an investigation;
- Legal and criminal records, as required by legal requirements, in specific circumstances.

### **Stakeholders**

- Personally identifiable information, such as your name, address or contact details, gender, age, nationality, marital status, date of birth, and passport/ID Card number;
- Financial status, such as your income, the source country of your income, your other sources of income, your sources of investment funds, the value of your personal property, your accounts, identification information about your property, such as your car license number, details relating to your bank accounts, bonds, certificates of deposit, bills of exchange, debentures, listed securities, and investment units, and your salary certificate;
- Educational background and work experience, such as your highest education level achieved, the institutions (and their countries) from which you obtained your education, the field(s) of your education, the year of your graduation, certificates, your finance-related educational background, your career, details about your work, the name of your company and the type of business, your position and department, the nature of your work, your responsibilities, the name of your secretary and his/her telephone number, your length of service to date, and your work experience;
- Legal offense record, such as records of anti-money laundering offenses; information about transaction suspension, involvement in any anti-money laundering scheme, or transaction rejections by any financial institution, if any; information about bankruptcy; information about any related legal entities; any information for the KYC process; information about occupations or businesses considered risky under anti-money laundering law; and information about offenses received from supervisory bodies;
- Information for investment assessment;
- Information about sales and purchase transaction and other transactions;
- Information about persons relating to a Stakeholder, such as his/her spouse, children, emergency contacts, his/her guarantor; persons who give consent on behalf of legal representatives, guardians, and/or estate administrators; parents and/or legal representatives; grantors of powers at all levels; and beneficiaries.

### **Suppliers**

- Personally identifiable information, such as your first name and surname, ID card number, passport number, telephone number, email address, postal address or other contact details, your birth date, nationality, occupation, photograph, biometric data, audio recordings and other information that required for risk assessment in pandemic situation;
- Health-related data and criminal records of any Representatives who provide services to us, and information about the sale or provision of services by you;
- Payment information, such as your bank account number, bank account details, billing information, credit or debit card information, such as your credit or debit card number, and the name of the cardholder (if any);

(Translation)

- In cases where you use any of our websites or mobile applications, technical information, the Company will collect the Personal Data such as the IP address and cookies, and, in the case of mobile applications, the Company will collect the Personal Data of your location and the mobile device used by you.

### **Customers**

- Personally identifiable information, such as your first name and surname, ID card number, passport number, telephone number, email address, postal address or other contact details, your birth date, nationality, occupation, photograph, biometric data, audio recordings and other information that required for risk assessment in pandemic situation;
- Payment information, such as your bank account number, bank account details, billing information, credit or debit card information, such as your credit or debit card number, and the name of the cardholder (if any);
- In cases where you use any of our websites or mobile applications, technical information, the Company will collect the Personal Data such as the IP address and cookies, and, in the case of mobile applications, the Company will collect the Personal Data of your location and the mobile device used by you.

### **Other Third Parties**

- Personally identifiable information, such as your first name and surname, ID card number, passport number, telephone number, email address, postal address or other contact details, your birth date, nationality, occupation, photograph, biometric data, audio recordings and other information that required for risk assessment in pandemic situation;
- Payment information, such as your bank account number, bank account details, billing information, credit or debit card information, such as your credit or debit card number, and the name of the cardholder (if any);
- In cases where you use any of our websites or mobile applications, technical information, the Company will collect the Personal Data such as the IP address and cookies, and, in the case of mobile applications, the Company will collect the Personal Data of your location and the mobile device used by you.

Any provision of your Personal Data is voluntary. You may choose not to give any information that is requested by the Company. However, the lack of such information may result in the Company's inability to provide you with certain products or services.

Some of the Personal Data collected by us may be considered "Sensitive Personal Data." We intend to collect Sensitive Personal Data only upon your express consent, except the cases that we collect such data under compliance of any applicable laws; and as reasonably necessary for our business operations, or as required by law, court orders, or orders of any government agencies, or in cases where you intentionally disclose such data to the public. We intend to share Sensitive Personal Data only when we deem that it is necessary to be collected, used, or processed for any of the following objectives:

- To prevent or suppress a danger to the life, body, or health of the data subject, when the data subject is incapable of giving the consent by whatever reason;
- To carry out legitimate activities, with appropriate safeguards, of foundations, associations, or any other not-for-profit bodies with political, religious, philosophical, or trade union purposes for their members;
- The information is disclosed to the public with your explicit consent;
- To establish, comply with, exercise, or defend legal claims;

- It is necessary for compliance with the law to achieve purposes relating to assess ability to work, to scientific, historical, or statistical research, or for other public interests

## **2. How do we collect your Personal Data?**

Generally, we collect your Personal Data directly from you, such as job application forms or any documents provided before becoming the Company's personnel, director, or executive; forms or systems for registration as our service provider or vendor; the Company's channels for receipt of information or its website; oral methods, such as by phone or through video/virtual conferences; emails or other communication channels; and through mobile applications which are made available by the Company or any related company.

We do not collect Personal Data from visitors of our website, except for Personal Data provided without solicitation and technical data, as described in this privacy policy.

In some circumstances, we may collect your Personal Data from another person, to whom you may or may not have direct connections. For example, we may collect your Personal Data from:

- Your employer, when your employer gives us your contact details;
- Recruitment companies, recruitment agencies, and recruitment websites;
- Any organization of which you are a member;
- An employee of the group of companies, who recommends you, via telephone, email, or other communication channels;
- Hotels or other event site service providers, or their representatives;
- Thailand Securities Depository Co., Ltd., and/or banks/financial institutions;
- Contractors, vendors, or service providers;
- Your representatives; or
- Information disclosed to the public, any mailing or marketing list that is disclosed to the public, for commercial purposes, by the private sector, any trade association, and/or any government agency, such as on a website, or online social media (such as Facebook or LinkedIn), etc.

## **3. How do we use your Personal Data?**

We collect Personal Data from customers, visitors, and representatives to enable us to operate our business. Such Personal Data will be used for the following objectives:

### **Employees and Job Applicants**

- For employee and business administration and management, and the Company's operations;
- For human resource management, such as to assist employees with onboarding, set plans, and perform acts regarding employment and training, promotion, rotation and relocation of employees, and manpower allocation, etc.;
- For employee identity verification or identification when accessing digital technology systems, and to examine usage of digital technology systems by employees, according to our policy for IT system users;
- For any other benefits regarding our business operations, such as to offer products to customers or business partners; to communicate; improve our products or services;

(Translation)

organize training; perform statistical or marketing analysis; conduct consumer surveys; manage our IT systems, conduct testing and development; maintain our security systems and measures;

- To comply with any applicable procedures, laws, rules, or court orders; comply with any applicable laws, rules, agreements, or policies set out by a government supervisory authority, law enforcement authority, government agency, dispute resolution agency, or any supervisory authority;
- To enable data storage and processing to be in order and in compliance with any applicable laws, rules, and regulations, including the Company's work rules and applicable laws, such as the Computer Crime Act B.E. 2550, as amended;
- To comply with any requirements with respect to payment of wages, compensation, benefits, compensation plans, offers, rewards, and compensation schedules;
- For performance appraisal, internal reporting, data analysis, and handling of monthly or daily employment;
- For internal communications, notification of internal and external appointments, whether through telephone, text, email, post, electronic media, such as applications with communications features, or any communication channels;
- To assess job applications for new job opportunities and making employment decisions, including promotion;
- To conduct surveys, government statistical surveys, or to fill in official request forms, for whatever reason;
- To examine your information, as allowed by law, your physical information, or your ability to work; to conduct equal employment opportunity examinations;
- To investigate complaints and issues concerning inappropriate behavior, as part of disciplinary proceedings;
- For use in the Company's internal and external public relations materials;
- To keep records of employees, insurance, medical history, and insurance plans;
- For reference and background checks conducted by any employee of the Company, or other persons, in order to avoid actual or possible conflicts of interest, for compliance with the regulations of local or foreign administrative authorities, and to examine the terms and conditions of employment by any member of the Company.
- To facilitate investigations by competent officers; to provide assistance in respect to law enforcement, or investigations by, or on behalf of, the Company, by police officers, government agencies, or by any other supervisory agencies of any countries or jurisdictions; perform reporting obligations; perform any requirements under law, or as approved by government agencies or any other supervisory agencies of any countries or jurisdictions;
- To process payments; collect charges or payments; fulfil accounting objectives; perform accounting management; perform auditing; pursue debt payments, in cases where employees owe the Company;
- To examine, prevent, or perform any acts in connection with violation of law and risk prevention, in the case of threatened fraud, money laundering, national security issues, actual or threatened illegal acts, or threats to the lives, health, or safety of other persons;
- To ensure the Company's safety;

(Translation)

- To conduct organizational restructuring or any other transactions that are part of business acquisitions or sales, or business acquisition or sale proposals, which result in your Personal Data being transferred or disclosed;
- To comply with rules; to conduct business inspections (both internal and external);
- To comply with our internal policies;
- To retain, record, backup, or destroy Personal Data;
- To perform any management-related acts in connection with any of the above objectives; and
- To perform any necessary acts which are directly related to any of the above objectives.

### **Stakeholders**

- For employee and business administration and management, and the Company's operations;
- For verification or identification of shareholders and independent directors, including their related persons, such as their spouses, children, emergency contacts, guarantors, or persons who give consent on behalf of legal representatives, guardians, and/or estate administrators; parents and/or legal representatives; grantors of powers at all levels; and beneficiaries;
- For any other benefits regarding our business operations and administration, such as to make meeting agendas for shareholders' meetings, board of directors' meetings, or other internal meetings, as well as other activities for Stakeholders to attend, and for a post-event satisfaction assessment;
- For sale and purchase transactions or other transactions by Stakeholders, including risk assessments for investments, according to applicable procedures, laws, and regulations;
- To comply with any applicable procedures, laws, rules, or court orders; comply with any applicable laws, rules, agreements, or policies set out by a government supervisory authority, law enforcement authority, government agency, dispute resolution agency, or any supervisory authority;
- To enable data storage and processing to be in order and in compliance with any applicable laws, rules, and regulations, including the Company's work rules and applicable laws, such as the Computer Crime Act B.E. 2550, as amended;
- To comply with any requirements with respect to payment of wages, compensation, benefits, compensation plans, offers, rewards, and compensation schedules;
- For performance appraisal, internal reporting, data analysis, and performance of contractual obligations;
- For internal communications, notification of internal and external appointments, whether through telephone, text, email, post, electronic media, such as applications with communications features, or any communication channels;
- To process payments; collect charges or payments; fulfil accounting objectives; perform accounting management; perform auditing; pursue debt payments, in cases where Stakeholders owe the Company;
- To facilitate investigations by competent officers; to provide assistance in respect to law enforcement, or investigations by, or on behalf of, the Company, by police officers,

government agencies, or by any other supervisory agencies of any countries or jurisdictions; perform reporting obligations; perform any requirements under law, or as approved by government agencies or any other supervisory agencies of any countries or jurisdictions;

- For anti-money laundering crime checks (e.g. transaction suspension, involvement in anti-money laundering schemes, or transaction rejections by financial institutions), examination of information about bankruptcy, information about any related legal entities, information for the KYC process, information about occupations or businesses considered risky under anti-money laundering laws, and information about offenses received from supervisory bodies; to examine, prevent, or perform any acts in connection with violation of law and risk prevention, in the case of threatened fraud, money laundering, national security issues, actual or threatened illegal acts, or threats to the lives, health, or safety of other persons;
- To ensure the Company's safety;
- To conduct organizational restructuring or any other transactions that are part of business acquisitions or sales, or business acquisition or sale proposals, which result in your Personal Data being transferred or disclosed;
- To comply with rules; to conduct business inspections (both internal and external);
- To retain, record, backup, or destroy Personal Data;
- To perform any management-related acts in connection with any of the above objectives; and
- To perform any necessary acts which are directly related to any of the above objectives.

### **Suppliers**

- To communicate with you; to get to know you; verify your identity; verify any information provided by you to us;
- To perform a contract; enter into a contract with you; proceed with management procedures; fulfil and effect our requests or any transactions contemplated herein, or any other documents that you may send to us from time to time; analyze risks in respect to our business; pay any outstanding payments to you; amend or terminate a contract; execute our contractual rights against you;
- To receive products and/or services; exercise any contractual rights that we have against you; obtain information about services and/or products; receive support or assistance in regard to the provision of services and/or products; send inquiries;
- To communicate with you, including communications about product management or other information about your products, or any accounts that we have with you, provision of technical support for any of our websites and applications, or communications about any changes relating to this privacy policy;
- To process payments; issue invoices; collect charges or payments; confirm purchase orders; fulfil accounting objectives; perform accounting management; perform auditing;
- To examine, prevent, or perform any acts in connection with violation of law and risk prevention, in the case of threatened fraud, money laundering, national security issues, actual or threatened illegal acts, or threats to the lives, health, or safety of other persons;

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- To provide information about other products or services which may be of interest to distributors, Suppliers, or Representatives, who may opt out of receiving this information at any time;
- To ensure the Company's safety;
- To assist the Company in its business operations, such as to serve advertisements, public relations materials, sales promotions, and other communications; improve our products or services; organize training; hold marketing activities; perform statistical or marketing analysis; conduct consumer surveys; manage our IT systems, conduct testing and development; maintain our security systems and measures;
- To assist the Company in its business regarding business acquisitions or sales, or business acquisition or sale proposals, which result in your Personal Data being transferred or disclosed;
- To comply with rules; to conduct business inspections (both internal and external);
- To comply with our internal policies;
- To retain, record, backup, or destroy Personal Data;
- To comply with any applicable laws, rules, agreements, or policies set out by a government supervisory authority, law enforcement authority, government agency, dispute resolution agency, or any supervisory authority;
- To provide assistance in respect to law enforcement, or investigations by, or on behalf of, the Company, by police officers, government agencies, or by any other supervisory agencies of any countries or jurisdictions; perform reporting obligations; perform any requirements under law, or as approved by government agencies or any other supervisory agencies of any countries or jurisdictions;
- To fulfil quality control and training objectives, in cases where our communications are recorded;
- To perform any management-related acts in connection with any of the above objectives; and
- To perform any necessary acts directly relating to any of the above objectives.

### **Customer**

- To communicate with you; to get to know you; verify your identity; verify any information provided by you to us;
- To offer, sell, provide, manage, operate, proceed with, and otherwise handle our products and services for you, including for procurement; communicate with you in order to respond to your purchase orders; deliver products based on your purchase orders; provide services to you;
- To perform a contract; enter into a contract with you; proceed with management procedures; fulfil and effect your requests or any transactions contemplated herein, or any other documents that you may send to us from time to time; analyze risks in respect to our business; collect any outstanding payments from you; amend or terminate a contract; pursue debt payments; execute our contractual rights against you;
- To provide our services and/or products to our customer; provide product warranties; provide installation or repair services; provide advice or consultation regarding our

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products and services; provide information about our products; provide support or assistance in regard to the provision of our services and/or products;

- To communicate with you, including communications about product management or other information about our products, or any accounts that we have with you, provision of technical support for any of our websites and applications, or communications about any changes relating to this privacy policy;
- To process collections or payments; issue invoices; collect charges or payments; fulfil accounting objectives; perform accounting management; perform auditing;
- To examine, prevent, or perform any acts in connection with violation of law and risk prevention, in the case of threatened fraud, money laundering, national security issues, actual or threatened illegal acts, or threats to the lives, health, or safety of other persons;
- To ensure the Company's safety;
- To assist the Company in its business operations, such as to serve advertisements, public relations materials, sales promotions, and other communications; improve our products or services; organize training; hold marketing activities; perform statistical or marketing analysis; conduct consumer surveys; manage our IT systems, conduct testing and development; maintain our security systems and measures;
- To assist the Company in its business regarding business acquisitions or sales, or business acquisition or sale proposals, which result in your Personal Data being transferred or disclosed;
- To comply with rules; to conduct business inspections (both internal and external);
- To comply with our internal policies;
- To retain, record, backup, or destroy Personal Data;
- To comply with any applicable laws, rules, agreements, or policies set out by a government supervisory authority, law enforcement authority, government agency, dispute resolution agency, or any supervisory authority;
- To provide assistance in respect to law enforcement, or investigations by, or on behalf of, the Company, by police officers, government agencies, or by any other supervisory agencies of any countries or jurisdictions; perform reporting obligations; perform any requirements under law, or as approved by government agencies or any other supervisory agencies of any countries or jurisdictions;
- To fulfil quality control and training objectives, in cases where our communications are recorded;
- To perform any management-related acts in connection with any of the above objectives; and
- To perform any necessary acts directly relating to any of the above objectives.

### **Other Third Parties**

- To communicate with you; to get to know you; verify your identity; verify any information provided by you to us;
- To communicate with you, including communications about product management or other information about our products, or any accounts that we have with you, provision of technical support for any of our websites and applications, or communications about any changes relating to this privacy policy;

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- To process payments; issue invoices; collect charges or payments; confirm purchase orders; fulfil accounting objectives; perform accounting management; perform auditing;
- To examine, prevent, or perform any acts in connection with violation of law and risk prevention, in the case of threatened fraud, money laundering, national security issues, actual or threatened illegal acts, or threats to the lives, health, or safety of other persons;
- To provide information about other products or services which may be of interest to distributors, Suppliers, or Representatives, who may opt out of receiving this information at any time;
- To ensure the Company's safety;
- To assist the Company in its business operations, such as to serve advertisements, public relations materials, sales promotions, and other communications; improve our products or services; organize training; hold marketing activities; perform statistical or marketing analysis; conduct consumer surveys; manage our IT systems, conduct testing and development; maintain our security systems and measures;
- To comply with rules; to conduct business inspections (both internal and external);
- To comply with our internal policies;
- To retain, record, backup, or destroy Personal Data;
- To comply with any applicable laws, rules, agreements, or policies set out by a government supervisory authority, law enforcement authority, government agency, dispute resolution agency, or any supervisory authority;
- To provide assistance in respect to law enforcement, or investigations by, or on behalf of, the Company, by police officers, government agencies, or by any other supervisory agencies of any countries or jurisdictions; perform reporting obligations; perform any requirements under law, or as approved by government agencies or any other supervisory agencies of any countries or jurisdictions;
- To fulfil quality control and training objectives, in cases where our communications are recorded;
- To perform any management-related acts in connection with any of the above objectives; and
- To perform any necessary acts directly relating to any of the above objectives.

If we collect your Personal Data for any other objectives, we intend to inform you of such objectives at the time of collection.

#### **4. In which case and how do we disclose your Personal Data to a third party?**

We do not sell Personal Data, but we may share anonymized or de-identified Personal Data to third parties.

We intend to disclose Personal Data only for the original purpose for which the data was collected, or for related objectives, for our business operations or management, including when it is necessary for the provision of products or services as per your requests, assisting us in our business operations, or for security purposes, as described above.

Furthermore, sometimes we may disclose your Personal Data to third parties, for the original purpose for which data was collected, or for related objectives. For example, we may disclose your Personal Data if it is necessary for the delivery of our products or services, or for

your participation in activities, as requested by you, for the Company's business operations, for security purposes, or for compliance with the law.

We may share your Personal Data to any of the following persons:

- Group of companies as Global Power Synergy Public Company Limited, in any country;
- Shareholders, including their executives, whether they are natural persons or legal entities, companies in the same group as the shareholders';
- Organizers, advertisers, the press, and sponsors of events or exhibitions;
- Hotels or other event site service providers, or their representatives, relating to events or exhibitions;
- Our contractors, service providers, suppliers, and other agents, who act on behalf of the Company or who are retained by the Company, such as event-related service providers, banking or financial service providers, hosting service providers, cloud application or network providers, event registration service providers, domestic and overseas tourism service providers, security service providers, auditing service providers, legal service providers, insurance service providers, marketing survey service providers, email management service providers, postal service providers, representatives and agents that sell or promote products and services on our behalf, auction service providers, each of which may not be based in Thailand, and which may be based in a country where personal data protection standards are inadequate, or sub-standard, when compared to the Thai PDPA;
- Thailand Securities Depository Co., Ltd., banks, or financial institutions, as the case may be;
- Any persons to whom you agree to provide your Personal Data;
- Persons engaged in the sale of the Company's business, in whole or in part, a merger, or acquisition; and
- Any persons or government agencies, as required by the law, Court orders, or orders of any competent authorities;
- Supervisory bodies, government agencies, private organizations, or state-owned enterprises having the duty, according to the law, to supervise the Company's business operations, when they require the Company to disclose Personal Data.
- Any entities established aboard which provide service of financial transactions for you in the case that you have residence aboard both temporary period or permanent.

We may hire third parties to fulfil any of the above objectives, whether in whole or in part, or for the development or maintenance of our system. In such cases, we will control and put in place measures to ensure that such third parties will store and use Personal Data strictly in accordance with this policy, any data security requirements and conditions, and the personal data protection law.

## **5. Data retention**

To secure Personal Data, the Company has implemented the following measures:

- 1) The right to access, use, disclose, and process Personal Data is limited to certain persons. The identity verification requirement, before accessing or using Personal Data, must be strictly complied with.

- 2) The Company has established a safe encoding method to prevent loss or unauthorized or unlawful access, destruction, use, alteration, or disclosure of Personal Data.
- 3) Personal Data may be transferred, including transfer for storage on a database, to an external organization or a third country only if the personal data protection measures implemented by such organization, or third country, are of equal or higher standards than the measures hereunder.
- 4) In cases where the Company retains a third party to store the Personal Data of employees, such as document storage companies, the Company will require those companies to keep the information confidential, and prohibit use to only the purposes determined by the Company.

We will collect, use, disclose, and retain your Personal Data throughout our legal relationship with you, such as throughout the sale and purchase of our products. Upon the end of our relationship with you, we will retain your data, including Personal Data, only as necessary for the fulfilment of the above objectives, which in no case shall exceed 10 years from our last contact, or from the end of our relationship with you, except where it is necessary for the Company to retain your Personal Data for more than 10 years, to the extent that it is so permitted by law.

We may store Personal Data on networks of which the servers are in Thailand. However, we may transfer Personal Data to a third country, in order to achieve any of the purposes specified above. We will comply with any personal data protection law which is applicable to your Personal Data.

## **6. Our website**

When you visit publicly accessible pages on our website, the server of our website will keep log records, as well as the following data:

- Your IP address, which simply is a unique address that identifies your computer when it is connected to the Internet;
- Your search words;
- The operating system and Internet browser that you are using; and
- The information downloaded by you (such as web pages, document files, and software), and the time of such downloading.

The above data will be used only for statistical purposes, to enable us to know which part of the Website is visited most frequently, so that we know how to improve our services.

If you contact us, register through any of our websites, or email us, we intend to use your Personal Data only in response to your requests or inquiries. If your consent is given as required by law, we may add your email address to your contact details for mailing purposes. You may opt out of receiving information about the Company, events, sales promotions, or products and/or services of the Company.

### **Cookies**

As for any restricted parts of our website, we will use **cookies**, which are tools that recognize your device and record certain information during your visit to our website using the same device. Our website uses cookies in order to better respond to you when you use certain parts of the website. The information collected and analyzed by us includes information about your computer and connections, such as the type and version of the browser being used by you, the type and version of the browser plug-ins being used by you, your operating system, and your language preference. Such information does not relate to, and cannot identify, a person. You

may change your browser settings so that your browser does not detect cookies, or to disable cookies.

It is important that you do not share your password with anyone, and you do not allow any person to access your computer without your authorization. You should log out every time, if you access our website through a shared computer.

### **Log Files**

We may automatically keep log files, which include IP addresses, error reports, activities, timestamps, and URLs. Such information may be associated to personally identifiable information, and must be retained for a time period as required by law.

### **CCTV**

We use a CCTV system to record images of persons and vehicles around our premises, for public safety and for prevention and detection of crimes. Our CCTV cameras provide 24-hour footage of our entrance, lobby, balconies, outdoor parking areas, areas along our fence, and other accessible areas. The information is recorded for one month, and is then overwritten. Camera locations were chosen to avoid footage which is not related to the purpose of inspection and monitoring. We do not keep audio recordings.

Live feeds from our CCTV system can be examined, only in necessary circumstances, by an authorized person. We believe that live feeds and visual recordings are seen only by our authorized employees, who are directly responsible for access to such information. We respect your privacy. We do not have CCTV cameras in locations where privacy can be expected, such as toilets.

### ***Other websites***

Our website may contain links to third-party websites. We do not control these websites, and we are not responsible for their practice concerning data and privacy.

Furthermore, we may operate, or make available, websites or mobile applications for third parties, including customers, when they participate in exhibitions or events. These websites belong to customers or other third parties, and these mobile applications are made available only for such exhibitions. The Company is not responsible for the data privacy practice of such customers and third parties.

Before you disclose your personal data to any websites linked from our website, or any websites or mobile applications operated or made available by us for third parties, we recommend that you read their privacy policies, and the terms and conditions of such websites or applications.

## **7. Minors**

We do not know the age of each visitor to our website. If you are a parent or guardian of a minor who provides their Personal Data to us without your knowledge and consent, you may contact us and request us to delete such data, in accordance with this Privacy Policy. For the purpose of this Policy, a minor is anyone who is below 20 years of age.

## **8. Consent**

To the extent permitted by personal data protection law, when you use or access our website, or provide Personal Data to us, it shall be deemed that:

- You give consent to our collection, use, and processing of your Personal Data, for the purposes and by the methods specified above, which may be amended from time to time, unless and until you withdraw such consent. You may withdraw your consent at any time, by giving us written notice of your consent withdrawal. We can reject your request, if permitted by law; and

- You give consent to our disclosure, or the transfer, of your Personal Data to third parties, for the purposes and by the methods specified above. You may withdraw your consent anytime, by giving us written notice of your consent withdrawal.

If you provide Personal Data of another person, you must obtain prior consent from that person. In such event, you represent and warrant that you have obtained consent from that person, or you are otherwise entitled to provide Personal Data of such person to us. When you provide Personal Data of such person to us, it shall be deemed that you represent that such person acknowledges and gives consent under this privacy policy.

If applicable personal data protection law requires any additional consent, we, or any of our third party service providers, will obtain your consent for the collection and use of your Personal Data at the time of collection.

You are obligated to provide your Personal Data to the Company to enable us to fulfil your requests, or to provide services to you, as requested. Your lack of approval for the collection, use, processing, or disclosure of certain types of Personal Data requested by us may result in our inability to perform our legal obligations, or perform our business, or conduct transactions with you.

## **9. Your Rights**

- 9.1 Right of withdrawal of consent: You may withdraw your consent any time, unless it is otherwise specified by law. Withdrawal of your consent will not affect the lawfulness of any data processing based on your consent before its withdrawal.
- 9.2 Right to request deletion or destruction of Personal Data: You have the right to request that we delete or destroy your Personal Data that is in our possession or control, or request that such data be anonymized.
- 9.3 Right to data portability: You have the right to request that we transfer your Personal Data, in a commonly used and machine-readable format, to another controller, which is subject to legal requirements.
- 9.4 Right to object: You have the right to object to the collection, use, or disclosure of your Personal Data, or the cessation of our use of your Personal Data, except as requested in accordance with the relevant legal provisions.
- 9.5 Right to temporarily restrict the use of your Personal Data: You have the right to request that we restrict the processing of your Personal Data. That is, the Controller may continue to keep your Personal Data, but can no longer process such data, unless consent is given, or it is permitted by law.
- 9.6 Right of access: You have the right to request access to, and obtain a copy of, your Personal Data that is held by us. Any such request will take 30 days to process, unless otherwise specified by law.
- 9.7 Right to rectification: You have the right to request that we keep your Personal Data accurate, complete, and updated, which we do in every step of our procedures.
- 9.8 Right to complain: You have the right to file complaints with officers, or any supervisory authorities, in regard to personal data protection.

## **10. How to contact us?**

Should you have any questions about this privacy policy, or wish to exercise any of your rights concerning the Processing of your Personal Data, please contact us at Division of Corporate Governance and Compliance; Email: [dl-gpsc-ggm-dc-pdpa@gpscgroup.com](mailto:dl-gpsc-ggm-dc-pdpa@gpscgroup.com) Tel 02-1405333 or 02-1404745

(Translation)

**11. Revisions of our Personal Data Protection Policy**

We may review and amend this privacy policy from time to time, so that it corresponds with any amendments to the applicable law, including the law on personal data protection, or any changes in our technology, etc. We ask that you regularly visit our website for updates. When we update this Policy, we will inform users by displaying the message 'Newly updated.' after the link to this Privacy Policy on our website for 30 days. To comply with the legal requirements, we may seek your prior consent for changes to this Policy, if necessary.

This policy shall come into effect on May 5, 2021.

Announced on this May 5, 2020.

.....(*Signature*).....

(Mr. Worawat Pitayasiri)

CEO and Managing Director