



(Translation)

Personal Data Protection Policy

Saha Pathana Inter-Holding Public Company Limited

1. Principles and Objectives

Saha Pathana Inter-Holding Public Company Limited (the “Company”) recognizes the importance of personal data security as a fundamental rights that must be protected by law. Therefore, the Company has established the Personal Data Protection Policy to ensure compliance with the Personal Data Protection Act B.E. 2562 (2019), other relevant laws, and international standards related to privacy, aligning with principles of good corporate governance. This aligns with good corporate governance practices, ensuring that all related parties are informed and adhere to this policy.

2. Scope of Enforcement

This Personal Data Protection Policy applies to all personal data processing activities conducted by the Company and any individuals who are aware of personal data due to their involvement in the Company’s operations, in which all must comply with the law and this Personal Data Protection Policy.

For personal data collected by the Company prior to when the Personal Data Protection Act B.E. 2562 (2019) came into effect, the Company shall continue to collect and use such data for the original purposes. Any disclosure or other activities beyond collection and use of the aforementioned personal data, the Company shall strictly comply with the Personal Data Protection Act B.E. 2562 (2019).

3. Definition

“Company” refers to Saha Pathana Inter-Holding Public Company Limited.

“Person” refers to a natural person.

“Data Subject” refers to a individual person who owns the personal data.

“Personal Data” refers to any information related to a person that enables the identification of that person, either directly or indirectly, but not including the information of the deceased persons in particular.

“Processing of Personal Data” refers to the collection, use, or disclosure of personal data.

“Data Controller” refers to a person or juristic person with the authority and responsibility to make decisions regarding the collection, use, or disclosure of personal data.



“Data Processor” refers to a person or juristic person that collects, uses, or discloses personal data on behalf of or under the instruction of the Data Controller. The Data Processor is not classified as the Data Controller.

4. Collection of Personal Data

The Company shall collect personal data based on its sources, purposes, and principles of collection as follows:

4.1 Sources of Personal Data

4.1.1 Collected personal data directly from the data subject, such as through documents and/or various forms, surveys conducted by the Company, either in paper format or online or usage of the Company’s electronic systems or websites, including data collected through cookies.

4.1.2 Collected personal data from indirect sources, such as retrieval of personal data through an electronic systems, websites, or inquiry from third parties, in which the Company shall notify the data subject without delays no later than 30 (thirty) days from the date of data collection. Additionally, the Company shall obtain consent for collecting such personal data from the data subject unless it is exempt from obtaining consent or notifying the data subject as stipulated by the Personal Data Protection Act B.E. 2562 (2019) and other relevant laws.

4.2 Objectives and Principles of Personal Data Collection

4.2.1 The Company shall collect personal data only to the extent necessary for lawful purposes, as informed to the data subject before or at the time of data collection, such as providing services, improving service efficiency, conducting various audits, analyzing and preparing documentation requested by government agencies or other relevant organizations, supporting the Company’s business operations, and managing the Company’s internal administration and human resources management. The Company shall obtain consent from the data subject before or during the collection of personal data, except in the following cases where consent is not required by law:

(1) To achieve the objectives related to the preparation of historical documents, archives for public benefit, or for research or statistical, the Company shall implement appropriate protective measures to safeguard the rights and freedoms of the data subject.

(2) To prevent or mitigate harm to the life, body, or health of the person.

(3) To fulfill the terms of a contract to which the data subject is a party, or to take actions at the request of the data subject prior to entering into the contract.



(4) To carry out duties in the public interest by the data controller, or for the exercise of the public authority granted to the data controller.

(5) For the legitimate interests of the data controller or of another person or legal entity other than the data controller, unless such interests are outweighed by the fundamental rights of the data subject with respect to their personal data.

(6) For compliance with the law by the data controller.

4.2.2 In cases where the data subject must provide personal data to comply with the law or a contract, or it is necessary to provide personal data to enter into a contract, or must provide data in any other way, if the data subject does not provide such information, it may result in the suspension or temporary cessation of any transactions or activities related to the data subject until the Company receives the personal data. This is because the Company will not be able to process such data, or the law may prohibit the continuation of such transactions or activities, etc.

4.2.3 The Company is required to obtain consent from the data subject prior to or at the time of collecting sensitive personal data, in accordance with the Company's criteria and in compliance with laws.

5. Use and Disclosure of Personal Data

The Company shall process personal data in accordance with the objectives and principles outlined in Section 4.2, "Objectives and Principles of Personal Data Collection." The Company may disclose personal data to third parties only to the extent necessary, with the consent of the data subject, unless such disclosure is permitted by law. Personal data may be disclosed to external persons, organizations, or government agencies as follows:

- (1) Affiliates or subsidiaries of the Company.
- (2) Business partners, contractors, service providers, business allies, and/or distributors.
- (3) Credit reporting agencies, financial institutions, and/or banks.
- (4) Government agencies with legal authority.
- (5) Other relevant organizations or entities related to or involved in the Company's business operations and/or other legal entities.

6. Retention Period of Personal Data

The Company shall retain personal data for the following periods:

- 6.1 For the period required by applicable laws regarding the retention of personal data.



6.2 In cases where there is no specific legal requirement for the retention period of personal data, the Company shall retain personal data only as necessary for the purposes for which the data was collected. The Company shall determine the retention period based on the operational needs of the Company.

Once the retention period has expired, the Company shall erase, destroy, or anonymize the personal data in such a way that it can no longer identify the individual to whom the data pertains.

7. Personal Data Security

The Company shall implement appropriate security measures to protect personal data against theft, unauthorized access, use, alteration, correction, or disclosure, as well as to prevent data loss or any unlawful actions concerning personal data.

8. Rights of the Data Subjects

This policy has been established to ensure that data subjects can exercise their rights under the Personal Data Protection Act B.E. 2562 (2019) as follows:

8.1 Right to withdraw consent: the data subject has the right to withdraw consent for the processing of personal data that they previously provided to the Company at any time.

8.2 Right to access personal data: the data subject has the right to request access to their personal data and ask the Company to provide a copy of such data, as well as to request information about how the Company obtained personal data that the data subject did not provide consent for.

8.3 Right to rectify personal data: the data subject has the right to request that the Company correct any inaccurate or outdated personal data or to add incomplete information.

8.4 Right to erase personal data: the data subject has the right to request that the Company erase their personal data under certain circumstances.

8.5 Right to suspend the use of personal data: the data subject has the right to request the suspension of the use of their personal data under certain circumstances.

8.6 Right to transfer Personal Data: The data subject has the right to request a copy of their personal data and to ask the Company to send or transfer their personal data to another data controller or to the data subject themselves under certain circumstances.

8.7 Right to object to the processing of personal data: The data subject has the right to object to the processing of their personal data under certain circumstances.



The data subject may exercise these rights through the channels specified by the Company. However, the Company may refuse the exercise of such rights if there are legitimate grounds not contrary to the law. Additionally, the data subject has the right to file a complaint with the relevant authorities if the Company or any data processor violates or fails to comply with the Personal Data Protection Act B.E. 2562 (2019) or any regulations issued under the Act.

9. Review and Update of the Policy

The Company shall review the Personal Data Protection Policy on an annual basis.

10. Contact

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This Personal Data Protection Policy was approved by the resolution of the Board of Directors' meeting, No. 12 (Board # 28), held on March 10, 2022 and shall be effective from March 11, 2022 onwards.

Somkid Jatusripitak

(Mr. Somkid Jatusripitak)

Chairman of the Board of Directors