

Personal Data Protection Policy
Thaire Group Holdings Public Company Limited

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Personal Data Protection Policy

Thaire Group Holdings Public Company Limited ("the Company"), as a data controller under the Personal Data Protection Act of B.E. 2562 (2019), recognizes the importance of personal data protection and fundamental rights of the data subjects as stipulated in the Constitution. The Company has accordingly established this personal data protection policy to ensure that the handling of personal information and all other relevant actions conform with the personal data protection law, the internationally accepted principles, and other related rules and regulations.

1. Objective

To ensure that the Company protects personal information and fundamental rights of the data subjects as stipulated by law, stores, collects, uses and discloses personal data to the extent deemed necessary and consistent with the law, and maintains data security in order to prevent any unlawful use of the data, which may cause damages to the data subjects.

2. Scope of Enforcement

This policy applies to the directors, executives, employees, and any third parties working for the Company, covering every and all work units, activities, and business processes of the Company.

3. Definition

"Personal data" refers to any information relating to an individual person, which enables the identification of such person, whether directly or indirectly, but not including the information of the deceased persons as specified in the Personal Data Protection Act of 2019, as amended.

"Data subjects" refer to a person whose personal information is collected, used or disclosed by the Company, including, but not limited to customers, shareholders, business partners, service providers, employees, and other stakeholders of the Company.

"Data processing" refers to any operation performed on personal data or a data set, whether or not by automated means, including but not limited to collecting, recording, organizing, structuring, storing, modifying, altering, retrieving, consulting, using, disclosing by transmission, transferring, disseminating or otherwise making available, aligning, combining, restricting, erasing or destroying of personal data.

"PDPA" refers to the Personal Data Protection Act of 2019, including the subordinate laws enacted by virtue of the Personal Data Protection Act of 2019, and as to be amended from time to time.

4. Principle of Personal Data Protection

The Company values adequate and proper personal data security that meets legal requirements and international standards and puts in place measures to protect the data subjects' rights, freedoms, and interests according to the level of risk to their personal information.

The processing of personal data must be carried out with lawfulness, fairness, and transparency and to the extent necessary for the specific and definite purpose. The personal data must be corrected, updated, and

retained only for a period of time necessary to achieve the purpose. When data retention is no longer necessary, the Company will erase, destroy, or anonymize the personal data to make it unidentifiable to the data subjects.

In addition the Company must have in place appropriate security measures to prevent unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of the personal data.

5. Purposes of Personal Data Processing

The Company will collect, use and/or disclose the personal data as prescribed by law. The processing of the personal data must be for the purpose of supporting our business operation and only to the extent necessary for achieving the Company's objective and in line with laws and regulations, the details of which are as follows:

Whereas the Company primarily operates as a holding company and does not intend to collect personal data, nor does it conduct any business that directly collects personal data from customers, the Company may, however, collect, use, or disclose personal data for certain purposes in connection with the business operations of its subsidiaries

As for other activities for which the Company is the data controller, the Company will not collect the personal data without the data subjects' consent, unless otherwise permitted by law.

The Company do not collect personal information in relation to racial or ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data which affects the data subjects in the same manner and may give rise to a sense of unfair discrimination or inequality, without the explicit consent from the data subjects, unless otherwise permitted by law.

The Company shall not perform any act that differs from those specified in the purposes of data collection unless

- 1) The new purposes have been informed to and consent has been obtained from the data subjects.
- 2) The Company is obligated to comply with the PDPA or other relevant laws. For any consent on which the data collection, use, and/or disclosure is based, the data subjects have the right to withdraw their consent at any time. The withdrawal of consent, however, will not affect the collection, use and/or disclosure of personal data to which the data subjects have already given consent prior to such withdrawal.

In the case the Company have obtained personal data from other sources e.g. shareholder information from securities brokers or registrar or information from recruitment companies, hospitals or other persons, as the case may be, the Company will inform the data subjects of data collection from such other sources within 30 days from the collection date, whereby the said operation must conform with the regulations prescribed by law.

6. Retention of Personal Data

The Company will retain the personal data to the extent necessary for achieving the processing purposes mentioned above and in line with the regulations prescribed by law. In this regard, The Company will monitor and ensure the said operation is carried out under the principle of personal data protection prescribed in the PDPA.

The Company will take appropriate actions to erase or destroy the personal data or anonymize the personal

data to make it unidentifiable to the data subjects upon the end of the retention period or when the data is no longer needed for the intended purpose, except where it is necessary to comply with the PAPA laws and regulations.

7. Disclosure of Personal Data

The Company may disclose the personal data for the aforementioned purposes under the regulations prescribed by law to any of the following parties:

- 1) The Company's service providers, such as consultants, lawyers, auditors, or providers of other services relating to the Company's business operation; and
- 2) Government agencies or other agencies that have legal authority, such as the Office of Insurance Commission, the Office of the Securities and Exchange Commission, the Anti-Money Laundering Office, the Office of the National Anti-Corruption Commission, or any other persons to whom the Company is legally obligated to disclose the information.

8. Cross-Border Transfer of Personal Data

The Company may transfer, where necessary, the personal data to any person or agency abroad, whereby the Company will comply with the regulations prescribed by law.

9. Rights of Data Subjects

The Company is fully aware of a data subject's rights prescribed in the PDPA, as follows:

- 1) Right to withdraw the consent given to the Company, except where there is a limitation on the consent withdrawal as specified by law or there is a contractual obligation which benefits the data subject. The withdrawal of consent, however, shall not affect the collection, use or disclosure of personal data to which the consent has already been given. The Company will notify the impact of the consent withdrawal if it poses any effect on the data subject.
- 2) Right to request access to and copies of personal data processed by the Company or to request disclosure of the acquisition of the personal data obtained without consent from the data subject.
- 3) Right to request the Company to rectify any personal data to ensure that it is accurate, complete, and up-to-date.
- 4) Right to request erasure, destruction, or de-identification of the personal data according to the regulations prescribed by law.
- 5) Right to request the Company to suspend the use of personal data according to the regulations prescribed by law.
- 6) Right to request the Company to transfer the personal data to other data controllers according to the regulations prescribed by law.
- 7) Right to object the processing of personal data according to the regulations prescribed by law.
- 8) Right to file a complaint to the expert committee according to the regulations prescribed by law.

The exercise of the aforementioned rights by the data subject and the acts performed by the Company must comply with the regulations prescribed in the PDPA. The Company may refuse to act as requested in case

there are legitimate grounds as specified by law.

Any data subject who wishes to exercise the said rights can contact the Company's data protection officer via the channel specified below. The Company will consider the request and notify the result to the data subject within 30 days of receiving the request. In this regard, the Company may reject the data subject's request to exercise his/her rights if it is permitted by law.

10. Responsibility of Data Controller

The Company's executives and employees must strictly comply with the policy, rules, and measures related personal data protection, both existing and to be introduced in the future. Penalties for violation or non-compliance shall be as outlined in the Company's regulations.

11. Review of Personal Data Protection Policy

The Company must review the policy and relevant rules and regulations on a yearly basis or when there is any material change in order to conform with such change to the PAPA laws and regulations.

12. Contact Channel

Data Protection Officer

Thaire Group Holdings Public Company Limited

No. 100/4 Sathorn Nakorn Tower, 4th Floor, North Sathon Road, Silom, Bang Rak, Bangkok 10500

Telephone: 02-660-6111

Office hours: Monday-Friday, except for public holidays, 9:00 a.m. – 5:30 p.m.

Email: DPO@thaireholding.co.th