

Subject: Personal Data Protection Policy and Personal Data Management Guidelines Pinthong Industrial Park Public Company Limited

1. Definitions

“**Company**” means Pinthong Industrial Park Public Company Limited and shall include any person or persons authorized or instructed by the Company to act in accordance with the purposes of this Policy.

“**You**” means a data subject whose personal data is processed by the Company, including but not limited to investors, customers, website users, professionals in the securities business, suppliers, employees, personnel, agents, and any persons related to the activities and operations of the Pinthong Group.

“**Person**” means a natural person.

“**Pinthong Group**” means affiliated companies, whether existing at the time this Policy is issued or established thereafter

“**Personal Data Protection Laws**” means the Personal Data Protection Act B.E. 2562 (2019) and its relevant subordinate laws, and shall include any amendments thereto in the future.

“**Personal Data**” means any information relating to a natural person, which enables the identification of such person, whether directly or indirectly, but excludes information of deceased persons in particular, in accordance with the Personal Data Protection Laws.

“**Processing**” means any operation performed on personal data, whether by automated means or not, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure (by transmission, transfer, dissemination, or otherwise making available or accessible), alignment, combination, restriction, erasure, or destruction.

“**Data Controller**” means a natural person or a juristic person having the authority to make decisions regarding the collection, use, or disclosure of personal data.

“**Data Processor**” means a natural person or a juristic person who processes personal data on behalf of, or under the instructions of, the Data Controller, provided that such person or entity is not the Data Controller.

2. General Information

This Policy is prepared to clarify the details and methods of management and processing of personal data obtained by the Company from you, including the purposes of collection, use, disclosure, and processing of such personal data, as well as the retention period and your rights as a data subject. As the

Company conducts its business operations in Thailand, the processing of your personal data shall be subject to and carried out in compliance with the Personal Data Protection Laws of Thailand.

3. Methods of Collection and Receipt of Personal Data

3.1 Personal Data Provided Directly by You: You may provide personal data to the Company directly. This typically occurs when you contact the Company for inquiries, complete forms (whether online or in hard copy), use services, request information, apply for employment, enter into contracts with the Company, receive communications, or provide comments or feedback to the Company.

3.2 Personal Data Collected Automatically by the Company: The Company may automatically collect certain technical information relating to your device, activities, and browsing patterns, including website usage data (browsing), location, language, and gender, through Google Analytics, cookies, and other similar technologies. For further details, please refer to the Company's Google Analytics and Cookies Policy.

3.3 Personal Data Obtained from Third Parties: The Company may, from time to time, obtain your personal data from third parties, such as agents, brokers, service providers, recruitment agencies, government authorities, contractual counterparties, and professional advisors.

In collecting your personal data, you will be informed of the details as set out in this Policy, including but not limited to the legal basis for the collection, use, and/or disclosure of personal data for lawful purposes. Where consent is required under the Personal Data Protection Laws, the Company will obtain your explicit consent in order to process your personal data.

4. Personal Data Collected

4.1 The personal data collected by the Company under this Policy relates to data subjects in the following categories:

(1). **Customers and Investors:** Natural persons who are website visitors, service users, participants in activities or seminars, and any other persons who contact the Company to request information or services, whether such personal data is obtained directly or indirectly.

(2). **Contractual Counterparties, Professionals, and Related Persons:** Natural persons who are contractual counterparties or are otherwise related to any contractual relationship with the Company, including business partners, vendors, suppliers, service providers, contractors, consultants, professionals, and other persons of a similar nature.

(3). **Company Personnel:** Natural persons who are employees, staff, or any persons working for the Company, including directors, executives, specialists, and any persons receiving salaries, wages, benefits,

or other forms of remuneration directly from the Company, and shall also include family members of such personnel.

(4). **Job Applicants:** Natural persons who have submitted job applications or provided personal background information to the Company, whether in writing or verbally, for the purpose of applying for employment or internships with the Company, and who have not yet been selected by the Company, and shall also include family members of such applicants and their referees.

4.2 The personal data collected from you and subject to this Policy may include personal data provided directly by you, personal data collected automatically by the Company, and/or personal data obtained from third parties, including but not limited to the following:

(1) **Personal Information:** Such as name–surname, date of birth, age, gender, photograph, passport number and copy of passport or national identification card, signature, nationality, marital status, and family information.

(2) **Sensitive Personal Data:** Such as religion, criminal records, health information, medical examination results, disability, and biometric data.

(3) **Contact Information:** Such as residential address, telephone number, email address, social media contact details, and emergency contact details.

(4) **Financial Information:** Such as bank account numbers and tax-related information.

(5) **System Usage Information:** Such as registration information for the Company’s systems, user account information, username, password, and PIN (if any); information displayed on user profile pages and service registration pages; information updated or modified in your account; information obtained from other accounts reasonably believed to be under your control; information relating to your use of services, interests, and opinions expressed through the Company’s systems (if any); information relating to your participation in activities on the Company’s systems; survey responses; and information obtained from your communications with the Company or its personnel.

(6) **Technical Information:** Such as data relating to access to the Company’s website and systems, computer traffic data (log), usage records, including device identifiers, IP address, device ID, device type, connection data, system access logs, usage history logs, login logs, user behavior, system usage statistics, access time, use of system functions, and data collected through Google Analytics, cookies, or other similar technologies.

(7) **Education, Training, and Employment Information:** Such as education and training history, certificates and academic transcripts, grades or scores, education level, language proficiency, professional

licenses (including license number, issuance date, expiry date, and renewals), work performance information, employment commencement date, training and test results conducted by the Company or relevant organizations, diplomas or certificates, work history, and salary or wages.

(8) Other Information: Such as images and/or audio recordings captured via closed-circuit television (CCTV), photographs, video recordings, and voice recordings.

4.3 In the event that the Company has collected your personal data prior to 26 February 2022, the Company shall process such personal data in accordance with the requirements of the Personal Data Protection Laws.

5. Purposes and Legal Bases for the Collection, Use, and Disclosure of Personal Data

5.1 The Company processes your personal data for the following purposes (collectively, the “Specified Purposes”) and under the following legal bases:

- **Contractual Necessity:** Where it is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into such contract.
- **Legal Obligation:** Where it is necessary for compliance with the Company’s legal obligations.
- **Legitimate Interests:** Where it is necessary for the legitimate interests of the Company or of any other person or juristic entity, except where such interests are overridden by your fundamental rights.
- **Public Interest:** Where it is necessary for the performance of a task carried out in the public interest by the Company.
- **Vital Interests:** Where it is necessary for preventing or suppressing a danger to the life, body, or health of any person.
- **Consent:** Where you have provided consent to the Company in cases where no other legal basis can be relied upon as specified above or as set out in the table below. In this regard, where the Company requests specific consent from you for any personal data, the Company shall process such personal data in accordance with the purposes notified to you and for which your consent has been obtained. The Company shall process any sensitive personal data only where permitted by law or where explicit consent has been obtained from you.

Specified Purposes
(A) For Compliance with Applicable Laws To comply with applicable laws, rules, and regulations, including the performance of obligations under laws and regulatory requirements applicable to the Company, including but not limited to laws relating to industrial estates, taxation, labor protection, computer-related offences, and personal data protection, whether currently in force or as may be amended or supplemented in the future.

(B) For communication purposes, marketing communications, data analytics, and the development and improvement of the Company's services, including responding to your service requests, inquiries, or feedback, and to ensure that the Company is able to provide such services to you and other persons in an efficient manner.

- To contact you via telephone, short message service (SMS), email, postal mail, or any other channels, for the purpose of making inquiries, providing notifications, or verifying and confirming information relating to your account, conducting surveys, or providing other information related to the Company's services.
- To manage your relationship with the Company and to deliver services to you.
- To provide news, updates, and marketing communications relating to the Company and its services, including promotional messages to you (or the organization you represent).
- To enhance efficiency and facilitate service delivery in order to improve the quality and convenience of the services provided to you.
- For other purposes relating to the Company's business operations, such as research, preparation of statistics relating to the capital market, service development, targeted marketing and advertising, as well as the delivery of content, public relations, activities, and appropriate recommendations to ensure that services are tailored to your interests.
- To record images, audio, and/or video, including photographs, video recordings, and voice recordings of service interactions.

(C) For human resources management purposes, to enable the Company to make appropriate and informed decisions in recruitment and the overall management of its personnel.

- To assess qualifications and conduct recruitment and selection processes, including hiring or appointment as employees, staff, interns, and/or selection for scholarship recipients (as applicable), as well as for other administrative purposes relating to recruitment and internship applications, improvement of recruitment and selection systems, and workforce planning of the Company.
- To administer payroll, compensation, and benefits in accordance with your employment contract.
- To perform obligations under the employment contract and to comply with applicable laws, including accounting and tax record-keeping, withholding tax, labor protection, occupational safety, health and working environment management, as well as the administration of social security funds and provident funds for your benefit.
- To manage training, provision of equipment, facilities, and employee welfare for your benefit.

(D) For procurement purposes and to maintain a good working relationship between the Company and you (or the organization you represent).

- To verify information and qualifications and to conduct the Company's procurement procedures, including the recording of images, video and audio, and voice recordings of communications.

- To perform obligations under contracts entered into with you (or the organization you represent) for the procurement of goods or services, including contacting you for contract administration between the Company and you (or the organization you represent), obtaining goods or services, managing warranties, and making or collecting payments for goods, services, and related expenses (if any).
- To manage the relationship between the Company and you (or the organization you represent).
- To comply with applicable laws, including accounting and tax record-keeping and withholding tax obligations.

(E) For Security and Safety Purposes

- To monitor and verify the use of the Company's services in order to enhance security standards, and to manage and protect the Company's information technology infrastructure.
- Provision of Wi-Fi services: In this regard, the Company processes personal data including national identification number, IP address, device identifier, and usage date, which shall be retained for a period of ninety (90) days in accordance with the Computer-Related Crime Act.
- Provision of utility system information services: In this regard, the Company processes personal data including company name, name-surname, telephone number, and email address solely for the purpose of providing the Company's services.
- To control access to buildings and premises and to ensure the safety and security of the Company's personnel, as well as the protection of assets and information located or stored within the Company's buildings and areas, including monitoring and supervising access to buildings, secured areas, restricted rooms, information technology infrastructure, operational systems, and other areas (collectively, the "Premises"). This is to prevent unauthorized access and to prevent, detect, and investigate security-related incidents, such as unauthorized entry, theft, fire, or physical harm.
- To record images and/or video via closed-circuit television (CCTV), including photographs and video recordings.

5.2 As the personal data to be processed by the Company for the Specified Purposes under Clause 5.1 above, in particular those relating to compliance with legal obligations, contractual performance, or necessity for entering into a contract with you, is necessary for achieving such purposes, your failure to provide such personal data may result in legal implications, or may prevent the Company from performing its obligations under a contract with you or from entering into a contract with you (as the case may be). In such circumstances, the Company may be required to refuse to enter into a contract with you or to suspend or terminate the provision of services to you, whether in whole or in part.

5.3 In the event that the Company intends to use your personal data for purposes other than those specified above, the Company shall provide an additional notice to explain such use. You are advised to review such additional notice in conjunction with this Policy.

ข้อ 6. Disclosure of Personal Data

6.1 The Company may disclose your personal data, for the Specified Purposes and in accordance with applicable laws, to the following persons or entities:

(1) Pinthong Industrial Park Public Company Limited and the Pinthong Group, including their employees, staff, directors, managers, or relevant personnel, on a need-to-know basis and to the extent necessary for the processing of your personal data.

(2) Government authorities or regulatory agencies as required by law, such as the Industrial Estate Authority of Thailand, the Securities and Exchange Commission, the Department of Business Development, the Revenue Department, the Land Department, and other relevant authorities.

(3) Authorities requesting disclosure of personal data under legal powers, such as for litigation or legal proceedings, or in connection with legal processes, including the Anti-Money Laundering Office, the National Anti-Corruption Commission, the Royal Thai Police, the Department of Special Investigation, the Office of the Attorney General, and the Courts.

(4) Business partners, counterparties, service providers, recipients of services, and data processors appointed by the Company to perform duties, provide services, or manage personal data on behalf of the Company, such as for system development, maintenance of information security standards, payment systems, accounting audits, human resources management, or other services that may be beneficial to you.

6.2 The disclosure of your personal data to any third party shall be carried out only for the Specified Purposes or for other purposes permitted by law. Where consent is required by law, the Company shall obtain your explicit consent prior to such disclosure.

6.3 In the event that the Company discloses your personal data to any third party, the Company shall implement appropriate measures to protect such disclosed personal data and to ensure compliance with applicable standards and obligations under the Personal Data Protection Laws.

7. Retention Period of Personal Data

7.1 The Company shall retain your personal data for as long as necessary to achieve the Specified Purposes for which such personal data is processed. The retention period may vary depending on the purposes of collection and processing of each category of personal data.

7.2 The Company shall retain personal data for the period prescribed by applicable laws and, where appropriate, in accordance with relevant business practices for each category of personal data. Upon expiration of such period, the Company may delete or destroy such personal data from its storage or systems without prior notice to you.

8. Rights of Data Subjects

As a data subject, you have the following rights in relation to your personal data, subject to the rules, procedures, and conditions as prescribed by the Personal Data Protection Laws. If you wish to exercise any of your rights, you may contact the Company using the contact details provided in Clause 11 (Contact Information) below.

8.1 Right of Access

You have the right to access your personal data and to request that the Company provide you with a copy of such personal data, subject to a fee for duplication as prescribed by the Company. You also have the right to request that the Company disclose the source of your personal data where such data has been collected, used, or disclosed without your consent, to the extent permitted by the Personal Data Protection Laws.

8.2 Right to Data Portability

You have the right to obtain your personal data in a format that is readable or commonly used by automated tools or devices, and to request that such personal data be transmitted or transferred to another data controller or to yourself, unless it is technically infeasible to do so, in accordance with the Personal Data Protection Laws.

8.3 Right to Object to Processing

You have the right to object to the processing of your personal data. The Company shall comply with such request where:

(1) the Company relies on legitimate interests of the Company or of a third party, or for the performance of a task carried out in the public interest, unless the Company can demonstrate compelling legitimate grounds that override your fundamental rights, or where the processing is necessary for the establishment, exercise, or defense of legal claims; or

(2) your personal data is processed for direct marketing purposes; or

(3) your personal data is processed for scientific, historical, or statistical research purposes, unless such processing is necessary for the performance of a task carried out in the public interest by the Company.

In the event that you object to the processing, please specify whether you request the deletion of your personal data or the restriction of such processing.

8.4 Right to Erasure

You may request that the Company delete or anonymize your personal data in the following circumstances:

- (1) where your personal data is no longer necessary for the purposes for which it was collected or processed;
- (2) where you withdraw your consent on which the collection and processing of your personal data is based, and the Company has no legal basis to continue processing such personal data;
- (3) where you have objected to the processing pursuant to Clause 8.3; or
- (4) where your personal data has been unlawfully collected or processed.

The above shall not apply where the processing of personal data is necessary for the exercise of freedom of expression, for the performance of a task carried out in the public interest, for the establishment, compliance with, or exercise of legal claims, for the defense of legal claims, or for compliance with applicable laws.

8.5 Right to Restrict Processing

You have the right to request the restriction of the processing of your personal data in the following circumstances:

- (1) where the Company is in the process of verifying the accuracy of your personal data as requested by you;
- (2) where your personal data is required to be erased or destroyed under Clause 8.4, but you request restriction of processing instead;
- (3) where the Company no longer requires your personal data for processing purposes, but you require the retention of such personal data for the establishment, exercise, or defense of legal claims; or
- (4) where the Company is in the process of demonstrating compelling legitimate grounds under Clause 8.3(1) or verifying the grounds under Clause 8.3(3) in order to reject your objection under Clause 8.3.

8.6 Right to Rectification

You have the right to request that your personal data be corrected to ensure that it is accurate, up to date, complete, and not misleading.

8.7 Right to Withdraw Consent

Where the Company relies on your consent for the processing of your personal data, you have the right to withdraw such consent at any time during the period in which your personal data is retained by the Company.

8.8 Right to Lodge a Complaint

If you have any concerns or questions regarding the processing of your personal data by the Company, please contact the Company using the contact details provided in Clause 11 (Contact Information) below. In the event of a violation of the Personal Data Protection Laws, you have the right to lodge a complaint with the Personal Data Protection Committee.

The Company shall use its best efforts, within the capabilities of its systems, to facilitate and respond to your requests without undue delay, unless it is determined that such requests would impose an excessive burden on the Company, risk infringing the rights and freedoms of others, be contrary to applicable laws, or be impracticable to comply with.

9. Security Measures for Personal Data Protection

The Company has implemented and/or selected appropriate systems for the storage of personal data, incorporating suitable mechanisms and technical measures, and has established security measures in accordance with the Personal Data Protection Laws and other applicable laws. The Company also restricts access to your personal data by its employees, staff, and agents on a need-to-know basis, in order to prevent unauthorized access, use, disclosure, alteration, or destruction of your personal data.

10. Links to Third-Party Websites, Products, and Services

The Company's services may contain links to third-party websites, applications, products, and services. Such third parties may collect certain information regarding your use of their services. This Policy applies solely to the processing of personal data for the Specified Purposes by the Company. The Company shall not be responsible for the security or privacy of any personal data collected by such third-party websites, applications, products, or services, even if you access them via links provided through the Company's services. You are advised to exercise caution and review the privacy notices or policies of such third parties before providing any personal data.

11. Contact Information

If you have any questions regarding this Policy or wish to exercise your rights as set out herein, please use the contact form available on the Company's website at www.pinthongindustrial.com. Alternatively, you may contact the Company using the following details:

- Email: pinthong@pinthongindustrial.com
- Telephone: +66 38 296 334-337
- Fax: +66 38 296 333
- Postal

Address: Pinthong Industrial Park Public Company Limited
789 Moo 1, Nong Kho-Laem Chabang Road,

Nong Kham Subdistrict, Si Racha District,
Chon Buri 20230, Thailand

12. Governing Law

This Policy shall be governed by and construed in accordance with the laws of Thailand, and the Thai courts shall have jurisdiction over any disputes arising out of or in connection with this Policy.

13. Changes to this Policy

The Company may amend this Policy from time to time to reflect any changes in the processing of your personal data and to ensure compliance with the Personal Data Protection Laws and other applicable laws. The Company will notify you of any material changes through appropriate channels. However, you are encouraged to review this Policy periodically.

This Policy shall be effective from 25 February 2022, by the approval of the Board of Directors at its Meeting No. 1/2022.

- Mr. Prasan Tanprasert -

Chairman of the Board of Directors

Pinthong Industrial Park Public Company Limited