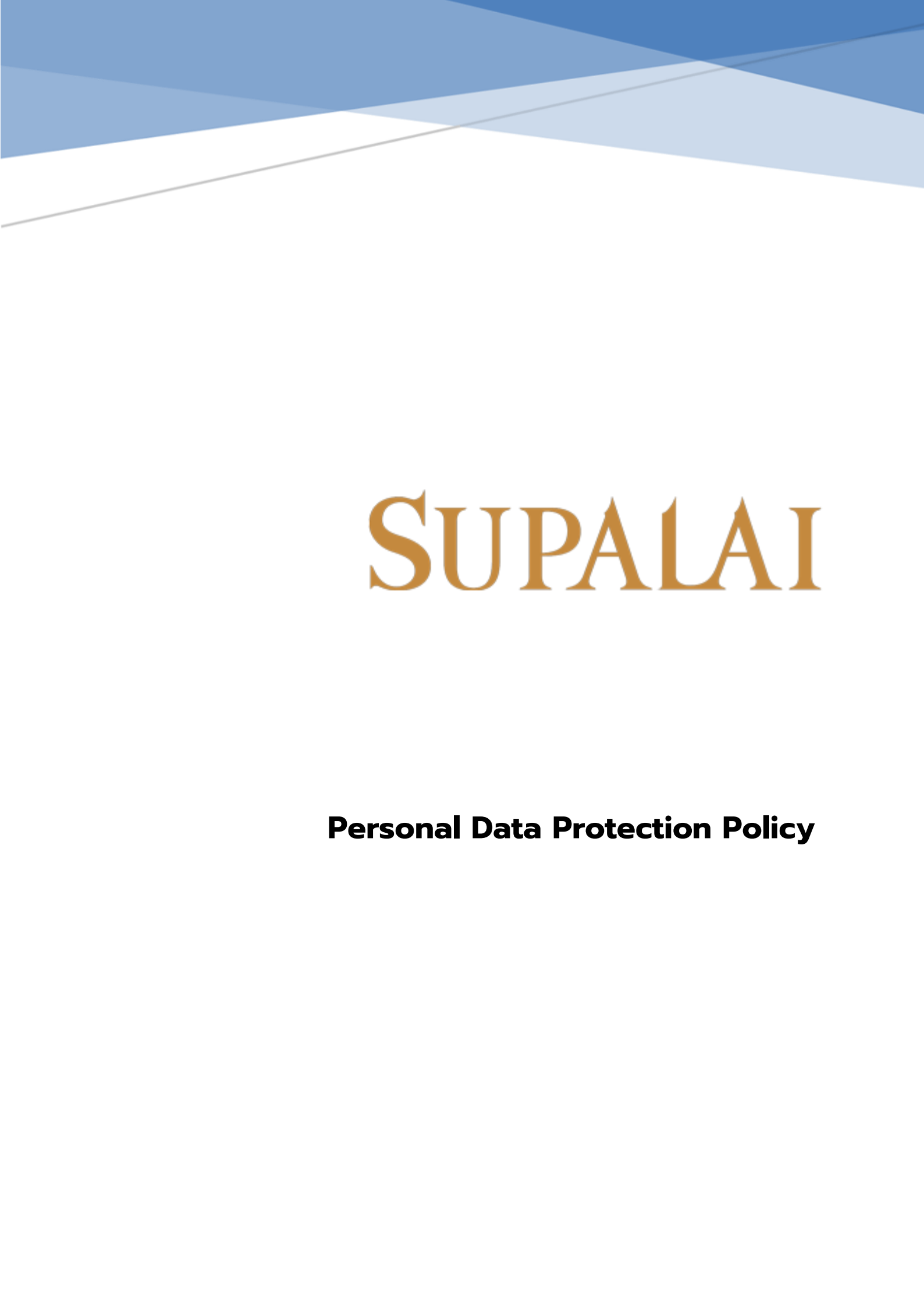




SUPALAI

Personal Data Protection Policy

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1. Importance

Supalai Public Company Limited ("the Company") recognizes the importance of personal data. To comply with the Personal Data Protection Act B.E. 2562 (2019) and other relevant laws, including any future amendments ("the Personal Data Protection Law"), the Company has established this Personal Data Protection Policy ("the Policy") to explain details regarding the collection, use, and disclosure of personal data, as well as the rights of data subjects in accordance with applicable laws and international standards.

2. Scope of Policy

This Policy applies solely to the collection, use, or disclosure of personal data by Supalai Public Company Limited and its subsidiaries. The Policy and operational guidelines shall be reviewed at least once a year, or when deemed appropriate.

3. Objectives

3.1 To ensure that transactions are secure, reliable, and that the personal data of all personnel, customers, business partners, and strategic alliances are protected.

3.2 To prevent damages arising from the fraudulent exploitation or misuse of personal data.

4. Definitions

"Personal Data" means any information relating to a person which enables the identification of that person, whether directly or indirectly, but not including the information of the deceased.

"Sensitive Personal Data" means personal data pertaining to race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disabilities, trade union information, genetic data, biometric data, or any other data that may cause unfair discrimination against or affect the data subject in a similar manner as prescribed by the Personal Data Protection Law.

"Data Subject" refers to a natural person who is the owner of the personal data, including customers, business partners, service providers, shareholders, directors, employees, staff, visitors, and any other natural person whose personal data the Company collects, uses, or discloses.

"Data Controller" refers to a person or legal entity who has the authority to make decisions regarding the collection, use, or disclosure of personal data.

"Data Processor" refers to a person or legal entity who carries out the collection, use, or disclosure of personal data according to the instructions or on behalf of the Data Controller. Such person or legal entity shall not be a Data Controller.

"Data Protection Officer" refers to a natural person or legal entity who is responsible for supervising, advising, auditing the operations of the Data Controller and Data Processor, and coordinating and cooperating with the Office of the Personal Data Protection Commission.

"Consent" means an expression of intent by the Data Subject to agree to the collection, use, or disclosure of their Personal Data, which may be in written or electronic form, unless, by its nature, consent cannot be requested by such methods.

"Privacy Notice" means detailed information to inform the Data Subject about the collection, use, or disclosure of Personal Data, including the management of Personal Data, the rights of the Data Subject, the Personal Data retention period, the destruction of Personal Data, and the contact channels for the Data Protection Officer.

"Rights of the Data Subject" means the rights of the Data Subject to manage their Personal Data, such as the right to access Personal Data, the right to request that their Personal Data be sent or transferred to another person, the right to object, the right to request disclosure of the acquisition of their Personal Data, the right to request the deletion, destruction, or suspension of the use of their Personal Data, and the right to update their Personal Data.

"Personal Data Breach" means the leakage or violation of security measures regarding Personal Data, resulting in damage, loss, alteration, or unauthorized disclosure.

"The Office" means the Office of the Personal Data Protection Commission, which is responsible for Personal Data protection activities, performing academic and administrative work for the Commission, with the Secretary-General of the Office of the Personal Data Protection Commission as the chief executive.

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"Legal Basis" means the legally recognized grounds for collecting Personal Data, under the Personal Data Protection Law.

5. Duties and Responsibilities

5.1 Board of Directors:

- To establish Personal Data Protection policies and guidelines.
- To oversee the practical implementation of the policies.

5.2 Executive:

- To establish regulations and measures for Personal Data storage appropriate to the context of each company, in accordance with policies, guidelines, laws of each country where the company operates, and international standards.
- To establish a responsible structure to oversee operations in accordance with regulations.
- To establish a system for selecting individuals or legal entities with standard and legally compliant Data Protection systems in cases where the company hires other individuals or legal entities to handle Personal Data.
- To oversee compliance with policies, guidelines, and regulations, and to develop and improve operational methods for efficiency, including regular reporting of results.

5.3 Data Protection Officer:

- To control and audit the company's operations to ensure compliance with the law, including organizing awareness-raising activities and training related to Personal Data operations.
- To provide advice and recommendations to the Board of Directors, executives, and employees on correct legal compliance.
- To serve as the central contact point for Personal Data matters, protecting the rights of Data Subjects, and coordinating and cooperating with the Office of the Personal Data Protection Commission.
- To maintain the confidentiality of Personal Data learned or acquired during the performance of duties.

5.4 Employees:

- To use Personal Data with caution and strictly comply with the law and company regulations.
- To immediately notify the Data Protection Officer upon discovering a Personal Data breach or violation.
- If any act is observed that may constitute a violation of this policy, to report it through the company's reporting and complaint channels.

6. Collection of Personal Data

The Company will collect Personal Data only to the extent necessary under the legitimate purpose of the Data Controller.

*Personal Data

Personal Data Category	Details and Examples
Personally Identifiable Information	Full name, Gender, Age, Date of birth, National ID number, Photograph, etc.
Contact Information	Postal address, Email address, Telephone number (including landline and mobile numbers), Social media accounts such as LINE ID, Facebook ID, Google ID, etc.
Financial Information	Credit/debit card details such as cardholder name, card number, expiry date, issuing bank, Bank account details, Issuing tax invoices, etc.

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Technical Information	IP Address/Mac Address, Data collected via Cookies, Website usage logs or tracking of usage behavior from Session ID, Type and version of web browser, etc., Other data such as CCTV footage.
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6.1 Sensitive Personal Data

The Company will collect Sensitive Personal Data only as necessary. If the Company needs to process Sensitive Personal Data for any reason, the Company will request explicit consent for assessment and voluntary processing, such as for security purposes. Such processing will be carried out according to legal procedures and methods.

6.2 Personal Data of Minors

The Company will not request or collect Personal Data from minors who have not reached the age of majority. If the Company discovers that it has unintentionally collected Personal Data from a minor, the Company will delete the minor's Personal Data from the storage system immediately. However, the Company may collect Personal Data about minors from parents or guardians directly and with their explicit consent.

6.3 Sources of Personal Data

The Company will collect Personal Data directly from the Data Subject. However, if the Company collects Personal Data from sources other than the Data Subject directly, the Company will promptly notify the Data Subject and no later than thirty days from the date of collection and receive consent from the Data Subject, unless the Company has the right to collect or act lawfully, such as Personal Data sources obtained from public records and non-public records that the Company is entitled to collect under the law, or Personal Data sources obtained from government agencies or regulatory agencies exercising legal authority.

Principles of Personal Data Collection and Purposes: The Company collects Personal Data only as necessary for the legitimate purposes of the Data Controller under the following Legal Bases:

Legal Basis for Data Collection	Purposes
Consent	To collect, use, or disclose our Personal Data that requires consent, having notified the purpose of the collection, use, or disclosure of Personal Data before or at the time of requesting consent.
Contract	For the purpose of initiating or entering into a contract, or performing a contract with business clients/partners.
Legal Obligations	For the performance of the Company's legal duties as a Data Controller.
Vital Interests	To prevent or suppress danger to the life, body, and health of a person.
Public Tasks	Is necessary for the performance of duties in carrying out tasks for the public benefit of the Data Controller, or performing duties in exercising state power delegated to the Data Controller, as prescribed by the Commission.
Legitimate Interests	Is necessary for the legitimate interests of the Data Controller or of other individuals or legal entities who are not the Data Controller. Such interests must be more important to the Data Subject than the fundamental rights in the Personal Data of the Data Subject.

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Historical Document Research Statistics	or	For purposes related to the preparation of historical documents or archives, or related to research or statistics studies.
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7. Disclosure of Personal Data

The Company will not disclose and transfer your Personal Data to Data Processors or third parties unless explicit consent is received from you, or in the following cases:

7.1 To achieve the purposes specified in this Personal Data Protection Policy, the Company may need to disclose or share only necessary data to business partners, service providers, Data Processors, or third parties. The Company will prepare a Data Processing Agreement (DPA) as required by law.

7.2 The Company may disclose and/or transfer your Personal Data to government agencies, law enforcement agencies, courts, officials, state agencies, law enforcers, government officials, or authorized agencies to comply with lawful orders or requests, such as the Social Security Office, Revenue Department, Legal Execution Department, etc.

7.3 The Company may disclose and/or transfer your Personal Data to internal auditors, auditors, independent directors' advisors, or other individuals, in cases where the Company has reasonable grounds to believe that it is necessary to perform duties under the law or legal regulations, or to protect the Company's rights, the rights of other persons, or for the safety of individuals, or to inspect, prevent, or deal with fraud, or security or safety issues.

7.4 In the event that you are a shareholder of the Company and have submitted the following documents:

7.4.1 Form for submitting questions in advance before the Annual General Meeting of Shareholders.

7.4.2 Form for proposing matters to be included in the agenda of the Annual General Meeting of Shareholders.

7.4.3 Form for proposing names of persons to be considered for election as directors at the Annual General Meeting of Shareholders.

7.4.4 Form for information of persons nominated for consideration for election as directors at the Annual General Meeting of Shareholders.

The Company may disclose your information to the Board of Directors to prepare reports and documents related to the Company's Annual General Meeting of Shareholders and present them to the Annual General Meeting of Shareholders, including specifying Personal Data in reports and documents disclosed to the public.

8. Cookie Policy and Use of Cookies

When you visit the Company's website, the Company will automatically collect certain information from you through the use of cookies.

Cookies are specific data to your computer when you visit a website, and cookies will store or track information about your website usage and use it to analyze trends, manage the website, track the movement of website users, or to remember user settings.

Some types of cookies are necessary because without these necessary cookies, the web page may not function properly. Other types of cookies allow the Company to improve your website experience, customize content to your needs, and make browsing more convenient because cookies remember usernames (in a secure way) as well as remember your language settings.

Normally, most internet browsers will allow you to set whether you accept cookies or not. If you choose not to be tracked by cookies or delete cookies, it may affect your website usage, and without cookies being stored, the use of certain functions or websites may be limited.

In addition, third parties may use cookies through the Company's website to present advertisements related to your interests based on your website browsing activity history. These third parties may collect your history or other information to know how you access the website and the web pages you visited after leaving the Company's website. The information collected through these automated systems may be related to the personal.

Data you previously provided on the Company's website. You may also be subject to the Personal Data Protection Policy or Cookie Policy of those third parties. The Company recommends that you read the Personal Data Protection Policy or Cookie Policy of those third parties to learn more about how those third parties collect, use, or disclose your Personal Data.

9. Rights as a Data Subject

Under the provisions of the law and legal exceptions, you have the following rights:

- **Right to be informed**, which is a fundamental right that everyone must be informed.
- **Right to access Personal Data**. You have the right to request access to and receive a copy of your Personal Data under the responsibility of the Data Controller or request disclosure of the acquisition of your Personal Data that you did not give consent for.
- **Right of Rectification**. You have the right to request that the Personal Data that the Company has collected, used, or disclosed about you be corrected, updated, complete, and not cause misunderstanding.
- **Right to data portability**. You have the right to request to receive your Personal Data that the Company has about you in an organized format that can be read in electronic format and to send or transfer such Personal Data to another Data Controller, which must be (a) Personal Data that you have provided to the Company, and (b) cases where the Company has received your consent to collect, use, or disclose your Personal Data or to perform a contract that the Company has with you. However, if your exercise of rights violates the rights or freedoms of others, or if the Company must use your Personal Data for public interest or to comply with the law, the Company has the discretion to deny your request.
- **Right to object to Personal Data Processing**. You have the right to object to the collection, use, or disclosure of your Personal Data, as stipulated by applicable law.
- **Right to Restriction of Processing**. You have the right to request the suspension of the use of your Personal Data temporarily in cases where it is under investigation following a request to exercise rights, request to correct Personal Data, or objection to the collection, use, or disclosure of your Personal Data.

- **Right to withdraw consent.** You have the right to withdraw your consent for the Company to collect, use, or disclose your Personal Data. In the case of withdrawing consent, the Data Controller must inform the Data Subject of the effects of such withdrawal.
- **Right to Erasure.** You have the right to request that the Company delete, destroy, or anonymize your Personal Data that the Company has collected, used, or disclosed, unless the Company's retention of such Personal Data is for compliance with the law or for the establishment, exercise, or defense of legal claims.
- **Right to Lodge a Complaint.** You have the right to file a complaint with the government agency related to Personal Data Protection if you believe that the Company has not complied with the Personal Data Protection Law.

10. Security Measures

The Company provides appropriate Personal Data security measures, which include administrative safeguards, technical safeguards, and physical safeguards regarding access to or control of access to Personal Data to maintain the confidentiality, integrity, and availability of Personal Data, and to prevent loss, access, use, alteration, modification, or disclosure of Personal Data without authorization or unlawfully, as stipulated by applicable law.

The Company provides measures to control access to Personal Data and the use of devices for storing and processing Personal Data that are secure and appropriate for the collection, use, and disclosure of Personal Data. In addition, the Company has established measures to restrict access to Personal Data and the use of devices for storing and processing Personal Data by defining user access rights, rights to authorize assigned persons to access data, and user responsibilities to prevent unauthorized access, disclosure, or copying of Personal Data or theft of Personal Data storage or processing devices. Furthermore, the Company has implemented measures for auditing access, modification, deletion, or transfer of Personal Data, consistent with the methods and media used in the collection, use, or disclosure of Personal Data.

11. Personal Data Retention Period

The Company will retain your Personal Data for the period necessary for the purposes for which the Company has informed you, as detailed in the Policy, Privacy Notices, or relevant laws. Once the period has elapsed and your Personal Data is no longer necessary for such purposes, the Company will delete or destroy your Personal Data or anonymize your Personal Data according to standard Personal Data deletion or destruction procedures. However, in the event of a dispute, exercise of rights, or litigation related to your Personal Data, the Company reserves the right to retain the data until the dispute has a final order or judgment.

12. Policy Amendments

This Policy may be revised or amended as appropriate to comply with the Personal Data Protection Law or other relevant laws. Therefore, it is recommended that you check for changes to this Policy periodically.

13. The Company's Privacy Notices comprise:

13.1 Privacy Notice for Customers or Service Recipients

13.2 Privacy Notice for Business Partners and Related Parties

13.3 Privacy Notice for Job Applicants and Related Parties

13.4 Privacy Notice for Personnel and Related Parties

13.5 Privacy Policy for Shareholders, Directors, and Advisors

13.6 Personal Data Retention Policy and Personal Data Deletion or Destruction Policy

13.7 Cookie Policy

The Company must provide Privacy Notices and Policies to Data Subjects to inform them of details before collecting Personal Data in each instance, unless the Data Subject is already aware of the details.

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14. Personal Data Protection Guidelines include:

14.1 Guidelines for Compliance with the Personal Data Protection Act B.E. 2562

14.2 Guidelines for Data Subject Requests

- Regulation on Managing Requests from Data Subjects
- Data Subject Request Form
- Register of Data Subject Rights Requests
- Notification of the Outcome of Data Subject Requests

14.3 Guidelines for Notifying Personal Data Breaches

- Regulation on Notifying Personal Data Breaches
- Form for Reporting Personal Data Breach or Leakage
- Register of Personal Data Breach Events
- Notification of Personal Data Breach Event
- Explanation of Personal Data Breach Event

14.4 Guidelines for Disclosing Personal Data to External Entities

- Guidelines for Disclosing Personal Data to External Entities
- Regulation on Guidelines for Supervising External Data Processors

14.5 Guidelines for Data Protection Impact Assessment and Risk Assessment

- Regulation on Data Protection Impact Assessment and Risk Assessment
- Data Protection Impact Assessment Report

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15. Data Recording or Reporting Items Consistent with the Personal Data Protection Act B.E. 2562 include:

- 15.1 Personal Data Inventory Report
- 15.2 Analysis List for Grouping Personal Data (Data Classification)
- 15.3 Record of Processing Activity (RoPA) Report

16. Personal Data Protection Policies and Guidelines shall be in accordance with the documents attached to this announcement:

- 16.1 Privacy Notice
- 16.2 Personal Data Protection Guidelines

17. Cases of Non-Compliance with the Personal Data Protection Policy

Failure to comply with the guidelines, policies, or Personal Data Protection measures as required by law for officers or employees of the Company Group may result in disciplinary action under Company regulations. For Data Processors, it may result in a breach of the Data Processing Agreement and may be subject to penalties as prescribed under the Personal Data Protection Act B.E. 2562, including subordinate laws, rules, regulations, and related orders.

Contact Details for Inquiries, Complaints, Reporting of Breaches

Supalai Public Company Limited

1011 Supalai Grand Tower, Rama 3 Rd.

Chong Nonsi, Yannawa, Bangkok 10120

Telephone 02-725-8888

Email dpo@supalai.com

Website www.supalai.com

Announced on April 1, 2025

Prateep Tangmatitham

(Mr. Prateep Tangmatitham)

President