



-English Translation-

PRIVACY POLICY PICO (THAILAND) PCL AND ITS SUBSIDIARIES

Pico (Thailand) Public Company Limited (“the Company”) always values and prioritizes the protection of personal data protected by law, which is owned by clients, employees, contractors, and all stakeholders. The Company has always enforced compliance at a high level to prevent the improper exploitation of personal information, or disclosure of personal information that could cause damage or lead to individual identification without consent. It is considered a violation of the individual and the Company leading to disciplinary action and legal offense action. Hence, the Company has issued this Privacy Policy to serve as a guideline for the practice of data processing, data collection, data usage, and data disclosure, to ensure that personal data is protected in accordance with the Personal Data Protection Act B.E. 2562 (2019) as well as any related laws, as per the following details.

1. Objectives

The Company has developed the Privacy Policy to serve as the personal data management direction of the Company, including data collecting, data usage, and data disclosure, and to control the data protection of internal operations in accordance with the governing law.

2. Definition

- "Personal Data" means any information that can lead to individual identification, whether directly or indirectly.
- "Data Controller" means the authority that determines the means and purpose of collecting, using, and sharing personal data.
- "Data Processing" means the procedure for data collection, data usage, or data disclosure.
- "Data Processor" means any individual or party that gathers, uses, or shares personal information as directed by the data controller. In this regard, the data processor shall be prohibited to be a data controller.

3. Scope of Policy Enforcement

- 3.1 This Privacy Policy shall apply to the Company and its employees, including its subsidiaries.
- 3.2 This Privacy Policy shall cover all data processing, starting from data collection, data usage, and data disclosure, as well as data deletion or data destruction.
- 3.3 The Privacy Policy shall protect the personal data of all data owners (Data Subjects) such as clients, contractors, employees, directors etc.

4. Data Collection Objectives

- 4.1 Data collection shall be carried out only for a specific purpose and such purpose must be notified to the Data Subject before or at the time of collection.
- 4.2 The objectives of data collection shall be based on the categories of the Data Subject specified in the Company's Personal Data Protection Regulations and Practices.

In the event that the data has been collected beyond the objectives set forth in the Personal Data Protection Regulations and Practices, the Data Subject shall be notified of the collecting purpose, the collected data, the data usage, or the data disclosure before or at the time of collection.

5. Data Processing

5.1 Type of Data

The Company shall collect data according to the specified purpose, categorize the data in accordance with the type of Data Subject, and indicate the type of collected data conforming to the category of the Data Subject stated in the Personal Data Protection Regulations and Practices, such as an individual identification or the employee's identity, e.g., name, surname, ID number, address, telephone number, payroll bank account, etc.

5.2 Minors and the Incompetent Personal Data

The Company shall not collect data from minors or incompetent persons without receiving consent from parents or the curator of the incompetent person, except as required by law stated in Section 22, Section 23, or Section 24 of the Civil and Commercial Code that allows minors to give their consent on their own.

5.3 Data Collection

Collection of personal data must be done for a specific purpose and only to the extent necessary in accordance with the objective framework, or for the benefits directly involved with the purpose of data collection. The Data Subject must be informed in advance or during the time of the data collection process.

Collection of information must be given consent by the Data Subject except as permitted by law, e.g., general information that does not require consent on a contract basis or in accordance with the law, such as submitting payroll information to the Revenue Department, or sensitive information that does not require consent on the basis of necessity for the prevention or suppression of harm to life, physical, or health, for example, health information on preventing infective diseases, etc.

The Company shall collect data directly from the Data Subject, except as specified by law.

5.4 Data Usage or Data Disclosure

The use or disclosure of personal data must be carried out in accordance with the purposes or necessity for the benefit directly related to the purposes of data collection, and must obtain the consent of the Data Subject in advance or during the time of the data collection, except as required by law, e.g., the information that is legally disclosed to the public in order to prevent or suppress harm to life, physical, health, etc.



5.5 Data Transfer

The Company shall not transfer data without consent of the Data Subject, except as required by law.

In the event that the Company is required to send or transfer personal data abroad, the Company shall evaluate the destination country on having adequate personal data protection standard.

The Company may transfer personal data to overseas subsidiaries, which must exercise data protection similar to the Personal Data Protection Regulations and Practices and not less than that set out in this Privacy Policy.

5.6 Data Deletion and Data Destruction

The Company shall define the period for deletion or destruction of each type of data in the Personal Data Protection Regulations and Practices.

5.7 Hired or Outsourcing of Data Processing

The Company shall particularly process data according to the hiring scope for the purposes of collection, usage, and disclosure, including deletion and destruction.

The Company shall establish guidelines to control data processing outsources to protect personal data not less than the Company's data protection standard.

In the case of being hired or outsourcing personal data processing to be the personal data processor, the Company shall enter into a data processing contract to control the operation and outsourcing of personal data processing and to ensure the protection of personal data as specified in the contract.

6. Personal Data Protection Measures

The Company will determine personal data protection measures in accordance with the level of data risk of both data in the document format and data in the online system. The Access Authorization is enforced at a minimum to prevent personal data loss, access, usage, alteration, modification, or disclosure without authorization or misrepresentation.

7. Inspection and Management of Violation

- 7.1 The Company shall appoint measures to regularly inspect the personal data protection system to ensure that the personal data remains secure.
- 7.2 The Company shall issue guidelines for handling violations to ensure that violations will be resolved immediately by the Data Protection Officer (DPO).
- 7.3 If a violation of personal data collected by the Company occurs, the Company shall notify the breach to the Office of the Personal Data Protection Commission (PDPC) without delay within seventy-two hours from the time of cause acknowledgment, except such breach has no risk of affecting the rights and freedoms of an individual. If a violation has a high risk of affecting the rights and freedoms of an individual, the violation must be reported to the Data Subject along with the remedy.

8. Rights of Data Subject

The Company is obliged to ensure and protect the following rights of the Data Subject.

- 8.1 The right to access and obtain a copy of the relevant personal data under the responsibility of the Data Protection Officer (DPO) or request the disclosure of the acquisition of such data collected without Data Subject's consent.
- 8.2 The right to obtain his/her own personal data from the Data Protection Officer (DPO).
- 8.3 The right to object to the collection, use, or disclosure of his/her own personal data at any time.
- 8.4 The right to request the Data Protection Officer (DPO) to delete or destroy his/her own personal data or transform such data into unidentified data.
- 8.5 The right to request the Data Protection Officer (DPO) to suspend the use of his/her own personal data.
- 8.6 The right to request that his/her own personal data be kept accurate, update, complete, and not misleading.

The Company has established procedures for the exercise of rights management of the entire process, from requesting data access, authentication, approval, and notification of the operation results, to ensure that the Data Subject is able to exercise his/her rights as intended. Details are stated in the procedures on exercising the rights of the Data Subject.

9. Complaints

In the case that the Company has not complied with the Personal Data Protection Act, any complaints could be made to the Company through the contact channels set out in Article 13 of this Policy.

10. Compilation of Manual and Practice Procedures

- 10.1 The Company shall establish requirements and procedures under this Privacy Policy to serve employees as a practice guideline.
- 10.2 Manuals, requirements, procedures, and all forms set forth in accordance with the Privacy Policy, dated March 3, 2020, which were in effect before this announcement, shall continue to be effective.

11. Penalty

Any violation or failure to comply with the Privacy Policy, manuals, requirements, and procedures, including the Personal Data Protection Act and laws related to the protection of personal data, is subject to disciplinary actions, and further legal actions for an offense against the law.

12. Revision of Policies and Practice Procedures

The Company shall consider amendment to the Privacy Policy as well as manuals, requirements, procedures, and all relevant forms in consideration of the accuracy, appropriateness, adequacy, and efficiency of personal data protection. The revised version will be announced on the Company's website (www.picothai.com).



13. Contact

The Data Subject or any complainant may contact the Company regarding personal data by notifying the Data Protection Officer (DPO) or the representative of the Management of Data Protection System on the following channels.

Pico (Thailand) Public Company Limited
10 Soi Lasalle 56
Bangna Tai, Bangna
Bangkok 10260
Telephone: 02 748 7007
Email: dpo@picothai.com

This policy is approved by the board of directors meeting No. 5/2021 on 8 December 2021 and is effective from 8 December 2021 onward.

A handwritten signature in black ink, appearing to be "Chia Song Heng", written over a faint, stylized graphic element.

Mr. Chia Song Heng
Chairman of the Board
Pico (Thailand) PCL

Note: This Privacy Policy has been amended to include further details for a better understanding of the original policy, the announcement of HR 004/63 dated March 3, 2020. Thus, the original privacy policy is to be canceled and replaced by this Announcement of the Privacy Policy. For Manuals, requirements, procedures, and all relevant forms issued under the original privacy policy shall continue to be effective. More details are located in Drive R:\PDPA.