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Guidelines on Personal Data Protection Policy of IRPC Public Company Limited

(Revised version 2021) Dated 1 April 2021

Chapter 1

Personal Data Protection Policy

For Personnel of IRPC Public Company Limited

1.1 Personal Data Collected by the Company

Personal data collected, used or disclosed by the Company shall include the following:

1) Personal data such as name, last name, name title, gender, date of birth, ID number, passport number, driver's license, marital status, military status, photo, age, job position, including other sensitive personal data such as face recognition, fingerprint, religion, nationality, health record, criminal record, disability record whereby the Company has been granted your informed consent or when deemed necessary as required by law.

2) Contact data such as address, telephone number and e-mail

3) Financial data such as salary, savings account number, other remunerations, credit record, both employees' loan benefits and/or credit with other financial institutions, settlement, and data relating to assets

4) Work- related data such as work permit, employment history, performance evaluation, operation, leave of absence record, illness record, data on the use of IT system and internal websites of the Company.

5) Other personal data such as work experience, education background, training, data of family members, data of the surety (if any) , reference data, picture or voice recordings during operation such as CCTV recording, conversation recording while having conversation with customers or external parties etc.

1.2 Sources of Your Personal Data

The Company may collect your personal data as you have directly provided the Company with your personal data or the Company may receive your personal data from other sources.

In a case where the Company has collected personal data by receiving such data directly, the Company has received such personal data from:

1) Job application procedures by filling in information and providing such information to the Company for consideration on recruitment, registration or filling in job application form to submit to the Company via a specified channel

2) When you access the Company's website

In a case where the Company receives your personal data from other sources; for example,

1) Other persons

2) Public sources such as data from the internet or social media platform etc.

3) Other accompanying data, including associated companies, business group or any persons whom the Company has known or referred you to the Company.

4) Data from the government agency or other related agencies

1.3 Collection, Use or Disclosure of Personal Data Shall be Performed within the Specified Criteria as follows:

The Company shall collect, use or disclose your personal data for various objectives within a legal basis as indicated below:

1.3.1 In a case where you are the Company's employee or a family member or a reference person to whom the employee has referred

1) The Company shall collect, use or disclose your personal data under the contract basis for the following objectives:

- a) To proceed with the tasks relating to employment procedures and steps in preparing the employment contract as well as other contracts relating to the employment such as non-disclosure agreements, policy and working regulations etc.
- b) To consider risk factors of employees' operation, resulting from health check-ups after starting their operation (proceed within 30 days, starting from the first day of operation)
- c) To communicate with employees, performance evaluation
- d) To proceed with remunerations, welfares and benefits for employees as well as to handle matters regarding the physical health of the employees such as health insurance, annual health check-up, employees' compensation etc.
- e) To consider vacation leave, personal leave and sick leave
- f) To disclose or submit data to third parties in providing for employees' welfare such as insurance companies, asset management companies, bank counterparty etc.

- g) To proceed with resignation procedures and steps, termination of employment, compensation, welfare after employment termination

2) The Company shall collect, use or disclose your personal data under the consent basis to achieve the following objectives:

- a) To check for criminal record
- b) To check for physical health and to collect health data
- c) To disclose personal data, including health data and medical record to the insurance company and the Company Group or the associated companies of the insurance company, including other external parties to achieve the Company's established objectives relating to the insurance policy

3) In addition, the Company has collected, used or disclosed your personal data under its legal obligation or for the necessity to constitute a legal claim, compliance or exercising of legal rights or defense of legal rights, such as maintaining employees leave record from a medical certificate or evaluating employees potential etc. Additionally, to disclose or report data to the government agency as stipulated by law such as Social Security Office, Revenue Department, Health Office, Natural Resources and Environmental Policy and Planning etc., including upon receipt of the court's order, court's summons, or government's notice to act according to legal authority of such agency.

4) The Company shall collect, use or disclose your personal data within legal basis for the following objectives:

- a) For potential development of personnel and training/ seminar/ work-related visit, knowledge endorsement in various fields for employees
- b) For risk management and governance on personnel management such as an analysis of the number of employees, effectiveness evaluation of the organization, including information disclosure to the contractor or consultant in the demographic survey etc.
- c) For risk management, monitoring, audit and human resources management
- d) For the prevention and review of various activities such as embezzlement, money laundering, criminal acts or any other illegal acts, including disclosure of personal data to major shareholders for internal audit and prevention of any misconducts or illegal acts

- e) For an audits performed by major shareholders or other relevant agencies, investigations or examinations or for the constitution or exercising of legal claims or to use as an evidence in any legal proceedings
- f) For the safety of building areas and facilities, including an exchange of access card before entering the Company's premises and CCTV recording.

1.3.2 In a case where you are the director or senior executive of the Company

1) The Company shall collect, use or disclose your personal data under contract basis for the objectives to contact, handle or carry out activities in accordance with the duties as the director and senior executive such as meeting, consideration on remuneration etc.

2) The Company shall collect, use or disclose your personal data under the consent basis for the objectives to collect health data and religious data, including sensitive personal data appeared on the ID card or passport for identity authentication or for business operation of the Company.

3) The Company shall collect, use or disclose your personal data under legal obligation basis as follows:

- a) For compliance with legal rights and duties as the Company's director or executive
- b) For the necessity to report to the agencies as prescribed by law such as the Securities and Exchange Commission Office and the Stock Exchange of Thailand etc.
- c) For the necessity to constitute legal claim, to audit and to review facts in order to prevent corrupt behavior in exercising the right or to perform respective duties as stipulated by law
- d) For the necessity to constitute legal claim, legal compliance or legal claim or as a defense of a legal claim
- e) Upon receiving an order, a Court's summons or government notice to carry out any acts according to legal authority of such agency such as to compliment the submission of your inventory (if any) etc.

4) The Company shall collect, use or disclose your personal data under legitimate interest basis to achieve the following objectives:

- a) For the objectives of audit and identity authentication to perform respective duties according to the position or assigned authority
- b) For business understanding and administration of the Company, including the study visits as deemed necessary

- c) For risk management, monitoring and audit
- d) For prevention and review of various acts which are considered embezzlement, money laundering, criminal acts or any other illegal acts
- e) For an audits performed by major shareholders or other related agencies, investigation, examination or for the constitution or exercising of legal claim or to use as an evidence in any legal proceedings
- f) For the safety of building areas or facilities, including an exchange of access card before entering the Company's premises and CCTV recording

1.4 Disclosure of Personal Data

The Company may disclose your personal data to associated companies in the Company Group or other external parties to achieve the following objectives as set forth in this policy.

The Company may be required to disclose your personal data to a government agency or any other agencies as stipulated by law such as the Revenue Department, Social Security Office, Health Provincial Office, Securities and Exchange Commission Office, Stock Exchange of Thailand etc. Additionally, the Company may disclose personal data according to the order of the government agency or any other regulatory bodies as well as to submit your personal data to the National Credit Bureau for audit and may employ an audit result to prevent fraudulent or corrupt behavior.

The Company may be required to disclose your personal data to relevant external parties to proceed with an audit, inspection, assessment, request for legal advice, legal proceeding or any other proceedings necessary for the Company's business operation

1.5 Retention of Personal Data, Retention Period and Safety Measures

The Company shall maintain your personal data as long as it deemed necessary according to the objectives specified in this personal data protection policy. Additionally, the Company shall take into consideration the suitable retention period based primarily on the duration of employment contract, term of office and statute of limitations. Nonetheless, the Company may continue to maintain your personal data for the period specified in order to comply with relevant law or to constitute or exercise legal claim or to conform to the statute of limitations.

The Company shall maintain personal data in a form of a document and/or in a computer system or electronic system as well as establish appropriate safety measures of personal data to prevent any losses, accesses, uses, changes, rectifications or disclosures of personal data improperly or without legitimate authority. Nonetheless, the Company has restricted the access and use of technology to

maintain safety of your personal data to prevent an unauthorized access of the computer system. In a case that your personal data has been disclosed to any external parties processing data or the data processor, the Company shall supervise such person to ensure that he/she acts in accordance with the Company's order.

The Company shall delete or destroy personal data upon termination of the retention period of such personal data.

Chapter 2

Personal Data of Customers in the Petrochemical Business Unit

2.1 Your Personal Data Collected by the Company

Your personal data the Company has collected, used or disclosed shall include but not limited to the following personal data:

1) Personal data such as name-last name, name title, nickname, gender, ID number, passport number, tax ID number, position, nationality, age, username account, including other sensitive personal data such as religion, race and health data whereby the Company has been granted with your consent according to relevant law or when deemed necessary as required by law.

2) Contact data such as address, telephone number, mobile phone number, e-mail

3) Financial data such as savings account number, transaction data, credit card number

4) Other personal data such as data of family member, data relating to the use of IT system and other websites of the Company, CCTV recording, voice recordings from meetings

However, the Company has no intention to collect and process personal data of a minor under 10 years of age. Nonetheless, if you are a minor under 10 years of age or a quasi-incompetent or an incompetent who intends to gain access to the website, make inquiry about any products or services and must provide your personal data to the Company, your legal guardian or curator can proceed with such matters on your behalf and he/she can give his/her consent to the Company to proceed as such. In a case that the Company has found out that your personal data has been collected without the consent of your legal guardian or curator, the Company is entitled to reject any proceedings as per your request and shall delete your personal data except in a case that the processing of your personal data can depend on other legal bases which allow for the exception of the informed consent.

2.2 Sources of Personal Data

The Company may collect your personal data as you directly provide your personal data to the Company such as providing your personal data to the Company via registration on the Company's IT system, exchange of name card, request for details of the Company's products or services via the Company's website or other electronic channels etc. In addition, the Company may acquire your personal data from other sources such as from sales representatives of other business groups of the Company, business partners or associated companies, customers or representatives referred by the Company etc.

2.3 Objectives of the Collection, Use or Disclosure of Personal Data Under Legal Basis

The Company shall collect, use or disclose your personal data to achieve various objectives under legal basis as follows:

1) Contract basis: To contact or provide details of products or services upon your request and to contact you as you are interested in the Company's products or services, to offer products as per your request, to consider on entering into the sales contract, including the collection of fees or payment

2) Legal obligation basis: For the necessity to constitute a legal claim, to use as an evidence in the defense of a legal claim, compliance with the court's order or order of the government agency with legal authority, including disclosure or report of your personal data to the government agency with legal authority

3) Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives:

- a) For audit and identity authentication purposes relating to any transactions or legal act and contract
- b) For an audits by major shareholders or relevant agencies, investigation, examination, audit, request for advice to constitute legal claim or legal proof procedures in which your personal data may be disclosed to the lawyer, legal and tax consultant, auditor, including other consultants to achieve such objective
- c) For risk management, monitoring and internal control and organization management, assessment of relevant criteria, including disclosure of personal data to major shareholders for internal audit and prevention of any misconducts or illegal acts
- d) For the analysis of your personal data for the improvement of the Company's products or services, including business assessment, improvement, planning and forecast
- e) For the security of the building areas or facilities from CCTV recording

4) Consent basis: The Company shall perform activities to achieve the following objectives upon receiving your consent:

- a) To analyze purchasing or usage behavior of the Company's products or services and to offer benefits or promotional campaigns, promotions or any other discounts to attract the customer's attention on the Company's products and services
- b) To inform news and marketing activities, including new products and services which may be of your interest
- c) Upon receiving your legal consent to collect, use or disclose sensitive personal data such as health data, religious data and other sensitive personal data appeared on the ID card or passport in order to authenticate your identity as well as to facilitate and ensure your safety while participating in the Company's activities

2.4 Disclosure of Your Personal Data

The Company shall not disclose your personal data to any external parties unless otherwise informed or upon being granted your consent or when it is deemed necessary to disclose or to report your personal data to the regulatory bodies, government agencies or any other agencies as stipulated by law relating to the Company's business operation.

Besides, the Company may be required to disclose your personal data to relevant external parties for the objectives mentioned above in order to proceed with an audit, request for legal advice, inspection, assessment, legal proceedings or any other proceedings necessary for the Company's business operation.

Chapter 3

Personal Data of the Customers of Petroleum Business Unit

3.1 Your Personal Data Collected by the Company

Your personal data that the Company has collected, used or disclosed shall include but not limited to the following personal data:

1) Personal data such as name-last name, name title, gender, date of birth, ID number, passport number, tax ID number, position, nationality, age, username account, including other sensitive personal data such as religion, race and health data whereby the Company has been granted with your consent according to relevant law or when deemed necessary as required by law

2) Contact data such as address, telephone number, mobile phone number, e-mail

3) Financial data such as savings account number, transaction data, credit card number

4) Other personal data such as data relating to family member, data on the use of IT system and other websites of the Company, CCTV recording, voice recordings from meetings

However, the Company has no intention to collect and process personal data of a minor under 10 years of age. Nonetheless, if you are a minor under 10 years of age or a quasi-incompetent or an incompetent who intends to gain access to the website, make inquiry about any products or services and must provide your personal data to the Company, your legal guardian or curator can proceed on such matters on your behalf and he/she can give his/her consent to the Company to proceed as such. In a case that the Company has found out that your personal data has been collected without the consent of your legal guardian or curator, the Company is entitled to reject any proceedings as per your request and shall delete your personal data except in a case that the processing of your personal data can depend on other legal bases which allow for the exception of the informed consent.

3.2 Sources of Personal Data

The Company may collect your personal data as you directly provide your personal data to the Company such as providing your personal data to the Company via registration on the Company's IT system, exchange of name card, request for details of the Company's products or services via the Company's website or other electronic channels etc. additionally the Company may acquire your personal data from other sources such as from sales representatives of other business groups of the Company, business partners or associated companies, customers or representatives referred by the Company etc.

3.3 Objectives of the Collection, Use or Disclosure of Personal Data Under Legal Basis

The Company shall collect, use or disclose your personal data to achieve the following objectives under legal basis as follows:

1) Contract basis: To contact or provide details of products or services upon your request and to contact you as you are interested in the Company's products or services, to offer products as per your request, to consider on entering into the sales contract, including the collection of fees or payment

2) Legal obligation basis: For the necessity to constitute a legal claim, to use as an evidence in the defense of legal claim, compliance with the court's order or order of the government agency with legal authority, including disclosure or report of your personal data to the government agency with legal authority

3) Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives:

- a) For audit and identity authentication purposes relating to any transactions or legal act and contract
- b) For an audits by major shareholders or relevant agencies, investigation, examination, inspection, request for advice to constitute legal claim or legal proof procedures in which your personal data may be disclosed to the lawyer, legal and tax consultant, auditor, including other consultants to achieve such objective
- c) For risk management, audit, internal control and organization management as well as disclosure of personal data to major shareholders for internal audit and prevention of any misconducts or illegal acts
- d) For the analysis of your personal data for the improvement of the Company's products and services, including business assessment, improvement, planning and forecast
- e) For the safety of building areas or facilities from CCTV recording

4) Consent basis: The Company shall perform activities to achieve the following objectives upon receiving your consent:

- a) To analyze purchasing behavior or use of products or services of the Company as well as to propose benefits or promotional campaigns, promotions or any other discounts to attract customers' attention on the Company's products and services.
- b) To inform news and marketing activities, including new products and services which may be of your interest
- c) Upon receiving your legal consent to collect, use or disclose sensitive personal data such as health data, religious data and other sensitive personal data appeared on the ID card, passport in order to authenticate your identity as well as to facilitate and ensure your safety while participating in the Company's activities

3.4 Disclosure of Your Personal Data

The Company shall not disclose your personal data to any external parties unless otherwise informed or upon being granted with your consent or when it deems necessary to disclose or to report your personal data to the regulatory bodies, government agencies or any other agencies as stipulated by law relating to the Company's business operation.

The Company also may be required to disclose your personal data to relevant external parties according to the objectives mentioned above and to proceed with an audit, request for legal advice, inspection, assessment, legal proceeding and any other proceedings necessary for the Company's business operation.

Chapter 4

Personal Data of Customers of Port and Asset Management Business Unit

4.1 Your Personal Data Collected by the Company

Your personal data the Company has collected, used or disclosed shall include but not limited to your personal data of the following types:

1) Personal data such as name-last name, name title, gender, date of birth, ID card number, passport number, tax ID number, position, nationality, age, asset location, including other sensitive personal data such as religion, race and health data whereby the Company has been granted with your consent according to relevant law or when deemed necessary as required by law.

2) Contact data such as address, telephone number, mobile phone number, e-mail

3) Financial data such as savings account number, transaction data, rental fees or collaterals

4) Other personal data such as data on the use of IT system and other websites of the Company, CCTV recording, voice recordings from meetings

However, the Company has no intention to collect and process data of a minor under 10 years of age. Nonetheless, if you are a minor under 10 years of age or a quasi-incompetent or an incompetent who intends to gain access to the website, make inquiry about any products or services and must provide your personal data to the Company, your legal guardian or curator can proceed on such matters on your behalf and he/she can give his/her consent to the Company to proceed as such. In a case that the Company has found out that your personal data has been collected without the consent of your legal guardian or curator, the Company is entitled to reject any proceedings as per your request and shall delete your personal data except in a case that the processing of your personal data can depend on other legal bases which allow for the exception of the informed consent.

4.2 Sources of Personal Data

The Company may collect your personal data as you directly provide your personal data to the Company such as providing your personal data to the Company via registration on the Company's IT system, exchange of name card, request for details of the Company's products or services via the Company's website or other electronic channels etc. Additionally, the Company may acquire your personal data from other sources such as from sales representatives of other business groups of the Company, business partners or associated companies, customers or representatives referred by the Company, including but not limited to, the Board of Investment (BOI), Industrial Estate Authority of

Thailand or other agencies or representatives providing information on asset investment to the investors etc.

4.3 Objectives of the Collection, Use or Disclosure of Personal Data Under Legal Basis

The Company shall collect, use or disclose your personal data to achieve the following objectives:

1) Contract basis: To contact or provide details of products or services upon your request and to contact you as you are interested in the Company's products or services, to offer products as per your request, to consider on entering into the lease agreement, including the collection of fees or payment

2) Legal obligation basis: For the necessity to constitute a legal claim to use as an evidence in the defense of legal claim, compliance with the court's order or order of the government agency with legal authority, including disclosure or report of your personal data to the government agency with legal authority

3) Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives:

- a) For audit and identity authentication purposes relating to any transactions or legal act and contract
- b) For an audit by major shareholders or relevant agencies, investigation, examination, inspection, request for advice to constitute legal claim or legal proof procedures in which your personal data may be disclosed to the lawyer, legal and tax consultant, auditor, including other consultants to achieve such objective
- c) For risk management, audit, internal control and organization management as well as disclosure of personal data to major shareholders for internal audit and prevention of any misconducts or illegal acts
- d) For business analysis or evaluation, improvement, planning and forecast
- e) For the safety of the building areas or facilities from CCTV recording

4) Consent basis: The Company shall perform activities to achieve the following objectives upon receiving your consent

- a) To inform news and business information and to invite for participation in the customer relations activities via the channel you have already given your permission
- b) To make a satisfactory survey by answering questionnaires from the contractor or vendor of the Company
- c) Upon receiving your legal consent to collect, use or disclose sensitive personal data such as health data, religious data, including other sensitive personal data appeared on the ID card for identity authentication and for your facilitation and safety during your participation in the Company's activities

4.4 Disclosure of Your Personal Data

The Company shall not disclose your personal data to any external parties unless otherwise informed or upon being granted with your consent or when it deems necessary to disclose or report your personal data to the regulatory bodies, government agencies or any other agencies as stipulated by law relating to the Company's operation.

The Company may be required to disclose your personal data to relevant external parties according to the objectives mentioned above and to proceed with an audit, request for legal advice, inspection, assessment, legal proceeding and any other proceedings necessary for the Company's business operation.

Chapter 5

Personal Data of Business Partners and Counterparty

5.1 Your Personal Data Collected by the Company

Your personal data that the Company has collected, used or disclosed, including but not limited to the following types of personal data:

1) Personal data such as name-last name, name title, gender, date of birth, ID card number, passport number, tax ID number, position, nationality, age, work experience or employment record, skill, expertise, including sensitive personal data such as religion, race and health data whereby the Company has been granted with your legal consent or when deemed necessary as required by law.

2) Contact data such as address, telephone number, mobile phone number, e-mail

3) Financial and business data such as savings account number, transaction data, price and product details

4) Other personal data such as data relating to the use of IT system and websites of the Company, CCTV recording, voice recordings from meetings

5.2 Sources of Personal Data

The Company may collect your personal data as you directly provide your personal data to the Company such as exchange of name card, providing data for consideration on qualification, entering into contract etc. Moreover, the Company may receive your personal data from other sources such as sales representatives of other business groups of the Company, business partners or companies under the Company Group, customers or representatives referred by the Company

5.3 Objectives of the Collection, Use or Disclosure of Personal Data Under Legal Basis

The Company shall collect, use or disclose your personal data for various objectives under legal basis as follows:

1) Contract basis: For the consideration on qualification before entering into contract, contact and coordination relating to compliance with the contract, entering into contract, including payment as agreed upon the contract and payment via platform of the Company's vendor

2) Legal obligation basis: For the necessity to constitute legal claim, to use as an evidence as a defense of legal claim, compliance with the court's order or order of the government agency with legal

authority, including disclosure or report of your personal data to the government agency with legal authority

3) Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives:

- a) For audit and identity authentication purposes relating to any transactions or legal act and contract
- b) For an audit by major shareholders or relevant agencies, investigation, examination, audit, request for advice to constitute legal claim or legal proof procedures in which your personal data may be disclosed to the lawyer, legal and tax consultant, auditor, including other consultants to achieve such objective
- c) For risk management, audit and internal control and organization management as well as disclosure of personal data to major shareholders for internal audit and prevention of any misconducts or illegal acts
- d) For business analysis or evaluation, improvement, planning and forecast
- e) For the safety of the building areas or facilities from CCTV recording

4) Consent basis: The Company shall perform activities to achieve the following objectives upon receiving your consent

- a) To publicize and invite you as a business partner or counterparty of the Company to be interested in using the vendor's platform as a payment channel, including other related services provided by the Company's vendor
- b) Upon receiving your legal consent to collect, use or disclose sensitive personal data such as health data, religious data, including other sensitive personal data appeared on the ID card for identity authentication

5.4 Disclosure of Your Personal Data

The Company shall not disclose your personal data to any external parties unless otherwise informed or upon being granted with your consent or when it deems necessary to disclose or to report your personal data to the regulatory bodies, government agencies or any other agencies as stipulated by law relating to the Company's operation.

The Company may be required to disclose your personal data to relevant external parties for the objectives mentioned above to proceed with an audit, request for legal advice, inspection, assessment, legal proceeding or any other proceedings necessary for the Company's business operation.

Chapter 6

Personal Data of the Investors and Shareholders of the Company

6.1 Your Personal Data Collected by the Company

Your personal data the Company has collected, used or disclosed shall include but not limited to the following types of personal data:

1) Personal data such as name-last name, title, gender, date of birth, ID card number, age, including sensitive personal data such as face recognition (if any), fingerprint, religion, nationality and health data whereby the Company must be granted with your legal consent or as deemed necessary to proceed in accordance with relevant law

2) Contact data such as address, telephone number or e-mail

3) Financial data such as savings account number, dividend payment

4) Other personal data such as data on the use of IT system and websites of the Company, CCTV recording, voice recordings from meetings

6.2 Sources of Personal Data

The Company may collect your personal data as you directly provide your personal data to the Company such as providing your personal data as a shareholder, registration of shareholders' meeting, request for data in the Company's website or other applications as an investor etc. In addition, the Company may acquire your personal data from other related agencies such as registrar, company, Thailand Securities Depository Company Limited.

6.3 Objectives of the Collection, Use or Disclosure of Personal Data Under Legal Basis

The Company shall collect, use or disclose your personal data to achieve the following objectives under legal basis as follows:

1) Contract basis: To contact you as a shareholder, verification of the registration concerning the attendance of the shareholders' meeting and dividend payment

2) Legal obligation basis: To treat you in accordance with your legal right and duty as a shareholder as well as to disclose and report your personal data to the agency specified by law such as the Securities and Exchange Commission Office, the Stock Exchange of Thailand, the Securities Depository etc, including compliance with the court's order or order of the government agency with legal authority

The Company may be required to collect your personal data in order to constitute legal claim, audit and review facts to prevent corrupt behavior in exercising right or complying with relevant law as well as to use as an evidence in the defense of legal claim.

3) Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives:

- a) For the objective of audit and identity authentication relating to the performance of duty or according to delegated authority
- b) For an audit by major shareholders or other related agencies, investigation or examination, request for advice relating to the constitution of legal claim or legal proof
- c) For safety within the building areas or facilities from CCTV recording

4) Consent basis: To collect, use or disclose sensitive personal data such as health data, religious data, including other sensitive personal data appeared on the ID card for identity authentication as well as to facilitate and ensure your safety during your participation with the Company's activities and to disclose your personal data concerning your insurance to other external parties

6.4 Disclosure of Your Personal Data

The Company shall not disclose your personal data to any external parties unless otherwise informed or upon being granted with your consent or when it deems necessary to disclose or to report your personal data to the insurance company which is the Company's counterparty to achieve the following objectives mentioned above.

The Company may be required to disclose or report your personal data as stipulated by law to other related agencies such as the Securities and Exchange Commission Office, the Stock Exchange of Thailand, Thailand Securities Depository Company Limited, registrar and the Department of Business Development etc.

The Company may be required to disclose your personal data to relevant external parties for the objectives mentioned above in order to proceed with an audit, request for legal advice, inspection, assessment, legal proceeding or any other proceedings necessary for the Company's business operation.

Chapter 7

Personal Data of Other Persons Relating to the Company

Apart from personal data of the customers, business partners and counterparties as mentioned in this policy, the Company may collect and process your personal data as you are a visitor or a person entering into the premises under the Company's responsibility. Moreover, you might be a person whom the Company has collected personal data since you have participated in some social activities or any other activities; for example, you might be the customer of other types not mentioned in this policy.

7.1 Your Personal Data Collected by the Company

In a case where you are a visitor or a person entering into the premises under the Company's responsibility, the Company shall collect, use or disclose your personal data which include but not limited to the following:

- 1) Personal data such as name-last name, name title, gender, ID card number, age, education background, photo
- 2) Contact data such as address, telephone number, mobile phone number, e-mail
- 3) Other personal data such as driver's license number, license number from the Department of Energy Business, license plate number, details of the vehicle's size, details of the car owner, details of the contractor and data from CCTV recording

However, the Company has no intention to collect and process your sensitive personal data. In a case that the copy of your ID card or any cards issued by the government for identity authentication is required, the Company must delete all sensitive personal data appeared on such card unless otherwise permitted or informed or in a case where the Company can refer to any legal bases and use such legal basis which allows for the exception of the informed consent.

In a case that you are a person participating in any social activities or projects or other activities organized by the Company or activities in which the Company has been involved, including the foundation, association or non-profit organization or a person living in the community supported and assisted by the Company or any other customers not mentioned in the policy, the Company may collect, use or disclose your personal data that include but not limited to the following:

- 1) Personal data such as name-last name, name title, gender, date of birth, ID number, age, profession, position, education background, work experience, name of agency or office and academic institution

2) Sensitive personal data such as face recognition (if any), fingerprint, religion, nationality, health data, details of disease and treatment record, medical treatment and disability details in which the Company has been granted with your consent as stipulated by law or as deemed necessary and permitted by law.

3) Contact data such as address, telephone number, mobile phone number, e-mail

4) Financial data such as savings account number, income, subsidy, details of the scholarship and employment remuneration

5) Other personal data such as your portfolio, details of the disabled's guardian, data on the use of IT system and other websites of the Company, CCTV recording, still photo and VDO recording of the activities being organized, voice recordings from various meetings

Nonetheless, in a case that you are a minor under 10 years of age or a quasi-incompetent or an incompetent, the Company shall ask your legal guardian or curator to carry out any tasks on your behalf as well as to give consent to the Company for further action as deemed appropriate.

In a case where the Company has found out that your personal data has been collected without the consent of your legal guardian or curator, the Company is entitled to reject any proceedings as per your request and shall delete your personal data except in a case that the processing of your personal data can depend on other legal bases which allow for the exception of the informed consent.

7.2 Sources of Personal Data

The Company may collect your personal data as you directly provide your personal data to the Company such as registration, application, training attendance, contact to enter the Company's premises, exchange of access card, participation in the Company's activities, contact for service or support from the Company. Besides, the Company may receive your personal data via the foundation, association or non-profit organization, academic institution or government agency in need of support or other reference persons etc.

7.3 Objectives of the Collection, Use or Disclosure of Your Personal Data Under Legal Basis

The Company shall collect, use or disclose your personal data to achieve various objectives under legal basis as follows:

1) Contract basis: For the necessity to comply with the contract or to proceed with your request before entering into contract to perform the following activities:

- a) To contact for sales of products or services, to receive or provide services
- b) To organize training regarding the access card during entrance of the Company's premises, parking permit as well as to supervise and monitor working schedule of the contractor
- c) To consider the qualification in providing support and assistance upon request, including request for academic funding

2) Legal obligation basis: For the necessity to comply with relevant law or to achieve the objectives as stipulated by law to perform the following activities:

- a) For the necessity to constitute legal claim to achieve the objectives of an audit and identity authentication in order to prevent corrupt behavior in exercising the right or complying with relevant law and to use as an evidence in the defense of legal claim
- b) For the objectives relating to preventive medicine or occupational medicine, efficiency assessment or to achieve the objective concerning the diagnosis, health or social services, medical treatment, health management and social work
- c) For medical welfare of a legitimate person or social protection
- d) For disclosure and report of your personal data to the agency specified by law

3) Legitimate interest basis: By taking into consideration the proportionality and your expectation whereby the benefits derived must be well balanced with your basic rights concerning personal data protection in order to achieve the following objectives:

- a) For the safety of building areas or facilities from CCTV recording and exchange of access card before entering the Company's premises as well as to prevent any dangers or emergency incidents within the premises
- b) For an audit by major shareholders or related agencies, investigation, examination, request for advice on the constitution of legal claim or legal proof or to use as an evidence in the legal proceeding
- c) For the objectives of audit and identity authentication or confirmation of qualification
- d) For the demonstration of photos from activities and atmospheres of such activities organized or supported by the Company

e) For the analysis of the perception of people in the community through behavioral observation in order to improve and develop relationship

4) Consent basis: For the collection, use or disclosure of sensitive personal data such as health data, religious data, disability, including other sensitive personal data appeared on the ID card for identity authentication and to facilitate operation or to arrange for proper working environment

7.4 Disclosure of Your Personal Data

The Company shall not disclose your personal data to any external parties unless otherwise informed or upon being granted with your consent or when it deems necessary to disclose or to report your personal data as to the regulatory bodies, government agencies or any other agencies as prescribed by law regarding the Company's business operation.

In addition, the Company may be required to disclose your personal data to relevant external parties according to the objectives mentioned above and to organize activities or projects, to provide community services, audit, request for legal advice and inspection, assessment, litigation and other proceedings as deemed necessary.

Chapter 8

Data Retention, Retention Period and Safety Measures

The Company shall maintain your personal data as long as the Company deems necessary to achieve the objectives stated in this policy. The Company shall consider suitable duration in retaining your personal data from the contract period, statute of limitations, including the necessity to further data retention according to the period required for legal compliance, constitution or exercising of legal claim.

The Company shall maintain and keep your personal data securely and in a suitable manner, whether they be in a form of document, computer system and electronic system, including other devices the Company has employed to ensure safety of your personal data.

The Company would like to ensure you of our safety and security measures on personal data protection which shall be appropriate and in line with international standards in order to prevent any losses, accesses, uses, changes, rectifications or disclosures of personal data improperly or act without legitimate authority.

Nonetheless, the Company has restricted the access and use of technology on the safety of your personal data to prevent any unauthorized accesses to computer or electronic system. In a case that your personal data might be disclosed to the external party who processes data or to the data processor, the Company shall supervise such person to proceed appropriately to ensure its compliance with related laws.