



บริษัท ไทยทาคาซากิ จำกัด THAI TAKASAGO CO., LTD.

Personal Data Protection Policy of Thai Takasago Co., Ltd.

This Personal Data Protection Policy of Thai Takasago Co., Ltd., including the Thai Takasago Group (hereinafter collectively referred to as the “Company”), has been established to ensure that the Company’s operations comply with the Personal Data Protection Act B.E. 2562 (2019), as well as other relevant laws and any future amendments. It also aims to assure data subjects that the Company operates transparently, fairly, and responsibly in the collection, use, or disclosure of personal data, and that data subjects are informed of how the Company handles personal data, including their legal rights regarding such data. Therefore, the Company hereby announces this Personal Data Protection Policy concerning the collection, use, or disclosure of personal data of individuals who have a relationship with the Company as follows:

1. Scope of Application of the Personal Data Protection Policy

This Policy applies to the personal data of individuals who have a relationship with the Company, whether legally or practically, and whose personal data is processed by the Company. This includes, but is not limited to, the following persons:

- 1) Employees (persons employed by the Company under labor laws)
- 2) Job applicants
- 3) Business partners, contractors, and service providers who are natural persons
- 4) Directors, authorized persons, representatives, agents, shareholders, employees, or other persons in similar roles of legal entities that have a relationship with the Company
- 5) Natural persons who are customers or users of the Company’s products or services
- 6) Visitors or users of the Company’s website, including systems, applications, programs, devices, or other communication channels controlled by the Company
- 7) Individuals working on construction projects
- 8) Individuals present in or entering the Company’s offices, workplaces, or any other premises under the Company’s control
- 9) Other individuals whose personal data is collected by the Company, such as employees’ or job applicants’ family members, emergency contacts, insurance beneficiaries, etc.

Personal data collected prior to the enforcement of the Personal Data Protection Act B.E. 2562 (2019) will continue to be retained and used for its original purposes. For any other actions beyond collection and use of such personal data, the Company will comply with the Personal Data Protection Act B.E. 2562 (2019).

In addition to this Policy, the Company may establish a Privacy Notice for specific cases or for certain groups of individuals to inform the relevant data subjects about the personal data being processed, the purposes and lawful basis for such processing, the retention period of personal data, as well as the rights of data subjects in relation to their personal data in each specific case.

In the event of any material conflict between the contents of the Privacy Notice and this Policy, the provisions of the Privacy Notice for that particular case shall prevail.

2. Preamble and meaning

Preamble	Meaning
“Thai Takasago Group” or “Company”	Refers to the Personal Data Controller who has the authority to make decisions regarding the collection, use, or disclosure of personal data under this Policy, consisting of the following legal entities: (1) Thai Takasago Co., Ltd. (2) Thai Takasago Holdings Co., Ltd.
“Data Subject”	Refers to a individual person who owns the personal data collected, used, or disclosed by the Company under this Policy.
“Personal Data”	Refers to means any information relating to a Person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased Persons in particular.
“Sensitive Data”	Refers to personal data as prescribed under Section 26 of the Personal Data Protection Act B.E. 2562 (2019), which includes data concerning race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health information, disability, labor union membership, genetic data, biometric data, or any other data that may similarly affect the data subject as determined by the Personal Data Protection Committee under the authority of the Personal Data Protection Act B.E. 2562 (2019).
“Personal Data Protection Law”	Refers to the Personal Data Protection Act B.E. 2562 (2019) and all related subordinate legislation.

3. Purposes of Collecting, Using, or Disclosing Personal Data

The Company collects, uses, or discloses personal data of data subjects for various purposes, depending on the necessity of each case and the nature of the relationship between the data subject and the Company, as well as contextual considerations. The purposes outlined below represent general objectives:

- 1) To carry out or manage the Company’s operations under contracts or legal transactions related to the data subject.
- 2) To conduct the Company’s financial transactions.
- 3) To maintain and update information related to the data subject, including documents associated with personal data.

- 4) To analyze data, assess and manage risks, and resolve issues related to the Company's business operations.
- 5) To perform necessary actions for internal organizational management, including employment operations, human resource management, employee benefits, and welfare.
- 6) To prevent, detect, avoid, and investigate fraud, security breaches, prohibited or unlawful acts that may cause harm to both the Company and the data subject.
- 7) To verify identity, authenticate, and validate information when the data subject has a relationship with the Company or exercises legal rights.
- 8) To communicate and provide information to the data subject, including business communications for offering products and services.
- 9) To prepare and deliver relevant and necessary documents or information.
- 10) To comply with applicable laws, regulations, and enforceable orders, or to proceed with legal actions, court orders, and exercise rights related to the data subject's information.
- 11) To maintain public order, ensure security, prevent or avert danger to life, body, health, or property of individuals.”

4. Sources of Personal Data Collected by the Company

The Company collects or obtains various types of personal data from the following sources:

- 1) Directly from the data subject.
- 2) From affiliated companies or entities within the same business group for joint business operations, including but not limited to **Takasago Thermal Engineering Co., Ltd.**, a legal entity under the laws of Japan.
- 3) From the data subject's use of websites under the Company's control or various applications, as well as other services provided by the Company.
- 4) From sources other than the data subject, where such sources have legal authority, lawful reasons, or have obtained consent from the data subject to disclose the information to the Company.
- 5) From communications, quotations, recruitment, contract execution, and other sources such as government agencies, business partners, or third parties.

5. Types and Categories of Personal Data Collected by the Company

The Company may collect or obtain personal data depending on the necessity of each case, the nature of the relationship between the data subject and the Company, and other relevant considerations affecting the collection of personal data. The types and categories of data listed below represent a general framework for the Company's data collection.

In the event that the data subject refuses to provide necessary information in each case and as required by the nature of the relationship with the Company, such refusal

may result in the Company being unable to comply with legal obligations or contractual requirements, or to enter into a contract with the data subject in whole or in part.

Types of Personal Data	Details and Examples
Information of person in particular	<p>Information that specifies the name of the data subject or information from official documents identifying the data subject, such as:</p> <ul style="list-style-type: none"> - Title, First name last name, Middle name, Nickname. - Signature - ID number - Nationality - Driver's license number - Passport number - House registration details - Professional license information - Social security details
Personal Characteristics Information	<p>Details about the data subject, such as:</p> <ul style="list-style-type: none"> - Date of birth - Gender - Height, Weight, Age - Marital status - Military service status - Photograph, Video image - Language - Behavioral data, Preferences - Bankruptcy status - Incapacity or quasi-incapacity status
Contact Information	<p>Information for contacting the data subject, such as:</p> <ul style="list-style-type: none"> - Home phone number - Mobile phone number - Fax number - Email address - Residential address - Social media usernames (Line ID, MS Teams, etc.) - Location map of residence - Emergency contact details and reference persons
Employment and Education Information	<p>Employment details, including work and education history, such as:</p> <ul style="list-style-type: none"> - Degree certificates - Employment type - Occupation, Rank, Position, Duties - Expertise - Work permit status - Reference persons

	<ul style="list-style-type: none"> - Taxpayer identification number - Employment history - Compensation and salary details - Performance evaluations - Benefits and entitlements - Achievements, Training records - Military service details
Asset Information	Details about the data subject's assets, such as: <ul style="list-style-type: none"> - Vehicle registration documents - Other property registration documents in the data subject's possession.
Financial and Insurance Information	Such as: <ul style="list-style-type: none"> - Bank account details and numbers - Income details - Tax information - Provident fund details - Insurance policy details.
Usage of Assets or Services Information	Such as: <ul style="list-style-type: none"> - Phone usage history - Email usage history - User account names and passwords - Computer traffic data - Geolocation data - Photos, Videos, Audio recordings - Behavioral usage data - Browsing history - Cookies or similar technologies - Device numbers, Device information - IP address - Access and connection details - Browser information - Language settings - Operating system details
Sensitive Personal Data	Personal data of a sensitive nature, such as: <ul style="list-style-type: none"> - Race - Religion - Health information - Disability information - Criminal record - Labor union membership - Biometric data (e.g., facial recognition data, fingerprints)
Technical Information	Usage and profile data, such as: <ul style="list-style-type: none"> - IP address - Login information

	<ul style="list-style-type: none"> - Username and password - Preferences - Survey data - Website browsing data - Cookies and other technologies used for website access.
Legal Transaction Information	<p>Information related to transactions with customers, such as:</p> <ul style="list-style-type: none"> - Copy of corporate registration certificate - Copy of memorandum of association.

6. Legal Basis for Collecting Personal Data

The company uses one or more legal bases for collecting personal data as appropriate and depending on the context of each case, which include:

- 1) To comply with legal obligations
- 2) Necessary for legitimate interests
- 3) Necessary to prevent or suppress danger to life, body, or health of an individual
- 4) To perform a contract or to enter into a contract
- 5) Consent of the data subject

7. Disclosure of Personal Data

The company may disclose collected personal data for purposes as notified or with the consent of the data subject, or for lawful reasons, only as necessary and limited. Personal data may be used and disclosed to the following persons or entities, depending on necessity in each case or the nature of the relationship between the data subject and the company. However, the company will not disclose any personal data without consent and will disclose only for the purposes previously notified:

- 1) Government agencies, such as competent courts, Royal Thai Police, Ministry of Labor, Department of Provincial Administration, Revenue Department, etc., as well as other private entities that issue documents containing personal data
- 2) Contracting parties, business partners, or service providers of the company who need to perform any actions related to the data subject, such as banks, financial institutions, hospitals, insurance companies, software providers, electronic media providers, contractors or subcontractors, and the company's employers
- 3) Publications, websites, applications, or social media platforms under the company's management
- 4) Affiliates or companies within the same business group for business operations, including but not limited to Takasago Thermal Engineering Co., Ltd., a legal entity under the laws of Japan
- 5) Any other persons to whom the data subject has given consent to the company

8. Transfer or Transmission of Personal Data Abroad

In the normal course of the company's operations, which involve the use of data storage technologies and internet-based communications, it may be necessary to use and disclose personal data by transferring or transmitting such data to persons located in foreign countries or international organizations. This includes contracting parties,

business partners, or service providers of the company, as well as affiliates or companies within the same business group for joint business operations located abroad. Additionally, personal data may be used and disclosed through the use of information and communication technologies such as email, office programs, cloud storage, web storage, and applications, as most service providers host servers in foreign countries. Please note that the destination country or international organization receiving the personal data may have data protection standards that are insufficient or inconsistent with the Personal Data Protection Act B.E. 2562 (2019), depending on the applicable laws of each country.

9. Retention Period of Personal Data

- 1) The company will retain personal data for as long as necessary to fulfill the purposes specified in this policy or for no less than the period required by law, or for a reasonable period based on standard practices for each type of data, as applicable. For example: Accounting documents must be retained for at least 5 years from the end of the accounting period or until the handover of accounts. Employment-related documents must be retained for at least 2 years from the termination date of each employee. Legal documents must be retained for no less than the period required to enforce rights or the statute of limitations for legal claims.
- 2) The company will retain personal data for the period required by laws governing data retention, such as the Computer Crime Act B.E. 2550 (2007), the Revenue Code, or other applicable laws.
- 3) After the expiration of the retention period, the company will delete, destroy, or anonymize the personal data so that it can no longer identify the data subject.

10. Rights of Data Subjects

The company respects and strictly adheres to the rights of data subjects under the Personal Data Protection Act B.E. 2562 (2019), which include:

- 1) Right to withdraw consent (in cases where consent has been given)
- 2) Right to access and obtain a copy of personal data
- 3) Right to request to receive, send, or transfer personal data
- 4) Right to object to the collection, use, or disclosure of personal data
- 5) Right to erasure / Right to be forgotten (request deletion, destruction, or anonymization of personal data)
- 6) Right to restrict processing
- 7) Right to rectification (request correction of personal data)
- 8) Right to file a complaint with the supervisory authority in cases where the company violates or fails to comply with the Personal Data Protection Act B.E. 2562 (2019).

The company provides channels for data subjects only upon receiving a request from the data subject, authorized persons, heirs, legal representatives, guardians, or custodians, by submitting the request through the company's website or physical address. In cases where the data subject, successors, or heirs object to data collection, accuracy, or any actions such as requesting updates or corrections to personal data, the company will record such objections as evidence. However, the company

may refuse the right to object to data collection, accuracy, or any actions as permitted by law or in cases where the personal data of the data subject has been anonymized or rendered unidentifiable.

11. Measures for Ensuring Personal Data Security

The company has implemented appropriate and standardized security measures, not less than those required by law, to prevent loss, unauthorized access, use, alteration, modification, or disclosure of personal data. These measures will be reviewed as necessary or when technology changes to ensure consistent and effective security.

12. Reservation of Rights

The company reserves the right to deny requests under Section 11 in the following cases:

- 1) When permitted by law
- 2) When personal data has been anonymized or cannot identify the data subject
- 3) When the requester cannot provide evidence proving ownership of the personal data or authority to make the request
- 4) When the request lacks sufficient reason, such as inability to claim legal rights
- 5) When the request is excessive or repetitive without reasonable cause

13. Amendment of the Personal Data Protection Policy

The company will update this policy to comply with changes in laws and company operations. Updates may also be made based on feedback and suggestions from data subjects. The company will clearly announce such changes before implementation or may notify data subjects directly through its communication channels.

14. Company Information and Contact Details

Thai Takasago Co., Ltd.

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40/12 Moo 12, Bangna-Trad Road, Km. 6.5

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Tel: (+66) 2751-9695 to 9

Website: <https://www.thaitakasago.co.th>

This Personal Data Protection Policy of Thai Takasago Group has been posted at the headquarters of Thai Takasago Co., Ltd. (Bangna Tower C, 16th Floor, 40/12 Moo 12, Bangna-Trad Road, Km. 6.5, Bang Kaeo Subdistrict, Bang Phli District, Samut Prakan 10540) and/or on the website <https://www.thaitakasago.co.th>.