

Data Privacy Policy

TCC Assets (Thailand) Co., Ltd. and TCCA Group (collectively, the "**Company**") are committed to respecting individual rights and recognizing the importance of protecting data privacy, and thus, the Company has put in place this Data Privacy Policy to notify the owner of Personal Data about data privacy practices. With the aim of laying down the principles, the Company hereby announced the policies as follows:

1. Definition

"Personal Data" means any information relating to an individual, which enables the identification of such natural person, whether directly or indirectly, but not including the information of the deceased persons in particular;

"Sensitive Personal Data" means Personal Data classified by law as sensitive data. Sensitive data is distinct personal information that may lead to unfair discrimination and must be treated with extra protection, such as Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may affect the data subject in the same manner, as prescribed by the Personal Data Protection Committee.

"Data Subject" means an individual who is the owner of the Personal Data from which such Personal Data can be identified whether directly or indirectly.

"Processing" means any operations which is performed on Personal Data, such as collection, recording, organization, structuring, duplication, storage, adaptation or alteration, retrieval, use, disclosure, transmission, dissemination, transfer, combination, erasure, or destruction.

"Data Controller" means an individual or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data.

"Data Processor" means an individual or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such natural person or juristic person is not the Data Controller.

"Personal Data Protection Committee" means the Committee appointed which has the duty and authority to regulate and issue the rules, measures, or any practices relating to Personal Data protection in accordance with the Personal Data Protection Act, B.E. 2562 (2019).

2. Scope of Enforcement

This Data Privacy Policy applies to the Company, its employees, and individuals involved in the processing of Personal Data on the Company's instructions or on behalf of the Company.

3. Purpose of Personal Data Processing

The Company will collect, use, or disclose Personal Data by relying on the legal grounds for processing of Personal Data and for the Company's business operation. This includes transactions such as contract execution, financial transactions, procurement, communication and liaison, the Company's activities or efforts to improve work efficiency as well as for other purposes as permitted by laws, and/or for compliance with laws or regulations relating to the Company's operation. The Company will not engage any activities other than those specified in the purposes of the collection of Personal Data unless:

- (1) the data subject has been informed of such new purpose, and the consent is obtained from the data subject beforehand,
- (2) it is to comply with the Personal Data Protection Act B.E.2562 or other relevant laws.

4. Processing of Personal Data

4.1 Collection of Personal Data

The Company will collect Personal Data, directly and indirectly, using lawful methods which will be limited to the extent necessary to perform actions that are directly related to the purpose or benefit of such collection. Thus, in collecting the Personal Data, it is crucial to obtain the consent of the Data Subject beforehand. Nevertheless, the Company may collect, use and disclose Personal Data without the consent of the Data Subject under the following circumstances:

- (1) it is for the achievement of the purpose relating to the preparation of the historical documents or the archives for public interest, or for the purpose relating to research or statistics, in which the suitable measures to safeguard the Data Subject's rights and freedoms are put in place and in accordance with the notification as prescribed by the Personal Data Protection Committee;
- (2) it is for preventing or suppressing a danger to an individual's life, body or health;
- (3) it is necessary for the performance of a contract to which the Data Subject is a party, or in order to take steps at the request of the Data Subject prior to entering into a contract;
- (4) it is necessary for the performance of a task carried out in the public interest by the Data Controller, or it is necessary for the exercising of official authority vested in the Data Controller;
- (5) it is necessary for legitimate interests of the Data Controller or any other individuals or juristic persons other than the Data Controller, except where such interests are outweighed by the fundamental rights of the Data Subject regarding their Personal Data;
- (6) it is necessary for compliance with a law;

accordingly, the Company will inform the Data Subject of the Personal Data processing for their acknowledgment and consent through electronic means or other methods as specified by the Company. In case where the collection of sensitive data is required, the Company will seek explicit consent from the Data Subject prior to the collection, unless such collection is permitted under the provision of the Personal Data Protection Act B.E. 2562, or any other laws.

4.2 Use and/or disclosure of Personal Data

The Company will not disclose Personal Data without the consent of the Data Subject and will only disclose it in accordance with the purpose for which it has been notified to the Data Subject. Nevertheless, in case where it is necessary for the performance or benefit of the Data Subject, the Company may transfer and/or disclose Personal Data of the Data Subject to its affiliated companies or the other entities, both domestically and cross-border, such as companies within the same group, business partners and/or the designated Data Processor of the Company, or the outsourcing service providers who are required to perform service related to the Personal Data on behalf of the Company. When disclosing Personal Data to such entities, the Company will ensure that they maintain the confidentiality of the Personal Data and do not use it for purposes beyond the scope specified by the Company.

In addition, the Company may disclose Personal Data of the Data Subject in accordance with rules and regulations prescribed by law, including disclosure to the government agencies, state agencies, authorized regulators, or in response to the lawful requests related to legal prosecution or requests from private sectors or other relevant third parties involved in the legal process.

5. Period of Personal Data Retention

The Company will retain Personal Data for the duration it is deemed necessary for processing purposes and/or for so long as it necessary required by laws or relevant regulations for compliance purposes. The Company will erase and destroy Personal Data at the end of the retention period in compliance with applicable laws and the Company's internal guidelines for business operations.

6. Rights of the Data Subject

The Data Subject has the rights to exercise the following:

- 6.1 Right to access or request a copy of the Personal Data, including right to request disclosure of acquisition of the Personal Data obtained without consent.
- 6.2 Right to obtain, transmit, or transfer the Personal Data given to the Company to another data controller.
- 6.3 Right to object the processing of Personal Data.
- 6.4 Right to request the erasure, destruction, or de-identification of Personal Data.
- 6.5 Right to restrict the use of Personal Data.
- 6.6 Right to rectify Personal Data to ensure that it is accurate, up-to-date, complete, and not misleading.
- 6.7 Right to withdraw consent for the collection, use, and disclosure of Personal Data; provided, however, that the withdrawal of consent shall not affect the collection, use, or disclosure of Personal Data for which consent has already been given.
- 6.8 Right to lodge a complaint regarding the violation of applicable data protection laws.

The Data Subject is eligible to exercise the aforementioned rights by submitting a written request or sending an email to the Company's address mentioned in "Contact Us" section as described below. The Company will review the request and provide the Data Subject with a response within 30 (thirty) days from the date of receiving the request. The Company reserves the right to reject a request from the Data Subject if it is permitted by applicable laws.

7. Data Protection Measure

- 7.1 The Company implements appropriate measures to prevent unauthorized access, alteration, and destruction of Personal Data in accordance with the minimum standard for security and the safety of Personal Data protection. The Company will collect, use, and/or disclose Personal Data, whether in whole or in part, in accordance with its rights and obligations as permitted by Personal Data protection laws.
- 7.2 The Company supports and promotes employees' knowledge and awareness of their duties and responsibilities regarding the collection, use, and disclosure of Personal Data of the Data Subject. Employees are required to comply with the Company's Data Privacy Policy and internal guidelines on Personal Data protection to enable the Company to implement the policy lawfully and effectively and adhere to Personal Data protection laws.
- 7.3 When it becomes necessary for the Company to transmit or transfer Personal Data to foreign countries, including data servers operated by service providers located overseas, the Company will comply with applicable laws and ensure that the destination country maintains adequate standards for the protection of Personal Data. In case where the destination country does not have adequate standards for Personal Data protection, the Company will ensure secure transmission or transfer of Personal Data in compliance with the applicable law and implement necessary and appropriate Personal Data protection measures as required.

8. Revisions and Changes to Data Privacy Policy

The Company may review and amend this Policy, including guidelines and other documents relating to Personal Data protection from time to time to ensure conformity with legal provisions or technological changes. The Company is committed to continuously enhancing its Personal Data protection measures, ensuring they are always up-to-date and compliant with the law.

9. Contact Us

Should you have any queries or complaints regarding the collection, use, or disclosure of Personal Data or should you wish to exercise the Data Subject's rights pursuant to this Data Privacy Policy or the Personal Data Protection Act B.E. 2562, please contact the Company at:

TCC Assets (Thailand) Co., Ltd.

No. 57 Park Ventures Ecoplex, Unit 2105 - 2107, 21st Floor, Wireless Road,
Lumpini Sub-District, Pathumwan District, Bangkok 10330.

Telephone: +66 2 643 7380 Email: enquiry.pdpa@tccassets.com

This Policy will take effect from the 1st day of June 2022 onward.