

Personal Data Protection Policy (PDPA)

The Company has established the Personal Data Protection Policy to clarify the details and procedure for managing and processing personal data under the Company's possession and supervision to ensure maximum security which is compliance with the Personal Data Protection Act B.E. 2562 (2019), hereinafter referred to as the "Personal Data Protection Law". Therefore, the Company has announced the Personal Data Protection Policy as follows:

Clause 1 Definition

- **Personal Data** means the person-related data that is directly or indirectly identifiable but particularly excludes the deceased's data.
- **Data Subject** means you who is a natural person.
- **Data Controller** means Krungdhep Sophon Public Company Limited, KWC Logistics Company Limited, and Krungdhep Document Company Limited, hereinafter collectively referred to as the "Company".
- **Data Processor** means a person or a juristic person who operates the collection, use, or disclosure of your personal data according to the Company's order.
- **Data Protection Officer** means a person or a juristic person who performs the duty of auditing the Company's operation or the Data Processor, including the employees or the contractors of the said person about the collection, use, or disclosure of the personal data to ensure legality.

Clause 2 Source and Personal Data Collected by the Company

The Company shall collect personal data from you, or other sources of data as follows:

- 1.1 Personal data includes name, surname, title, age, sex, date of birth, age, photograph, blood group, nationality, religion, date of birth, data from personal background, education, position, career duty, shareholding data, Identification Card Number, and Passport Number, name card, shareholding proportion, signature, marital status, personal data of family member, criminal record, health checkup data, biometric data, photographs from phone camera, Closed Circuit Television, etc.
- 1.2 Contact data includes Telephone Number, address, country, identification account via Digital Identity Account, and profile pictures, including other data that is part of the profile related to the said Digital Account, etc.
- 1.3 Sensitive data includes your religious data appearing in identification card and/or ethnic-related data appearing in authentication documents, etc.
- 1.4 Financial data includes Bank Account Number, Taxpayer ID Number, etc.
- 1.5 Technical data includes E-mail, password, usage data of applications, Facebook, other technical data acquired from the use of online data, etc.
- 1.6 Other data other than stated in Clause 2.1-2.5.

Furthermore, the Company may request you to provide the personal data of your related persons, such as the personal data of the father, mother, husband, wife, or child. The Company shall supervise those personal data under this Policy.

Clause 3 Objective of Collection, Use, or Disclosure of Your Personal Data

- 1.1 For necessity to the following normal business operations of the Company
 - 1.1.1 To operate the business for developing and leasing immovable properties and investing in subsidiaries.
 - 1.1.2 To operate the warehouse and wharf business.
 - 1.1.3 To operate the document depository and management, document scanning, and electronic document management service businesses.
 - 1.1.4 Other operations, e.g. sale of products/services to the Company's customers, accounting, finance, auditing, personnel management, advertising and public relations, marketing, and any other operations relating to technology and information for completion of the aforesaid business operations
- 1.2 For executing the Labor Laws, e.g. Labor Protection Law, Social Security Law, Compensation Fund Law, Labor Relations Law, Provident Fund Law, etc.
- 1.3 For complying with other related laws, e.g. Civil and Commercial Law, Civil Procedure Law and/or Criminal Procedure Law, and Bankruptcy Law, etc.
- 1.4 For establishing the right of claim according to law

Clause 4 Personal Data Processing

After receipt of personal data from the source of personal data, the Company shall execute your personal data as specified in the detail in the handbook documents of each work unit and classified by the company.

- 1.1 Supervising and taking responsibility for job recruitment, employee employment, and compliance with the employee employment contract, work regulations, rules and/or orders of the employees, and expiration of the employee employment contract.
- 1.2 Controlling visitor access, controlling the record of image data via CCTV, controlling the sub-employment of the administrative works.
- 1.3 Supervising the payment and receiving money related to the Company's business.
- 1.4 Preparing the contractual documentation for the government agencies and the Company's business partners and opening Accounts for new customers.
- 1.5 Cancelling and adding the authorized person for performing the Company's transactions
- 1.6 Supervising, storing, scanning the customer documents, and delivering documents to customers.
- 1.7 Overseeing and providing services to the Company's customers in various areas and delivering invoices.

- 1.8 Overseeing purchase/procurement and storing the customer data records in the Company's system.
- 1.9 Supervising and preparing the usage system of the employees and customers and receiving opinions via website.
- 1.10 Managing the customer documents and receiving and delivering documents based on the customer orders.
- 1.11 Scanning documents and receiving and delivering document scan files to customers.

Clause 5 Disclosure of Your Personal Data to Other Persons

The Company may disclose your personal data to the following persons.

- 1.1 Group of the Companies consists of Krungdhep Sophon Public Company Limited, KWC Logistics Company Limited, and Krungdhep Document Company Limited.
- 1.2 The Company's service users include the customers of the Company's service users.
- 1.3 Practitioners include physicians, auditors, legal advisors, lawyers, etc.
- 1.4 Government agencies or other regulatory agencies as required by law include the Revenue Department, Social Security Fund, Court, Royal Thai Police, etc.
- 1.5 Related third parties include credit-facilitating banks, insurance/life insurance companies, debt collection companies, etc.

Clause 6 Cross-Border Data Transfer

The Company may need to transfer your personal data to foreign agencies or international organizations. The Company shall request your prior consent unless the Personal Data Protection Law permits the Company to do so.

However, in some cases, some receivers of your personal data may be in a destination country with personal data protection standards not equivalent to Thailand standards. When the personal data is transferred to foreign countries, the Company shall proceed according to the security procedures to be in line with the legal duties to ensure that the data is protected at the same level as we protect your personal data according to the currently applicable Personal Data Protection Law.

Clause 7 Personal Data Collection Period

The Company shall collect personal data according to the objective and necessity. Additionally, when that personal data must not be stored according to the objective or out of necessity, the Company shall manage to erase, destroy, or de-identify the said personal data as quickly as possible as determined in the Company's security standards. However, the Company shall further collect the said personal data not more than 10 years from the expiry date of the personal data collection.

Furthermore, the event of any necessity results in the Company's need to further collect, use, or disclose the personal data aforementioned. The Company reserves its right to extend the period as necessary and gives advance notice to you for acknowledgement.

Clause 8 Rights of Data Subject

Under the period of personal data collection, as determined in Clause 7, you are entitled to execute the following.

- 8.1 Right to withdrawal of the consent on collection, use, or disclosure of personal data in the case of the Company's request for your consent only;
- 8.2 Right to request for viewing personal data and request for the copy of personal data or disclose the acquisition of the said personal data without his/her consent;
- 8.3 Right to request for receiving the personal data, request for transmitting or transferring the personal data to other companies, or request for receiving the personal data transmitted or transferred by the Company.
- 8.4 Right to object to collection, use, or disclosure of personal data that has been collected by the Company without the request of your consent as required by law.
- 8.5 Right to request for the Company's erasure or destruction or de-identification of the personal data that make you unidentifiable, particularly in the case where the personal data is out of necessity, or you withdraw consent, or you exercise the right to object under Clause 8.4.
- 8.6 Right to request for suspension of the personal data usage in the case where the personal data is in the process of verification to be correct, updated, valid, and not to cause misunderstanding or to be out of necessity to store, or in the process of proof as required by law.
- 8.7 Right to request revising personal data to be correct, updated, valid and not to cause misunderstanding.

However, the details for exercising each type of your rights shall be in the Request Form prepared by the Company. You can contact to request for receiving to fill the Form at the Company.

You need not pay any expenses for execution under the above rights. The Company shall consider and notify the consideration results under your request within 30 days from the date on which the company has received the said request.

Clause 9 Personal Data Security Measures

The Company shall establish personal data security measures covering the preventive measures in management, technical, and physical aspects regarding the access or use of personal data. The Company has collected data according to ISMS 2700:2013 (Information Security Management System) System Standard.

Clause 10 Change in Personal Data Protection Policy

The Company shall regularly consider reviewing the Personal Data Protection Policy to be consistent with the said related practices, laws, and regulations. However, if the Personal Data Protection Policy is changed, the Company shall publish the latest issue of the Policy for your acknowledgement via the Company's website.

Clause 11 Contact Channels

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Clause 12 Data Protection Officer

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