



## Personal Data Protection Policy

Dated 9 October 2025

Thai Wah Public Company Limited and Thai Wah Group companies<sup>1</sup> (the "Company") respect privacy rights and place importance on the protection of personal data of all individuals who are related to or conduct transactions with the Company. Accordingly, the Company has established this Personal Data Protection Policy to set out clear and appropriate rules, measures, governance, and management of personal data in compliance with personal data protection laws.

### 1. Scope of Application

This Policy covers all Company personnel, including directors, executives, and employees at all levels, whether working domestically or overseas, factory personnel, interns, contract employees, and other relevant persons, all of whom are required to strictly comply with this Personal Data Protection Policy and other related practices.

### 2. Definitions

<b>Personal Data</b>	means	any information relating to a natural person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased persons.
<b>Sensitive Data</b>	means	personal information that is inherently private and sensitive and may be prone to unfair discrimination, such as race, ethnicity, political opinions, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any other data which similarly affects the data subject.
<b>Data Controller</b>	means	a natural person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data.
<b>Data Processor</b>	means	a natural person 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.
<b>Process/Processing</b>	means	any operation performed on Personal Data, such as collection, recording, organization, structuring, storage, adaptation, modification, retrieval, use, disclosure, transfer, dissemination, erasure, or destruction.

<sup>1</sup> "Thai Wah Group companies" means companies in which Thai Wah Public Company Limited holds, whether directly or indirectly, more than 50% of the total voting shares.

<b>Personal Data Protection Laws</b>	means	the Personal Data Protection Act B.E. 2562 (2019), Royal Decrees, and subordinate legislation issued thereunder, as may be amended from time to time.
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### **3. Personal Data Protection Governance**

- 3.1 The Company will establish governance over Personal Data, prescribe appropriate methods and security measures, and clearly define the mandates and responsibilities of relevant units and personnel, in order to create mechanisms for governance, control, operations, and auditing of personal data protection measures in compliance with Personal Data Protection Laws.
- 3.2 The Company will develop policies, procedures, and privacy notices related to the Company's personal data protection.
- 3.3 The Company will communicate and build awareness among its employees so that they have the knowledge and understanding of personal data protection and can effectively comply with the Company's Personal Data Protection Policy.

### **4. Collection of Personal Data**

The Company will collect, use, or disclose Personal Data on the relevant lawful bases under Personal Data Protection Laws, and will obtain consent from the data subject when such processing relies on consent as the legal basis. The Company will inform the data subject of the purposes and lawful bases before or at the time of collection as required by law. For Sensitive Data, the Company will obtain explicit consent prior to Processing, unless the Processing falls within a legal exception where consent is not required.

### **5. Purposes for Collecting or Using Personal Data**

- 5.1 The Company will Process the data subject's Personal Data for the benefit of the Company's operations, to improve the quality and efficiency of its operations, or to comply with applicable laws and regulations. The Company will Process such data only for as long as necessary for the purposes notified to the data subject or as required by law.
- 5.2 The Company will not take any action different from the stated purposes of Processing, unless:
  - (a) the Company has notified the data subject of the new purposes, or has obtained the data subject's consent; or
  - (b) it is for compliance with the Personal Data Protection Laws or other applicable laws.

### **6. Disclosure of Personal Data**

The Company will not disclose the data subject's Personal Data to any person without the data subject's consent, except in accordance with the lawful purposes that have been notified. However, the Company may disclose Personal Data as prescribed by law, such as disclosure to government authorities, state agencies, regulatory bodies, and in cases where disclosure is requested under statutory authority.

## 7. Security of Personal Data

The Company will implement appropriate security measures for Personal Data, consistent with applicable laws, policies, regulations, requirements, and data protection practices, to prevent the loss, access, use, alteration, modification, or disclosure of Personal Data without authorization or unlawfully.

## 8. Roles, Duties, and Responsibilities

<b>Board of Directors</b>	: The Board of Directors has the following duties and responsibilities: <ol style="list-style-type: none"><li>1. Oversee the implementation of effective personal data protection in compliance with Personal Data Protection Laws and establish internal controls to monitor and audit compliance with the law and the Company's Personal Data Protection Policy.</li><li>2. Assign and support the Leadership Team to ensure effective personal data protection in accordance with Personal Data Protection Laws.</li></ol>
<b>Leadership Team</b>	: Leadership Team has the following duties and responsibilities: <ol style="list-style-type: none"><li>1. Establish, improve, and review the Personal Data Protection Policy to ensure the Company's personal data protection activities comply with Personal Data Protection Laws.</li><li>2. Appoint a Data Protection Officer (DPO) when the Company meets the legal criteria requiring a DPO and appoint the Personal Data Protection Working Group.</li><li>3. Monitor and ensure that all relevant units in the organization comply with the Company's Personal Data Protection Policy and practices, and support and promote employees' knowledge, understanding, and awareness of their duties and responsibilities in Processing Personal Data in accordance with the Policy and Personal Data Protection Laws accurately and effectively.</li></ol>
<b>Data Protection Officer (DPO)</b>	: The Company's Data Protection Officer (DPO) has the following duties and responsibilities: <ol style="list-style-type: none"><li>1. Advise the Company, including management, employees, and the Company's contractors, on compliance with Personal Data Protection Laws.</li><li>2. Monitor the operations of the Company, including management, employees, and the Company's contractors, regarding the collection, use, or disclosure of Personal Data to ensure compliance with the Personal Data Protection Act B.E. 2562 (2019) and related laws.</li></ol>

	<ol style="list-style-type: none"> <li>3. Coordinate and cooperate with the Office of the Personal Data Protection Committee (PDPC) in cases involving issues related to the collection, use, or disclosure of Personal Data.</li> <li>4. Maintain the confidentiality of Personal Data known or obtained in the course of performing duties under Personal Data Protection Laws.</li> <li>5. Report to the Leadership Team when there are incidents or issues concerning the collection, use, or disclosure of Personal Data.</li> <li>6. The Head of the Legal Department shall serve as the Data Protection Officer (DPO)</li> </ol>
<b>Personal Data Protection Working Group</b>	<p><b>Personal Data Protection Working Group</b> :</p> <p>The Personal Data Protection Working Group, consisting of employee representatives from various departments of the Company who have been assigned as members of the Personal Data Protection Working Group, has the following duties and responsibilities:</p> <ol style="list-style-type: none"> <li>1. Prepare, compile, and maintain the Record of Processing Activities (ROPA) in accordance with Personal Data Protection Laws and the Legal Department's guidance, and regularly review and update the information to ensure accuracy and currency.</li> <li>2. Representing their departments in controlling, supervising, and monitoring the use of personal data to ensure it aligns with the purposes notified to data subjects and complies with Personal Data Protection Laws.</li> <li>3. Representing their departments in contacting the Legal Department on issues related to personal data protection.</li> <li>4. The Data Protection Officer shall serve as the Head of the Personal Data Protection Working Group.</li> </ol>
<b>Legal Department</b>	<p><b>Legal Department</b> :</p> <p>The Legal Department has the following duties and responsibilities:</p> <ol style="list-style-type: none"> <li>1. Establish and communicate personal data protection guidelines to ensure relevant parties are informed and comply accordingly.</li> <li>2. Promote employees' knowledge, understanding, and awareness of their duties and responsibilities in Processing Personal Data in accordance with Personal Data Protection Laws.</li> <li>3. Provide advice to the Company, including management, employees, and the Company's contractors, on compliance with Personal Data Protection Laws.</li> <li>4. Provide advice, consultation, and support to the Personal Data Protection Working Group in preparing the ROPA and complying with Personal Data Protection Laws.</li> </ol>

	<p>5. Receive and handle data subject rights requests by coordinating and managing related matters through to completion.</p> <p>6. Receive notifications of personal data breaches and take appropriate actions consistent with Personal Data Protection Laws.</p>
<b>Executives and Employees</b>	<p>Company Management and Employees have the following duties and responsibilities:</p> <ol style="list-style-type: none"> <li>1. Comply with laws, policies, practices, and privacy notices related to the Company's personal data protection.</li> <li>2. Immediately inform their supervisors and the Legal Department in the event of a personal data breach, any non-compliance with laws, policies, practices, or privacy notices, and upon receiving a data subject rights request.</li> </ol>

#### 9. Penalties

Non-compliance with the Company's Personal Data Protection Policy may constitute a disciplinary offense and be subject to disciplinary action and may also be subject to penalties as prescribed by law.

Prepared by: Legal & Corporate Affairs Department

Approved by: Leadership Team Meeting

Date: 9 October 2025



(Mr. Ho Ren Hua)

Chief Executive Officer

Thai Wah Public Company Limited

**Document Revision Record**

<b>Edition/ Revision No.</b>	<b>Date</b>	<b>Section(s) Revised/Added</b>
00	9 October 2025	Newly prepared (initial issue)