



Privacy Notice

Thai Wah Public Company Limited

This Privacy Notice sets out the principles for managing all personal data that Thai Wah Public Company Limited and its Group Companies¹ (the "Company") receive, whether directly or indirectly. The Company, its employees, business partners, vendors, or third parties acting for or on behalf of the Company are committed to protecting your privacy and assure you that your personal data will be processed in accordance with applicable data protection laws, including the Personal Data Protection Act B.E. 2562 (2019) ("PDPA").

1. Collection of Personal Data

1.1 Source of Personal Data

The Company collects personal data that you provide directly to us, as well as personal data that we receive or access from various sources and situations, including but not limited to the following:

Personal Data Obtained Directly from You	:	<ul style="list-style-type: none">• Applying, registering, or requesting to use the Company's products and services.• Contracts between you and the Company, whether before, during, or in the performance of the contract.• Contact or conversations between you and the Company, including recordings of phone calls, emails, text messages, or other methods.• Visiting the Company's website or using its applications.• Insurance policy claims or other documents.• Audits and any statements made to the Company.• Customer satisfaction surveys.• Participation in various Company activities.
Personal Data Obtained from Other Sources	:	<ul style="list-style-type: none">• The Company's agents or service providers.• The Company's affiliates.• Business partners.• Government agencies, authorized persons or entities, authorized government officials, or any other state agencies.• Third parties or other entities with whom the Company has a legal relationship.

¹ Group Companies means companies in which Thai Wah Public Company Limited holds, whether directly or indirectly, more than 50% of the total number of shares with voting rights.

Public Data from Public Sources	:	<ul style="list-style-type: none"> • Research from the internet or social media. In such cases, the Company will only collect personal data that you have chosen to make public.
--	---	---

1.2 Personal Data Collected by the Company

The personal data that the Company may collect from you under the relevant laws includes, but is not limited to, the following:

General Personal Data	:	<ul style="list-style-type: none"> • Name, surname, nickname, date of birth, gender, age, height, weight, nationality, marital status, military status, photograph. • National ID card number, passport number, photo, personal information on government-issued documents, licenses, or ID cards for identity verification, signature, and other relevant identity verification data. • Address, phone number, email, and social media accounts. • Billing address, bank account information, debit/credit card number, cardholder name, transaction details, and other financial account details. • Communication records between you and the Company, CCTV data, photographs, moving images, and audio. • Geographic location data (GPS), computer identification number (IP Address or MAC Address), device ID, mobile network data, activity log, transaction log, data collected via cookies or similar technologies. • Other information you provide to the Company.
Sensitive Data	:	<ul style="list-style-type: none"> • Religious data. • Racial data. • Biometric data (e.g., facial recognition data, fingerprint scan data). • Criminal records. • Health data, disability data. • Other data that similarly affects the data subject.
Personal Data of Third Parties	:	<p>If you provide the personal data of any third party who is personnel of a legal entity or related to you to the Company (e.g., shareholders, directors, authorized representatives, reference persons, family members, guarantors, mortgagors, and security providers), you are responsible for informing those individuals about the details in this notice and obtaining their consent if necessary, or establishing another legal basis to ensure that the Company can collect, use, and disclose the personal data of these third parties.</p>

Personal Data of Minors, Incompetent, or Quasi-Incompetent Persons		The Company does not intend to collect, use, or disclose the personal data of minors, incompetent, or quasi-incompetent persons unless consent is obtained from the legal guardian, curator, or custodian, or for any actions for which a minor can give consent alone by law (as the case may be), or under other legal bases. If the Company becomes aware that it has collected, used, or disclosed the personal data of a minor, incompetent, or quasi-incompetent person without the consent of their legal guardian, curator, or custodian, and cannot rely on another legal basis, the Company will promptly delete or destroy that personal data.
---	--	---

2. Use of Personal Data

2.1 Legal Basis for Collection, Use, and Disclosure of Personal Data

In collecting, using, and disclosing personal data under this notice, the Company will rely on at least one of the following legal bases to process such personal data:

Contractual Basis	:	When it is for the performance of an agreement in a contract the Company has with you; that is, when the Company needs your personal data to perform a contract or before the Company enters into a contract with you.
Legal Obligation	:	When the Company needs to collect, use, and disclose your personal data to comply with the law or a legal obligation.
Legitimate Interest	:	When the Company collects, uses, and discloses your data for the benefit of the Company or another person as permitted by law, unless the Company's legitimate interests are less important than your fundamental rights.
Consent	:	When you give consent to the Company to collect, use, and disclose your personal data for one or more specific purposes.
Other Legal Bases	:	In some cases, the Company may need to process your personal data under other legal processing bases of data protection law, such as for preventing or suppressing a danger to a person's life, body, or health; for the preparation of historical documents or archives for public interest, or for research or statistics; for the performance of a task carried out in the public interest by the Company; or for the exercising of official authority vested in the Company. The Company will process your personal data as necessary and in accordance with data protection laws.

2.2 Purposes for Collecting, Using, and Disclosing Personal Data

The Company has the following purposes and legal bases for processing personal data under data protection laws. Please consider the nature of the purpose according to your relationship with the Company on a case-by-case basis.

Purpose for Collection, Use, and Disclosure	Legal Basis Used
Processing of Sensitive Data	
<ul style="list-style-type: none">To be used as evidence for identity verification, such as processing data on race, ethnicity, religion, or blood type, and facial recognition data.For processes related to the recruitment and hiring of Company personnel, such as health history, disability information, criminal records, or any other data that similarly affects you as specified by the Personal Data Protection Committee.	<ul style="list-style-type: none">Legal ObligationConsent
Marketing Activities	
<ul style="list-style-type: none">To develop and carry out various marketing-related activities.To communicate with you via email, phone, text message, website, application, social media, or other appropriate electronic channels, including face-to-face communication about products or services of the Company, its business groups, and its affiliates or business partners that may be of interest to you.To send you personalized marketing messages.To allow our business partners to send you information about products or services that may interest you.To study and analyze your use of products or services and to further promote products or services that require your consent by law.To test, research, analyze, and develop new products or services for marketing purposes that require your consent by law.	<ul style="list-style-type: none">Consent
Contractual Performance	
<ul style="list-style-type: none">To assess your qualifications before entering into a contract with the Company as a counterparty, or as a director, representative, attorney-in-fact, or operator on behalf of a legal entity.To approve the execution of a contract between the Company and you or the legal entity for which you are a director, representative, attorney-in-fact, or operator.To perform the contract, including monitoring contract performance, making payments, managing expenses and due interest, receiving or sending information	<ul style="list-style-type: none">Contractual Basis

<p>and documents between you and the Company, debt collection, product delivery, and service provision.</p> <ul style="list-style-type: none"> • For the production, inspection, maintenance, management, and operation of the Company's products and services, such as food and tapioca products. • To facilitate contract performance, such as creating building access cards, managing accidents during goods transportation, ensuring security during contract performance, etc. • To participate in activities organized by or on behalf of the Company, such as lucky draws and Facebook contests. • To establish or exercise contractual claims, such as debt collection. • To manage disputes that have arisen or may arise. • To transfer rights, duties, and any benefits under the contract between you and the Company as a counterparty, or as a director, representative, attorney-in-fact, or operator on behalf of a legal entity, such as in a merger or contract transfer, which is done lawfully. 	
Legal Compliance	
<ul style="list-style-type: none"> • For payment and tax purposes in accordance with the Accounting Act and the Revenue Code. • Processing personal data of data subjects for the purpose of maintaining, caring for, and disclosing important company documents (e.g., shareholder/director meeting documents) in accordance with the Public Limited Companies Act and the Securities and Exchange Act. • To report or disclose information to government agencies as required by law, or upon receiving a summons or seizure order from the police, government agencies, courts, or other law enforcement agencies. • To establish legal claims, exercise legal claims, or defend against legal claims. 	<ul style="list-style-type: none"> • Legal Obligation
Business Relationships and Service Support	
<ul style="list-style-type: none"> • To manage the relationship with you or your business, such as communicating information about products, services, and handling complaints. • For customer relationship management, post-sales transactions, managing complimentary items, or processing your requests. • To ensure your satisfaction and provide you with professional support. • To contact you through various communication channels. • To answer questions and record communications, comments, or complaints. • To act on your instructions or requests, such as requests for data correction, document requests, etc. 	<ul style="list-style-type: none"> • Legitimate Interest • Contractual Basis

Business Development	
<ul style="list-style-type: none"> To carry out business planning, reporting, and forecasting. For the Company's business development, initiating new businesses, launching new services or promotions, gaining deep insights into the use of the Company's services, and preparing internal reports. To serve as a database for the Company. 	<ul style="list-style-type: none"> Legitimate Interest
Security and Risk Management	
<ul style="list-style-type: none"> To prevent crime and maintain security within the Company's buildings and premises, such as exchanging cards before entering building areas and recording images of visitors to the Company's buildings and premises with CCTV. For risk management, audit supervision, and internal organization management. 	<ul style="list-style-type: none"> Legitimate Interest

The Company will not use your personal data for purposes other than those specified in this privacy notice. If the Company needs to collect, use, or disclose your personal data for additional purposes not mentioned here, we will inform you and request your consent before doing so, unless the law permits us to proceed without your consent.

Where the Company relies on a legitimate interest basis, we will consider whether our interests or those of another person override your fundamental rights.

2.3 If You Cannot Provide Personal Data to the Company

In cases where the Company needs to collect your personal data by law or under the terms of a contract between you and the Company, if you do not provide your personal data, the Company may not be able to fulfill its obligations to you or as planned under the contract. However, the Company will inform you of such a case at the time of data collection.

3. Disclosure of Personal Data

To carry out the purposes stated in this notice, the Company may disclose your personal data to the following third parties:

- Subsidiaries, group companies, affiliates, and business partners.
- Agents, contractors/subcontractors, and service providers for any operations, such as transportation providers, document storage and destruction providers, printing houses, marketing activity contractors, advertising media, research companies, recruitment agencies, IT system development and maintenance contractors, accommodation and travel arrangement contractors, payment and payment system providers, auditors, lawyers, legal and tax advisors, and any other consultants.
- Business partners or counterparties with whom the Company has a contract, both domestic and international.
- Government agencies, regulatory bodies, or other authorities as required by law, including officials exercising legal powers.

- Persons who provide guarantees or other securities to secure your debts to the Company.
- Third parties with your consent, or as required by contract or law, as the case may be.
- Any transferees of the Company's rights, duties, and interests, including those assigned by such transferees to act on their behalf (e.g., in cases of corporate restructuring, mergers, or acquisitions).
- Other third parties and agencies to fulfill the purposes stated in this privacy notice.

4. Cross-Boarder Transfer of Personal Data

In some cases, the Company may send or transfer your personal data to a foreign country. If the destination country does not have adequate personal data protection measures equivalent to Thailand, the Company will ensure that appropriate safeguards are in place to make such transfers lawful and compliant with the Personal Data Protection Act B.E. 2562.

5. Retention of Personal Data

5.1 Data Retention Period

The Company will retain your personal data only for as long as necessary for the purposes of collection, use, or disclosure as stated in this privacy notice. However, for the purpose of handling any potential contractual disputes, the Company will retain your personal data for a period of 10 years from the date you are no longer a partner of the Company, unless there are legal, technical, or other reasons according to the Company's internal policies and regulations that require a longer retention period.

5.2 Deletion or Destruction of Personal Data

If the Company no longer needs to retain your data, or when the retention period ends, the Company will delete, destroy, or anonymize the personal data so that it can no longer be linked to you.

6. Exercising Your Rights as a Data Subject

6.1 Your Rights as a Data Subject

You have the following rights under the Personal Data Protection Act:

Right to Withdraw Consent	:	<p>If the Company collects, uses, and discloses your personal data based on your consent, you have the right to withdraw that consent at any time, unless the withdrawal is restricted by law or a contract that benefits you. However, the withdrawal will not affect the lawfulness of processing that was based on consent before its withdrawal.</p> <p>The Company may continue to process your data if there is another legal basis for doing so.</p>
----------------------------------	---	---

Right to Access	:	You have the right to request access to and receive a copy of your personal data that is under the Company's responsibility, and to request disclosure of how the data was obtained without your consent. This right must not adversely affect the privacy rights of others.
Right to Rectification	:	You have the right to request that your personal data be corrected to be accurate, current, and complete.
Right to Data Portability	:	Where the Company has made your personal data available in a commonly used and machine-readable electronic format, you have the right to receive your personal data from the Company and to request that the Company transmit or transfer it to another data controller, where such processing is necessary to comply with the law or a contractual obligation.
Right to Erasure	:	<p>If there is no longer a reasonable basis for the Company to collect, use, or disclose your personal data, you have the right to request that the Company delete, destroy, or anonymize it. However, this is not an absolute right to have all data erased. The Company will carefully consider each request in accordance with any legal requirements related to the processing of your personal data.</p> <p>The Company will proceed with the deletion, destruction, or anonymization within 90 days of receiving the request, unless legally exempt or if it is not possible due to essential necessity.</p>
Right to Object	:	You have the right to object to the collection, use, and disclosure of your personal data that the Company processes based on its legitimate interests. You also have the right to object if the Company processes your data for direct marketing and profiling purposes.
Right to Restrict Processing	:	You have the right to request that the Company temporarily suspend the collection, use, and disclosure of your personal data, for example, when you want the Company to correct your data or to clarify the legal basis for its processing.
Right to Lodge a Complaint	:	You have the right to file a complaint with the Personal Data Protection Committee or a relevant government agency if you believe that the Company or its employees have violated or failed to comply with the Personal Data Protection Act B.E. 2562 or other related announcements.

	<p>You may also contact the Company to complain about how we collect, use, or disclose your personal data. Filing a complaint with the Company does not affect your right to complain to government officials or the Personal Data Protection Committee.</p>
--	--

6.2 Procedure for Exercising Your Rights

You may exercise any of your rights at any time by contacting the Company through the channels specified in **Section 10**.

The Company may need to request specific information from you to verify your identity and ensure your right to access your personal data or to exercise any other right. This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it.

The Company may also contact you to ask for further information in relation to your request to speed up our response. We will endeavor to respond to all legitimate requests within 30 days. Occasionally, it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated on the status of your request.

7. Security Measures for Personal Data

The Company has established appropriate security measures to protect personal data against loss, unauthorized access, use, alteration, correction, or disclosure.

In cases where the Company assigns another person to process personal data on its behalf, the Company will properly supervise that person to ensure that they maintain the security of your personal data in accordance with the Personal Data Protection Act B.E. 2562.

8. Your Duties

You have a duty to ensure that the personal data you provide to the Company, whether by yourself or on your behalf, is accurate and up-to-date, and you must inform the Company as soon as possible if there are any changes.

In cases where you enter into a contract with the Company or have certain legal relationships with us, you may be required to provide certain personal data, such as contact information and payment details, so that you can receive your legal or contractual rights. Failure to comply with this duty may result in the loss of your legal or contractual rights.

9. Accessing Other Websites via the Company's Website

The Company's website may contain links to third-party websites. These third parties may collect certain personal data about the data subject's use of their services. Therefore, if you visit other websites, even through the Company's website, the protection of your personal data will be governed by the privacy notice of that website, which is not related to the Company. The Company cannot be responsible for the security or privacy of any of your information collected by such third-party websites. For this reason,

the Company recommends that you exercise caution and review the privacy notices of those third-party websites, products, and services.

10. Company's Contact Channels

If you have any questions or would like more details about personal data protection, the collection, use, or disclosure of your personal data, or exercising your rights, you can contact the Company at:

- **Thai Wah Public Company Limited**

Address: 21/11, 21/13 Thai Wah Tower 1, 6th Floor, South Sathorn Road, Thung Maha Mek, Sathon, Bangkok 10120

Phone: +66 (0) 2285 0040

- **Personal Data Protection Working Group**

Email: Legal@thaiwah.com

11. Amendment of the Privacy Notice

The Company regularly reviews and revises this privacy notice. Therefore, the Company may amend this notice from time to time to ensure that your personal data is appropriately protected. If this notice is significantly amended, the Company will inform you by publishing the changes through appropriate channels.

12. Other Relevant Privacy Notices

As the Company processes your personal data for various purposes depending on your relationship with us, if you have a relationship with the Company as a partner, customer, employee, intern, job applicant, internship applicant, or investor, or as a user of our website, you can read the relevant specific privacy notices for more details to understand all the specific purposes for processing your personal data according to your relationship with the Company on the Company's website or at:

<https://www.thaiwah.com/en/corporate-governance/corporate-policies-documents>