



Document Name: Personal Data Protection Policy

Document Number: AWC/EDA/AWCCENTER/2021/POL001
(By virtue of the resolution of the Board of Directors' meeting No. 6/2021)

Effective Date: 10 August 2021

PERSONAL DATA PROTECTION POLICY

1. OBJECTIVES AND SCOPE OF ENFORCEMENT OF THE POLICY

- 1.1 **The companies**, as listed in the “List of Companies within the Group for the Purpose of Personal Data Protection Operations” (collectively referred to as the “**Companies**”) have prepared this policy to serve as a guideline in ensuring that operations of the Companies are in compliance with the requirements and guidelines relating to the Personal Data protection under Personal Data Protection Act B.E. 2562.
- 1.2 All employees and personnel of the Companies are obliged to acknowledge, understand, and strictly comply with this policy. Failure to comply with the requirements and guidelines for the protection of Personal Data by the Companies’ employees or personnel shall be deemed a violation of the Companies’ key employment-related policies, and the Companies reserve the right to impose penalties as appropriate.
- 1.3 This policy extends to representatives of the Companies, persons acting on behalf of the Companies, people who work with the Companies, and all contracting parties of the Companies. The Companies shall disseminate the policy and communicate measures to protect Personal Data in various forms to such persons. If such persons fail to comply with the requirements and guidelines for the protection of Personal Data, the Companies may consider canceling their representation, terminating the contracts, or taking other actions as appropriate.
- 1.4 In the business operations of the Companies, the Companies collect, use, and disclose the Personal Data of the service users of the Companies, the natural persons who contact with the Companies, and the employees of the Companies.


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- 1.5 This policy shall apply to the Companies' business operations, activities, or processes, including the Companies' operations as employers. This policy shall be used as a guideline for the collection, use, and disclosure of all categories of Personal Data, whether in the form of a hard copy document or data stored in electronic formats.
- 1.6 This policy is part of the Data Governance Framework, under the responsibility of the Data Governance Department, which is the department responsible for managing Personal Data in accordance with the requirements of this policy. Furthermore, for ensuring that the Companies' Personal Data processes are in accordance with this policy and the Personal Data Protection Act B.E. 2562, the Companies have appointed a Data Protection Officer to advise and monitor the operations relating to Personal Data of the Companies and also assigned the Compliance Department to supervise the Companies' Personal Data processes so as to be in accordance with this policy and the Personal Data Protection Act B.E. 2562. Additionally, the Internal Audit Division is responsible for the internal audit of the Personal Data processes so as to be in accordance with this policy and the Personal Data Protection Act B.E. 2562
- 1.7 The policy guidelines and procedures as set forth in the List of Policies/Standard Practices, Attachment 1, and/or the policies relating to data established by the Data Governance Department, shall be applied to the management of Personal Data so far as they are applicable so as the management of the Personal Data of the Companies be in accordance with this policy.

2. DEFINITIONS

Unless otherwise specified, the following terms mentioned or specified in this policy shall have the meanings set forth below:





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“Use of Personal Data in a High-Risk Manner”	means	the use of Personal Data that carries a high risk of affecting the rights and freedoms of a natural person who is the Data Subject. This is based on the level of information risk contained in the Companies’ Guidelines for the Cases of Personal Data Infringement, along with the explanation of the Personal Data impact assessment.
“Biometric Data”	means	Personal Data resulting from the use of technique or technology in processing physical, physiological, or behavioral characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as facial images, dactyloscopy data, or fingerprint data.
“Personal Data”	means	any information relating to a natural person which enables the identification of such natural person, whether directly or indirectly, but not including the information of a deceased person.
“Sensitive Personal Data”	means	Personal Data pertaining to race, ethnic origin, political opinion, cult, religious or philosophical belief, 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.





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“Data Subject”	means	a natural person who is the owner of Personal Data that is collected, used, or disclosed by the Data Controller or the Data Processor (as the case may be).
“Data Protection Officer”	means	the person with expertise in Personal Data protection law who is appointed by the Chief Executive Officer and President or Management Committee (MCOM) to be responsible for monitoring and advising the Companies’ operations in relation to compliance with the Personal Data Protection Act B.E. 2562, including coordinating and cooperating with the Office of the Personal Data Protection Committee concerning the Companies’ problems in relation to the collection, use, or disclosure of Personal Data.
“Data Controller”	means	a natural or juristic person having the powers and duties to make decisions regarding the collection, use, and disclosure of Personal Data.
“Data Processor”	means	a natural or juristic person who operates in relation to the collection, use, or disclosure of Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such natural or juristic person is not the Data Controller.





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3. RIGHTS AND THE EXERCISE OF RIGHTS OF A DATA SUBJECT

3.1 Rights of a Data Subject

A Data Subject has the protected rights under the Personal Data Protection Act B.E. 2562 as follows:

3.1.1 Right to withdraw consent

In the case that the Companies have requested the consent to collect, use, or disclose Personal Data and obtained consent for collect, use, or disclose Personal Data for a specific purpose from a Data Subject, the Data Subject has the right to withdraw its consent for the Companies to process such data at any time by notifying the Companies, in writing.

Upon receipt of the Data Subject's request to exercise its right to withdraw consent, the Companies shall stop their processing of the Personal Data immediately. The Companies shall inform the Companies' decision to the Data Subject within 30 days of the date of receipt of the request form from the Data Subject.

3.1.2 Right to request access and to obtain copies of the Personal Data of the Data Subject collected by the Companies

A Data Subjects has the right to request access and to obtain copies of their Personal Data collected by the Companies, according to the rules prescribed by the Personal Data Protection Committee¹.

¹ The Personal Data Protection Committee has yet to announce a regulation in this area.





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When the Companies receive such a request from a Data Subject, the Companies shall consider the appropriate means to deal with such request within 30 days of the date of receipt thereof. However, the Companies reserve the right to refuse the request of the Data Subject if such refusal is in accordance with the law or court order, or if access to and obtaining a copy of the Personal Data may cause damage to the rights and freedoms of other persons.

3.1.3 Right to request for disclosure of the acquisition of Personal Data that the Companies obtained from other sources

In the case that the Companies obtain the Personal Data of a Data Subject from a source other than from the Data Subject directly, if the Companies intend to use such data, the Companies shall inform the Data Subject within 30 days of the date of such collection (unless it falls within the legal exemptions). In this case, the Data Subject shall be able to request the Companies to disclose the source from which their Personal Data has been obtained.

3.1.4 Right to obtain Personal Data or request the Companies to transfer or forward the Personal Data of a Data Subject to another Data Controller, in the event that the Companies transform the data of the Data Subject into a format that can be read or used by an automated device and can be transferred by automatic means.

The transfer or forwarding of Personal Data in this Article shall refer to the case where the Personal Data is retained in an electronic format and the transfer or forwarding can be done through electronic devices that can read electronically formatted data only. It does not include the right to request the Companies to send the Personal Data of a Data Subject that is in other formats.

When the Companies receive such a request from a Data Subject, the Companies shall consider the appropriate means to deal with such request within 30 days of the date of





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receipt thereof. However, the Companies reserve the right to refuse the request of the Data Subject if the exercise of such rights may cause damage to the rights and freedoms of other persons.

3.1.5 Right to object to the collection, use, and disclosure of Personal Data of a Data Subject

A Data Subject has the right to object to the collection, use, and disclosure of its Personal Data by notifying the Companies in writing, in the following circumstances:

- (1) The collection of Personal Data in the case where the consent from the Data Subject is not required because it is necessary for the legitimate interests of the Companies or another juristic person who is not the Data Controller; this is unless the Data Controller can prove overriding legitimate grounds for the collection, use, or disclosure of the Personal Data; or
- (2) The collection, use, or disclosure of Personal Data for the purpose of direct marketing.

When the Companies receive this request from a Data Subject, the Companies shall immediately separate the Personal Data of the Data Subject from the other data. However, the Companies reserves the right to reject the request if the Companies can prove that the collection of Personal Data in the case where the consent from the Data Subject is not required because it is necessary for the legitimate interest of the Companies was based on overriding legitimate grounds, or the collection was for the establishment of legal rights, the compliance with law or exercise of legal claims, or for raising the defense of legal claims. The Companies shall inform the Data Subject of their decision within 30 days of the date of receipt of the request form from the Data Subject.

3.1.6 Right to request the Companies to destroy or make Personal Data unidentifiable





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A Data Subject has the right to request the Companies to destroy its Personal Data and/or to make it unable to identify identity of the Data Subject, in the following circumstances:

- (1) When it is no longer necessary to retain the Personal Data according to the specific purpose;
- (2) When the Data Subject withdraws the consent to collect, use or disclose of the Personal Data and the Companies have no legal grounds for the collection, use, or disclosure of such Personal Data;
- (3) When the Data Subject objects to the collection, use, or disclosure of the Personal Data and the Companies do not have grounds to refuse; or
- (4) When the Personal Data has been unlawfully collected, used, or disclosed.

When the Companies receive such a request from a Data Subject, the Companies shall consider the appropriate means to deal with such request within 30 days of the date of receipt thereof. However, the Companies reserve the right to reject such a request if it is necessary and the Companies have legitimate grounds according to the law to reject such a request.

3.1.7 Right to request the Companies to suspend the use of Personal Data of a Data Subject

A Data Subject has the right to request the Companies to immediately suspend the use of its Personal Data, by notifying the Companies in writing, in the following circumstances:

- (1) When the Data Controller is in the process of verifying for accuracy and completeness, or updating Personal Data at the request of the Data Subject;
- (2) When the Personal Data may be erased or destroyed but the Data Subject wants to suspend the use of the Personal Data instead of the erasure or destruction thereof;





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- (3) When it is no longer necessary to retain the Personal Data according to the specific purpose, but it is necessary for the Data Subject to request that such Personal Data be retained for the establishment of legal rights, the compliance with law or exercise of legal claims, or for raising the defense of legal claims; or
- (4) When the Companies are in the process of considering the objection to the collection, use, or disclosure of Personal Data by the Data Subject.

The Companies shall inform the Data Subject of their decision within 30 days of the date of receipt of the request form from the Data Subject.

- 3.1.8 Right to request the Companies to rectify the Personal Data of a Data Subject to be accurate, current, complete, and not cause misunderstanding

In the case that any change occurs which may affect the Personal Data that the Data Subject has provided to the Companies or that the Companies have collected, if it is still within the retention period of the Personal Data as set out in the Companies' Summary Chart on Personal Data Collection and Data Flow (Data Mapping), the Data Subject may request the Companies to rectify or update its Personal Data at any time.

- 3.1.9 Right to complain in the case of breach of requirements according to the Personal Data Protection Act B.E. 2562

If a Data Subject finds that there is any breach or violation of the Personal Data Protection Act B.E. 2562 by the Companies and/or its employees, the Data Subject may make a complaint to the Companies and/or to the relevant government entity, as per the details provided in Article 15 of this policy.

- 3.2 Exercise of the Rights of the Data Subject





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If the Data Subject (including employees and personnel of the Companies with the status of Data Subject) wishes to exercise the rights as specified in Article 3.1 above, the Data Subject can submit a request to the Companies at any time via the channels convenient to the Data Subject as per the details provided in Article 15 of this policy.

4. COLLECTION OF PERSONAL DATA

4.1 Collection of Personal Data

In collecting Personal Data, the employees and personnel of the Companies shall ensure that they comply with the following principles:

4.1.1 Employees and personnel of the Companies shall collect Personal Data only to the extent necessary for the legitimate purposes which are notified to the Data Subject before or at the time of collection of the Personal Data.

In collecting Personal Data, the employees and personnel of the Companies shall ensure that they comply with the following guidelines, at any time:

4.1.2 Before the collection, use, or disclosure of Personal Data, the employees and personnel of the Companies shall consider the following factors:

- (1) Whether the Personal Data to be collected, used, or disclosed is necessary to be collected, used, or disclosed for the main purpose of the Companies' businesses; and
- (2) Whether the Personal Data to be collected, used, or disclosed will be collected, used, or disclosed for the purposes that the law allows the collection, use or disclosure without having to obtain consent, or whether consent has to be obtained.

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4.1.3 Before or at the time of the first collection of the Personal Data from the Data Subject, the employees and personnel of the Companies shall always notify the Data Subject of the following details:

- (1) The purpose of the collection of the Personal Data for use or disclosure;
- (2) Reason and necessity for obtaining the Personal Data, including the possible effects of not providing such Personal Data;
- (3) The Personal Data to be collected and the period for which the Personal Data shall be retained;
- (4) The categories of individuals or entities to whom or which the collected Personal Data may be disclosed;
- (5) The information, address, and contact channel details of the Companies, as the Data Controller; and
- (6) the rights of the Data Subject as mentioned in Article 3 of this policy.

4.1.4 In the event that the employees and personnel of the Companies will use the Personal Data for any purposes other than those already informed to the Data Subject, the employees and personnel of the Companies must inform the Data Subject of the new purposes and obtain consent before any collection occurs, unless it is a case where such action is not required by law.

4.2 Methods for collection of Personal Data

In collecting Personal Data, the employees and personnel of the Companies shall act according to the following procedures:



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4.2.1 Collection of Personal Data that does not require consent from the Data Subject before or at the time of collection

- (1) The employees and personnel of the Companies may collect Personal Data, which is not Sensitive Personal Data, that is necessary for the use of or disclosure by the Companies without obtaining consent from a Data Subject if the purpose of the collection falls within the following:
 - (a) It is for the achievement of purposes related to the preparation of historical documents or archives for the public interest, or in connection with studies, research, or statistics, in which appropriate safeguards have been provided to protect the rights and freedoms of the Data Subject, as prescribed by the Personal Data Protection Committee;
 - (b) It is for preventing or suppressing danger to an individual's life, body or health;
 - (c) 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 such contract;
 - (d) It is necessary for the performance of duty or taking any action according to the order of an official authority or as required by law;
 - (e) It is necessary for the legitimate interests of the Companies, as the Data Controllers, or any individuals or juristic persons other than the Data Controller, except where such interests are overridden by the fundamental rights related to the Personal Data of the Data Subject; or
 - (f) It is for compliance with a law to which the Companies are subject.


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- (2) The employees and personnel of the Companies may collect Sensitive Personal Data which is necessary for the use of or disclosure by the Companies without obtaining consent from the Data Subject if the purpose of the collection falls within the following:
- (a) It is for preventing or suppressing danger to an individual's life, body, or health, where the Data Subject is incapable of giving consent for whatever reason;
 - (b) It is carried out in the course of legitimate activities with appropriate safeguards by foundations, associations, or labor unions, for their members, former members, or persons having regular contact with such foundations or associations, without disclosing the Personal Data outside of such foundations or associations;
 - (c) It is information that is disclosed to the public with the explicit consent of the Data Subject;
 - (d) It is necessary for the establishment of legal rights, the compliance or exercise of legal claims, or for raising the defense of legal claims; or
 - (e) It is necessary for compliance with a law to achieve the purposes with respect to:
 - i. Preventive or occupational medicine, the assessment of the working capacity of an employee, medical diagnosis, the provision of health or social care, medical treatment, the management of health or social care systems and services; in the event that it is not for compliance with the law, and such Personal Data is under the responsibility of an occupational or professional practitioner or a person having the duty


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to keep such Personal Data confidential under the law, it must be for compliance with a contract between the Data Subject and a medical practitioner;

- ii. Public interest in public health, such as protecting against dangerous contagious diseases or epidemics which may be contagious or pestilent in Thailand, or ensuring standards or quality of medicines, medicinal products, or medical devices, on the basis that there is a provision of suitable and specific measures to safeguard the rights and freedoms of the Data Subject, particularly maintaining the confidentiality of Personal Data in accordance with the duties of professional ethics;
- iii. Employment protection, social security, national health security, social health welfare of the persons entitled by law, road accident victims' protection, or social protection in which the collection of Personal Data is necessary for exercising the rights or carrying out the obligations of the Data Controller or the Data Subject, by providing suitable measures to protect the fundamental rights and interests of the Data Subject;
- iv. Scientific, historical, or statistical research purposes, or other public interests, which must be carried out only to the extent necessary to achieve such purposes, and in which suitable measures have been provided to protect the fundamental rights and interests of the Data



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Subject as prescribed by the Office of the Personal Data Protection Committee²; or

- v. Substantial public interest, by providing suitable measures to protect the fundamental rights and interests of the Data Subject.

4.2.2 Consent and the collection of Personal Data that requires consent

If the Personal Data which the employees and personnel of the Companies wish to collect for use does not fall within the purposes mentioned in Article 4.2.1 above, the employees and personnel of the Companies must seek to obtain explicit consent by the following means from the Data Subject before collecting the Personal Data (unless consent cannot be obtained by such means because of the nature of the circumstances).

- (1) Collection of Personal Data in a hard copy document format

In collecting Personal Data in a hard copy document format, the employees and personnel of the Companies shall prepare the **Consent Form for Collection, Use, and/or Disclosure of Personal Data** for consent from the Data Subject.

- (2) Collection of Personal Data in electronic format

In the case of collecting Personal Data in electronic format, the employees and personnel of the Companies shall prepare a consent request to be used for obtaining consent. In this regard, if the employees and personnel of the Companies require the Data Subject to check an acceptance box in order to give consent, the employees and personnel of the Companies must not set a default check in the box

² The Personal Data Protection Committee has yet to announce a regulation in this area.





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that the Data Subject must submit to confirm/accept any conditions (no default setting on check box).

At any time, the consent obtained must be freely given on a voluntary basis by the Data Subject. The employees and personnel of the Companies shall not make the collection of unnecessary Personal Data a condition for the usage of the Companies' services.

4.2.3 Obtaining consent from a minor, quasi-incompetent person, or incompetent person

If the employees and personnel of the Companies have contact with or are required to obtain the Personal Data of a minor, quasi-incompetent person, or incompetent person, the Companies must seek to obtain consent from the person who legally acts on behalf of such person, as set out below.

Person who lacks the legal ability to give consent by themselves	Persons who may legally act on behalf of the person who lacks the legal ability	Supporting documents, for consideration
<p style="text-align: center;">Minor</p> <p>(in the case of a minor under the age of 10, or in the case where the given consent is not a transaction to which a minor could consent by itself, as prescribed by the Civil and Commercial Code)</p>	<p style="text-align: center;">Guardian</p>	<p>the birth certificate and the marriage certificate of the father and mother, or the order of the competent court appointing the guardian</p> <p>(for appointment of the guardian)</p>





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Person who lacks the legal ability to give consent by themselves	Persons who may legally act on behalf of the person who lacks the legal ability	Supporting documents, for consideration
Incompetent person	Custodian	the order of the competent court appointing the custodian (for appointment of the custodian)
Quasi-incompetent person	Curator	the order of the competent court appointing the curator (for appointment of the curator)

The employees and personnel of the Companies shall request supporting documents as listed above in order to verify the identity of the person who legally acts on behalf of the person who lacks legal ability in exercising rights.

4.3 Category of collected Personal Data, purposes for the collection of Personal Data, and retention period of the collected Personal Data

In collecting Personal Data, the employees and personnel of the Companies shall specify the category of Personal Data collected, purposes for collection, and the retention period of the Personal Data. The Companies have prepared and maintained a **Record of the Personal Data Activities of the Companies (Data Log)** which records the category of the Personal Data, purposes





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for collection, and retention period of the Personal Data which the Companies have collected, used, or disclosed. The employees and personnel of the Companies have the duty to regularly rectify, amend, and update such a record to be accurate and up to date at all times.

5. COLLECTION OF PERSONAL DATA FROM SOURCES OTHER THAN THE DATA SUBJECT

The employees and personnel of the Companies shall always collect Personal Data directly from the Data Subject and shall not collect Personal Data from any other source, except where:

- 5.1 the Companies are qualified for exceptions as specified in Article 4.2.1 of this policy (which corresponds to Sections 24 and 26 of the Personal Data Protection Act) and so allowed to collect Personal Data from sources apart from the Data Subject; or
- 5.2 it is necessary for the Companies to collect Personal Data from sources other than the Data Subject of the Personal Data. The collection, use, and disclosure, of such Personal Data shall require consent, and the Companies shall proceed in the following manner:
 - 5.2.1 In the event that the Companies have obtained consent to collect the Personal Data, the employees and personnel of the Companies shall notify the Data Subject of the collection of data from other sources within 30 days from the receiving date of consent. Additionally, the Companies must provide details as specified in Article 4.1.3, including details on the new purposes for collection, use, or disclosure of such Personal Data (if any), within 30 days from the date of the collection of the data, unless the Companies are exempted from the requirement to notify the Data Subject about the new purposes and details concerning the collection, use, or disclosure of the Personal Data by law. In this regard,
 - (a) If the collected Personal Data is to be used for communication with the Data Subject, the employees and personnel of the Companies shall notify the Data Subject of the collection of the Personal Data from other sources at the time of the





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first communication with that Data Subject, and also notify details as specified in Article 4.1.3, including details on the new purposes for collection, use, or disclosure of such Personal Data shall also be provided within 30 days from the date of the collection of the data unless the Companies are exempted from the requirement to notify the Data Subject about the new purposes and details concerning the collection, use, or disclosure of the Personal Data by law.

- (b) If the Companies will disclose the collected Personal Data to another party, the employees and personnel of the Companies shall provide a notice informing the Data Subject of the collection of the Personal Data prior to the time of the first disclosure. The details as specified in Article 4.1.3, including details on the new purposes for collection, use, or disclosure of such Personal Data shall also be provided within 30 days from the date of the collection of the data unless the Companies are exempted from the requirement to notify the Data Subject about the new purposes and details concerning the collection, use, or disclosure of the Personal Data by law.

5.2.2 The Companies are exempted from the requirement to notify the new purposes and details concerning the collection, use, or disclosure of the Personal Data by the law in the following circumstances:

- (a) The Data Subject is already aware of the new purposes or the details.
- (b) The Data Controller can prove that the notification of such new purposes or details are not feasible or shall impede the use or disclosure of the Personal Data, especially to achieve objectives related to scientific, historical, or statistical research. In this case, the Companies shall take appropriate measures to protect the rights, freedoms, and interests of the Data Subject.

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- (c) The use or disclosure of the Personal Data must be carried out urgently, as required by law, and there are appropriate measures to protect the interests of the Data Subject.
- (d) The Companies gain knowledge of or obtain the Personal Data as part of the Companies' duties, occupations, or professions, and must keep the new purposes or certain details under Section 23 confidential as required by law.

6. USE OF PERSONAL DATA

6.1 General principles for the use of Personal Data

In using any Personal Data collected by the Companies, the employees and personnel of the Companies shall operate in accordance with the following principles and guidelines, at any time:

- 6.1.1 The employees and personnel of the Companies shall use Personal Data only for the purposes notified to the Data Subject.
- 6.1.2 For the Personal Data that the Companies can collect without consent from the Data Subject, as mentioned in Article 4.2.1, the employees and personnel of the Companies shall use such data only for the specific purposes as mentioned in Article 4.2.1.
- 6.1.3 The employees and personnel of the Companies shall keep a record of the use of Personal Data collected by the Companies in the **Record of the Personal Data Activities of the Companies (Data Log)**.

6.2 Access to Personal Data

The employees and personnel of the Companies acknowledge that the Companies have set the conditions and methods of accessing the Personal Data that the Companies have collected for use or disclosure in accordance with the purposes of which the Data Subject has been informed in the Summary Chart on Personal Data Collection and Data Flow (Data Mapping).

The logo for Asset World Corporation features a stylized mountain peak or pyramid shape composed of horizontal lines, with the text "ASSET WORLD CORPORATION" centered below it.

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6.3 Data protection impact assessment

The employees and personnel of the Companies shall arrange for a data protection impact assessment each time the Companies carry out the Use of Personal Data in a High-Risk Manner. The assessment shall be carried out according to the **Data Protection Impact Assessment Form**.

7. **RETENTION OF PERSONAL DATA AND METHODS FOR MAINTENANCE AND PROTECTION OF PERSONAL DATA**

7.1 Recording details of Personal Data

7.1.1 For the Companies' operations, the employees and personnel of the Companies shall prepare a Summary Chart on Personal Data Collection and Data Flow (Data Mapping) for each department in the Companies for use in recording and displaying the summary of Personal Data collected and the purposes for which each category of Personal Data is collected, as well as the period of retention of each category of Personal Data.

7.1.2 The employees and personnel of the Companies shall prepare a **Record of the Exercise of the Rights of the Data Subject**, which shall record details about the exercise of the rights of the Data Subject and details of the Companies' actions in response to the requests to exercise rights, including cases where the Companies refuse the request of the Data Subject.

7.2 Methods for maintaining Personal Data

7.2.1 The employees and personnel of the Companies shall ensure that any process related to Personal Data that the Companies collected is carried out with appropriate protection, and is safe from loss, use, access, alteration, or disclosure of Personal Data by unauthorized persons, or any unlawful actions.





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7.2.2 The employees and personnel of the Companies have the duty to ensure the security of Personal Data, including the creation of and compliance with security protection standards for Personal Data regarding access or control of the use of Personal Data, including administrative safeguard measures, technical safeguard measures, and physical safeguard measures, which shall at least include:

- (1) Measures to control access to the Personal Data and the equipment which has been used for storage and processing the Personal Data;
- (2) Requirements relating to the permission or right to access to the Personal Data;
- (3) Management of the access to the Personal Data to control unauthorized access, disclosure, knowledge, or copying of the Personal Data, or theft of storage or processing devices; and
- (4) Establishment of measures to track activities relating to access, change, erasure, or transfer of Personal Data, that are appropriate to the methods and media used in the collection, use, and disclosure of Personal Data.

7.2.3 The employees and personnel of the Companies shall keep the Personal Data in a secure place that is properly managed and suitable for the form (paper or electronic) of the Personal Data being retained.

7.2.4 The employees and personnel of the Companies acknowledge that the Companies limit access to Personal Data to persons who have duties and responsibilities related to data processing, as determined by the Companies and shown in the Summary Chart on Personal Data Collection and Data Flow (Data Mapping). Such persons can take actions in regard to the Personal Data only in accordance with the duties and orders of the Companies and must keep the Personal Data of the Data Subject confidential.

8. DISCLOSURE OF PERSONAL DATA


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8.1 General principles for the disclosure of Personal Data

In disclosing any Personal Data collected by the Companies, the employees and personnel of the Companies shall operate in accordance with the following principles and guidelines of the Companies at any time:

- 8.1.1 The Companies shall disclose Personal Data only for the purposes notified to the Data Subject.
- 8.1.2 For the Personal Data that the Companies can collect without consent from the Data Subject, as mentioned in Article 4.2.1, the Companies shall disclose such Personal Data only for the specific purposes as mentioned in Article 4.2.1.
- 8.1.3 The Companies shall keep a record of the disclosure of Personal Data collected by the Companies in the **Record of the Personal Data Activities of the Companies (Data Log)**.

8.2 Disclosure of Personal Data to the Companies' Data Processors

- 8.2.1 The employees and personnel of the Companies acknowledge that, in operating the Companies' businesses, the Companies may assign persons other than the Companies' personnel to perform certain tasks in accordance with the orders and scope of work determined by the Companies. If such persons are required to process Personal Data that the company has collected for use as part of task performance pursuant to the Companies' purpose and order, such persons are considered to be the Companies' Data Processors.
- 8.2.2 In entrusting the Companies' Data Processors to process Personal Data, the employees and personnel of the Companies shall require the Data Processors' compliance with the instructions and operating conditions in relation to the protection of Personal Data in accordance with good Personal Data protection policies and standards and in accordance with the provisions of the Personal Data Protection Act B.E. 2562 and related regulations. Additionally, the employees and personnel of the Companies shall also ensure that the





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Companies enter into a data processing agreement with the Data Processor, containing clear provisions for the Data Processor to use their best efforts to protect the Personal Data.

8.3 Disclosure of Personal Data to other Data Controllers

8.3.1 The employees and personnel of the Companies acknowledge that other Data Controllers are third parties who are not the Companies, whether they be natural or juristic persons, having the authority to make decisions about the collection, use, or disclosure of Personal Data by themselves.

8.3.2 The employees and personnel of the Companies are to transmit or disclose the Personal Data of a Data Subject to other third parties only in cases in accordance with Article 4.2.1 (1) for general Personal Data and Article 4.2.1(2) for Sensitive Personal Data.

8.3.3 In transmitting or disclosing the Personal Data to other Data Controllers, the employees and personnel of the Companies shall notify the Data Subject of the Personal Data to be disclosed and the purpose and reason for the disclosure, together with the name of the other Data Controller, except in cases in accordance with Article 4.2.1(1) for general Personal Data and Article 4.2.1(2) for Sensitive Personal Data.

9. TRANSFER OF PERSONAL DATA ABROAD

9.1 If it is necessary for the Companies to transmit or disclose the Personal Data of the Data Subject to a recipient located abroad, the employees and personnel of the Companies shall proceed as follows:

9.1.1 The employees and personnel of the Companies shall verify whether the destination country where the recipient of Personal Data is located has adequate Personal Data protection laws and standards for Personal Data protection at the same level or better than Thailand's Personal Data protection standards that are in force at the time that such Personal Data is to be transmitted or disclosed. The employees and personnel of the Companies shall





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proceed by considering the criteria for the protection of Personal Data as prescribed by the Personal Data Protection Committee.³

If there is an issue regarding whether the Personal Data protection standards of the destination country are adequate, the employees and personnel of the Companies shall contact and submit the matter to the Personal Data Protection Committee for comment and decision on the matter.

- 9.1.2 Only in the case that the destination country of the recipient has adequate Personal Data protection laws and Personal Data protection standards, the employees and personnel of the Companies may transmit or disclose the Personal Data of the Data Subject to a recipient located abroad.
- 9.1.3 If the destination country of the recipient has inadequate Personal Data protection laws and Personal Data protection standards, the employees and personnel of the Companies shall refuse to and not transmit or disclose the Personal Data of the Data Subject to a recipient, unless:
- (1) It is for compliance with the law;
 - (2) The Companies have informed the Data Subject that the Personal Data protection standards of the destination country where the recipient of the Personal Data is located are inadequate according to the criteria for the protection of Personal Data as prescribed by the Personal Data Protection Committee, and have obtained consent from the Data Subject to transmit or disclose Personal Data to the recipient in the destination country;

³ The Personal Data Protection Committee has yet to announce a regulation in this area.


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- (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 such contract;
- (4) It is for compliance with a contract between the Companies and other natural or juristic persons for the interests of the Data Subject;
- (5) It is to prevent or suppress danger to the life, body, or health of the Data Subject or other persons, when the Data Subject is incapable of giving consent at such time; or
- (6) It is necessary for carrying out activities in relation to a substantial public interest.

9.1.4 When the employees and personnel of the Companies transmit or disclose the Personal Data of the Data Subject to a recipient, the employees and personnel of the Companies shall record such action, including the reason and necessity for the transmission or disclosure of that Personal Data in the **Record of the Personal Data Activities of the Companies (Data Log)**.

10. DESTRUCTION OF PERSONAL DATA

- 10.1 The employees and personnel of the Companies have the duty to erase or destroy Personal Data after the expiration of the retention period specified for each category of data, when the Personal Data is no longer necessary for the purposes of the Companies or the relevant law for collection, use, or disclosure of such data, or upon the request of the Data Subject. This shall be in accordance with the methods and conditions specified in the Data Governance Framework.
- 10.2 The document unit/unit that controls the documents of the Companies shall have the duty to examine and separate the Personal Data that has completed its retention period and destroy the documents according to the following methods and requirements:





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10.2.1 If the Personal Data is maintained in hard copy documents, the destruction of such data shall be carried out by the use of a paper shredder.

10.2.2 If the Personal Data is stored in electronic files, the document unit/unit that controls the documents of the Companies shall contact the IT division of the Companies in order to destroy the corresponding electronic files.

11. TRAINING OF RELEVANT PERSONNEL AND THE PROVISION OF INFORMATION RELATING TO THE PRACTICE OF PERSONAL DATA PROTECTION TO THE COMPANIES' PARTNERS OR SERVICE USERS

The Companies shall provide training and knowledge to the Companies' personnel, in order for the personnel to understand, acknowledge, realize the importance of, and be able to operate in accordance with the requirements and guidelines on the protection of Personal Data appropriately and accurately.

12. MONITORING AND IMPROVING THE COMPANIES' OPERATIONS REGARDING PERSONAL DATA

The Companies shall develop and improve upon the policies and documents related to the protection of Personal Data each time the relevant laws are updated or whenever the Companies amend their internal practices.

13. PERSONAL DATA BREACH

13.1 In the event that any employees or personnel of the Companies find or there are reasonable grounds to suspect that there may be leakage of Personal Data or operations in connection with the collection, use, or disclosure of Personal Data by the Companies that are contradictory to or not in compliance with the requirements of the Personal Data Protection Act B.E. 2562 and/or any regulations related to the protection of Personal Data or requirements under this policy, the





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employees or personnel of the Companies have the duty to notify the Companies of such cases via the channels specified in Article 15 of this policy.

- 13.2 In the event of a Personal Data leak or the occurrence of operations in connection with the collection, use, or disclosure of Personal Data by the Companies that are contradictory to or not in compliance with the requirements of the Personal Data Protection Act B.E. 2562 and/or any regulations related to the protection of Personal Data or requirements under this policy, the employees and personnel of the Companies shall comply with the requirements and procedures specified in the **Guidelines for the Cases of Personal Data Breach** within a reasonable time period.
- 13.3 The Companies shall support that the risk management of the organization and related units takes into consideration risks relating to Personal Data and implements appropriate risk management procedures, as well as having the internal audit department audit operations relating to Personal Data.

14. DATA PROTECTION OFFICER

The Companies, by the Chief Executive Officer and President or Management Committee (MCOM), have appointed a Data Protection Officer to advise and monitor operations of the Companies in relation to the collection, use, and disclosure of Personal Data so as to be in compliance with the Personal Data Protection Act B.E. 2562 and relevant regulations. The Companies have prepared a summary of duties, responsibilities, and scope of work authority of the Data Protection Officer in the **Summary of Duties, Responsibilities, and Primary Qualifications of the Data Protection Officer and Internal Units of the Companies Related to Personal Data Protection**, so that the Data Protection Officer and related persons can perform their tasks effectively and consistent with the purposes as required by Personal Data protection law.

15. CONTACT WITH THE COMPANIES





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15.1 The employees and personnel of the Companies acknowledge that, if a Data Subject (including employees and personnel of the Companies with the status of Data Subject) wishes to exercise any rights of the Data Subject as described in Article 3 of this policy, the Data Subject can notify its intention to exercise such rights to the Companies via the following contact channel:

Companies' Personal Data Protection Unit

Data Protection Officer: Siwate Rojanasoonthorn (Dr.)

Contact: <https://www.assetworldcorp-th.com/en/home>

Channel: Please specify the subject for contact as "Data Subject's Rights Request"

Address: Asset World Corp Public Company Limited
54th Floor, Empire Tower, 1 South Sathorn Road,
Yannawa Sub-district, Sathorn District, Bangkok 10120

The logo for TCC Group features a stylized red and white mountain peak above the text "BUILDING A BETTER FUTURE" in a bold, sans-serif font.

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15.2 In the case that a Data Subject (including employees and personnel of the Companies with the status of Data Subject) wishes to contact the government authority responsible for the protection of Personal Data, the Data Subject can contact:

Office of Personal Data Protection Committee

Telephone: 02 141 6985 to 99

Address: 7th Floor, Chalemprakiat Government Complex, B Building,
Chaengwattana Rd., Tungsonghong, Laksi, Bangkok 10210

This Personal Data Protection Policy has been considered and approved by the Board of Directors in Board of Directors Meeting No. 6/2021, held on 10 August 2021. The policy is effective from 10 August 2021 onward.

The logo for TCC Group consists of a red triangle pointing upwards, with a white horizontal line across its top. Below the triangle, the text "BUILDING A BETTER FUTURE" is written in a bold, sans-serif font.

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Attachment 1

List of Policies/Standard Practices in Relation to the Administration and Security of Personal Data

1. IT Security Policy
2. IT Physical Security
3. Information and Network Security
4. User Account Management and Segregation of Duty
5. IT Risk Management
6. Mobile Device and BYOD
7. Information Security Guidelines for Traveling
8. IT Asset Management
9. IT Outsourcing
10. Business Contingency and Disaster Recovery
11. Computer Operation and Maintenance
12. IT Project and Resource Management
13. System Change Management
14. IT Service Management and Security Incident Response
15. Document Control Policy (AWC/DC/AWCCENTER/2019/POL001)
16. Whistleblower Policy (AWC/CS/AWCCENTER/2019/POL004)
17. Risk Management Policy (AWC/CS/AWCCENTER/2019/POL006)


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- 18. Staff Manual
- 19. Integration Procedure Manual: Internal and External Communication
- 20. Data Governance Framework



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