

**Privacy Notice  
for Shareholders, Investors and Interested Investors**

HaadThip PCL., and its Subsidiaries (hereafter called “the company”) are aware of and respect privacy and personal data protection of shareholders, investors as well those interested in the investment (hereafter called “You”). Thus, the company has prepared this personal data protection notice so as to notify details of collection, utilization or disclosure of your personal data (overall called “assessment”) in accordance with the Personal Data Protection Act 2012.

**1. Objectives of Personal Data Assessment**

The company shall evaluate your personal data with the following main objectives.

Objectives of Personal Data Assessment		Assessment Bases
(1)	To manage registration of shareholders, proxy and others for shareholders and debenture holders in order to comply with the law, concerning listed companies, securities and stock exchange or any other related laws.	– Contract Compliance
(2)	To pay dividends to shareholders.	– Legal Compliance – Contract Compliance
(3)	To proceed with applying for the company’s website and applications (s) arranged for shareholders (if any) and usage of the website and application (s) as per the specified conditions.	– Contract Compliance
(4)	To set up a meeting, shareholders meeting and manage such meeting set ups i.e., registration, voting recording etc.	– Requirement for legal benefits.
(5)	To record images, sounds and/or videos during the meeting for benefits of live broadcasting the meeting through the company’s website and other communication channels or to enable the meeting attendees to watch it afterward or public relations for the benefits of the company and the meeting attendees.	– Requirement for legal benefits.
(6)	To sound record the meeting and prepare meeting report that is to be sent to all relevant agencies, for example, the Department of	– Requirement for legal benefits.

Objectives of Personal Data Assessment		Assessment Bases
	Business Development, the Stock Exchange of Thailand, the company's legal consultants and shareholders together with disseminating information on the company's website and other communication channels.	
(7)	To inform information on investor relation activities to shareholders, investors and interested investors as the company deems appropriate.	- Requirement for legal benefits.
(8)	To analyze data in preparation for activities, events and facilities the participated shareholders as the company deems appropriate, for example, preparations for venue, food and beverage, souvenirs or transportation etc.	- Requirement for legal benefits.
(9)	To be a database and other proceedings related benefits as you are a shareholder i.e. subscription right of initial public offering (IPO) etc.	- Requirement for legal benefits.
(10)	To be a database of stakeholders of the company and/or to provide information in order to manage relationship or other cooperations related to the company.	- Requirement for legal benefits.
(11)	To plan, report and anticipate business, manage risks, audit, including internal audit by the internal audit department and internal management as well as benefits for other internal proceedings related to disbursement of the Accounting and Finance Department.	- Requirement for legal benefits.
(12)	To proceed with right transfers and other benefits, for example, amalgamation, separation or transfer of business which are legally executed.	- Requirement for legal benefits.
(13)	Risk management and internal control, audit, including internal audit by the internal audit department, good corporate governance and internal management.	- Requirement for legal benefits.

Objectives of Personal Data Assessment		Assessment Bases
(14)	To establish legal rights, compliance or claims or raise to fight for legal rights as well as other proceedings for legal enforcement.	– Requirement for legal benefits.
(15)	To comply with the law, orders from agencies, independent organizations or authorized officers, for example, to comply with summons, court orders, police officers, prosecutors, Government Agencies and to report or disclose data to the Government Agencies or independent organizations.	- Legal compliance.
(16)	To manage your health and safety.	– Prevention or Restraint of Danger to Life, body and health of an individual.
<p>– In case, the personal data the company has stored for the aforementioned objectives, is the required data in compliance with contracts or various enforced laws. If you do not provide such personal data, the company may not be able to considering entering transactions or manage in accordance with the contract with you (depending on cases).</p>		

## 2. Stored Personal Data

In general, the company shall collect your personal data by means of request or direct inquiries with you. However, in some cases, the company may collect your personal data from other sources, for example, Government Sector or other sources with your personal data clearly shown to the public, including online data disclosure. In such cases, the company may gather your personal data from other sources. Types of your personal data the company is to evaluate are as follows.

2.1 If you are an investor or a shareholder or a securities holder as well as an authorized person or a proxy of the investor or the securities holder or when you make **an inquiry about details, subscription, the investor or the securities holder.** (ภาษาไทยไม่ชัดเจน)

Personal Data	Details of Stored Data
1) Personal Data	First – Last Name, Date of Birth, Marital Status, Mailing Address, Details on National ID Card or Passport, Tax ID Number (if available).
2) Contact details	E-mail address, telephone number, mailing address.

Personal Data	Details of Stored Data
3) Details about Securities	Name of shareholder, number of shares directly hold by you or a broker, Securities Registrar and/or Meet Organizer through electronic system.

2.2 The stored personal data above is necessary data to the company in compliance with contract or your request before the contract signed. If you do not provide such necessary personal data, the company may not be able to proceed with your selection, make transactions or manage contract with you (depending on cases).

### 3. Sensitive Personal Data

3.1 The company may be required to evaluate your personal data that is sensitive in accordance with the Personal Data Protection Act in order to use as per the objectives that the company has notified in this Personal Data Protection Notification or the other objectives that the company has notified you additionally or as per consent you give to the company on an occasional basis. For example,

- 1) When the company is required to use such data for the benefits of security maintenance of the company like biological data, duplicated facial data, fingerprint data in order to use to identify identity.
- 2) The company may store your sensitive personal data even though the activities and services are not directly related to your sensitive personal data. For example, the company is required to use your National ID Card to identify your identity but such National ID Card contains inevitable religious data
- 3) Health information, for example, food allergy information, drug allergy information, congenital disease, medical history in case you can reimburse expenses from the company medical history in case you can reimburse expenses from the company in order to run activities, to proceed with the activities you participate in or for public health benefits, for example, prevention of spread of contagious diseases or epidemics.

3.2 In evaluating your sensitive personal data, the company shall seek your clear consent on a case-by-case basis and shall set up a sufficient security measure in order to protect your sensitive personal data.

### 4. Cookie

In case you have logged in electronic sources of the company, for example, application, website, IT system and cyber, the company makes use of cookies to collect your personal data as specified in the Cookie Usage Notice.

## 5. Consent Withdrawal and Possible Impact from the Withdrawal

5.1 In case the company has evaluated personal data with your consent, you have the right to withdraw the consent given to the company at all times and such withdrawal will not affect the personal data evaluation carried out by the company before you withdraw your consent.

5.2 In withdrawing your consent or refuse to provide some data, it may cause the company to be unable to achieve some or all objectives notified in this Personal Data Protection Notice or other objectives the company has additionally notified you or as per consent given the company occasionally.

## 6. Personal Data of Others

6.1 In case you have provided your personal data to the company, you will be responsible for:

- 1) To notify such individual details as per Personal Data Protection Notice of the company as well as requesting for his or her consent (In case a consent required).
- 2) To proceed as deemed necessary to enable the company to legally evaluate personal data of such individual.

6.2 Personal Data of other persons that the company may use to evaluate, including sensitive personal data, for example, First – Last Name, Date of Birth, Address, Sex, Details on National ID Card or Passport, Nationality, E-mail Address, Tel. No.

## 7. Personal Data of Youth and Incompetent Person

7.1 In case the company is required to have a consent to evaluate personal data of youth, disabled or incompetent person, the company shall evaluate personal data of the aforementioned person when the company has got the consent from a legal guardian with authority to act on behalf of youth, curator or an authorized person to give consent on behalf of such person in accordance with the Personal Data Protection Act (depending on cases).

7.2 In case the company is unaware of whilst the evaluation that the personal data owner is youth, disabled or incompetent person, until afterwards, the company has already evaluated the personal data of such person without consent from the legal guardian with the authority to act on behalf as stated on 7.1, the company shall delete or terminate the personal data or make it unable to

identify identity of the youth, disabled or incompetent person, except in the case that the company can legally evaluate the personal data without any consent.

## **8. Duration of Personal Data Storage**

8.1 The company shall store your personal data for a necessary period in accordance with the objectives of such personal data evaluation, except that the law permits for a longer period of duration. In the case that the company is unable to specify a clear duration of storage, the company shall store your personal data for an anticipated period as per storage measure, taking consideration business practices for each type of personal data.

8.2 In case the company evaluates your personal data with your consent, the company shall evaluate your personal data until you withdraw your consent and the company has completely processed your request. However, the company shall still store your personal data sparingly so as to record that you have withdrawn your consent to allow the company to respond to your future request.

## **9. Disclosure of Your Personal Data**

9.1 The company may disclose your personal data to its subsidiaries, authorized personal data evaluators and/or Data Protection Officers, consultants, financial institutions, financial service providers, internal and external auditors, Rating Agencies, business partners, service providers, contractors, outsources, relating to the company's business operations with regard to the personal data, business alliances, cooperating with the company in Co-branding, individuals, and/or other juristic persons with relations or juristic relations with the company, interested persons to assign rights and responsibilities of the company, persons who wish to merge business with the company in any forms, organizations related to sustainability index, hospitals and/or emergency rescuers (in emergency cases to protect your benefits), Government Sectors, regulatory agencies, authorized persons by law to ask the company to disclose your data and/or as per legal contract between you and the company and/or other persons or juristic persons resided either in Thailand or abroad (including employees, management directors, shareholders, representatives and consultants the company or such recipients of the data). This is to enable the company to operate its business and provide services to you, including operating in accordance with the personal data evaluation objectives of this Personal Data Protection Notice or other objectives additionally notified by the

company or as per your consent given to the company on an occasional basis and/or comply with the law.

9.2 The company shall specify that the recipients of your data arrange appropriate personal data protection measure and evaluate your personal data only required. This also includes operations to prevent persons from accessing or disclosing the personal data without any authorities.

9.3 The company shall demand the recipients of your data to keep your personal data as confidential and not use your personal data for objectives other than the personal data evaluation objectives of this Personal Data Protection Notice or as per your consent given to the company on an occasional basis and/or comply with the law.

## **10. Delivery or Transfer of Personal Data Abroad**

In case the company is required to deliver or transfer your personal data abroad, including keeping your personal data on a data base in the systems abroad, the company shall control the recipients of your data or service providers to maintain the data at its destinations or maintain the data with personal data protection measure and sufficient safety in accordance with the rules of the Protection Data Protection Act of the country the recipients reside (if any). In case, the recipients of your data or service providers maintain the data with sufficient safety in accordance with the rules of the Protection Data Protection Act of the country the recipients reside, the company shall necessarily and appropriately proceed so that the transferred data to such country is protected at the same level as the company protects your personal data.

## **11. Measure of Personal Data Security Maintenance**

11.1 The company shall strictly specify rights of access, usage, alteration or disclosure of personal data, including confirmation of identity of individuals who have access or use the personal data under the Measure of Personal Data Security Maintenance specified by the Personal Data Protection Law.

11.2 The company shall arrange for an appropriate technical means to prevent unauthorized access to the IT system, containing personal data.

11.3 In case the company has disclosed your personal data to other parties, the company shall do whatever necessary to prevent them from wrongly using or disclosing the personal data with no authorities and shall only necessarily use your personal data and in accordance with the objectives the company has notified you and/or has received your consent on an occasional basis.

- 11.4 The company shall arrange for an examination system so as to delete or terminate the personal data from the storage system once the duration of personal data storage is expired or the personal data is no longer related or beyond necessity according to the evaluation objectives or you ask to withdraw your consent.
- 11.5 In case there is a violation of the company's Measure of Personal Data Security Maintenance, causing the violation of your personal data, the company shall promptly report the incident to an authorized department as per the Personal Data Protection Act, except the such violation does not appear to have any risks to affect your right and liberty. In case the violation contains a high risk and affect your right and liberty, the company shall promptly notify you of the violating incident together with a remedy in accordance with the criteria and methods of personal data specified by law.
- 11.6 The company shall record details in writing as per specification of Personal Data Protection Act or in electronic in order to allow the data owners or authorized departments to make an investigation.

## 12. Rights of Data Owner

- 12.1 As the personal data owner, you have the rights to deal with your personal data under the company's responsibilities, according to the Personal Data Protection Act as follows.
- 1) Requests for access right or for copies of personal data or for disclosure of sources of the personal data without your consent.
  - 2) Receivable personal data in electronic mean or transferrable data to others.
  - 3) Objection of collection, usage or disclosure of your personal data under the rules specified by the Personal Data Protection Act.
  - 4) Request to delete or terminate your personal data or disable your data to identify your identity under the rules specified by the Personal Data Protection Act.
  - 5) Request to withhold usage of your data under the rules specified by the Personal Data Protection Act.
  - 6) Request to rectify, update and complete your personal data without causing any misunderstandings.
  - 7) Withdrawal consent given to the company unless there is a limitation of the right to withdraw by law or juristic contract that is beneficial to you.
  - 8) You can make a complaint to the authorized agency that the management of your personal data is not in accordance with the Personal Data Protection Act.
- 12.2 You can exercise your rights under 12.1 by contacting the specified under 14.

12.3 The company reserves the right to turn down your request to exercise your right either wholly or partly when the company has an appropriate reason and in accordance with the law, for example, such proceeding may cause an unnecessary responsibility, is beyond practice and in contradictory with the law. Your right exercise has or may have an effect on right and liberty of others or in case the company has a legal authority to collect your personal data without having to seek your consent.

### **13. Notice or Personal Data Protection Policy of other websites or application**

In case you use the company's website or application and press other links on such website or application in order to access other websites or applications whether or not such websites or applications belong to the company. You will need to study and comply with this Notice or Personal Data Protection Policy of other websites or applications and the company shall not be responsible for content or measure of the Personal Data Protection of the website or the application. If you have given your personal data to owners of other websites or applications, you acknowledge and well understand that the company has no relation with the owners of other websites or applications with regard to your personal data evaluation.

### **14. Change and Rectification of this Privacy Notice**

The company may consider improving, rectifying or changing this notice as deemed appropriate and shall notify you through the company's website with the latest updated date shown at the end. However, the company would like to advise you to regularly check in order to acknowledge a new notification, especially before you disclose data to any persons.

### **15. Contact Channels**

The company has appointed a Data Protection Officer to provide an assistance in managing your personal data. If you have inquiries or recommendations about the company's practice of personal data management or wish to exercise your rights as the data owner, you can contact the company through "Data Protection Officer"

- Tel. : 074 210008 ext. 1188
- E-mail : [dpo@haadthip.com](mailto:dpo@haadthip.com)
- Mailing address: No. 87/1 Karnjanavanich Rd., T.Banpru Hatyai, Songkhla 90250 Thailand
- Online at [www.haadthip.com](http://www.haadthip.com) (contact us)