

## TCM Corporation Public Company Limited Personal Data Protection Policy

TCM Corporation Public Company Limited (the "Company") as a personal data controller under the Personal Data Protection Act B.E. 2562 ("Personal Data Protection Act") recognizes the importance of personal data protection. Therefore, the Personal Data Protection Policy ("Policy") has been established for the purpose of the Company's operations to be in compliance with laws and international standards. It also specifies criteria to protect the data subjects of personal data, as well as several measures to manage the infringement of data subjects' right of personal data with efficiency and appropriateness. This policy describes the means for the Company to treat personal data such as collection, storage, usage, disclosure, and the right of data subjects, etc.

To inform the data subjects of personal data regarding the Company's policy of personal data protection, the Company therefore provides the notification as follows:

### 1. Scope of use

The scope of this policy covers the processing of all personal data operated by the Company, including any subjects who perceive those personal data in connection to the Company's operations, and shall comply with this policy and within the framework issued by law.

For the personal data which were collected prior to the enforcement of Personal Data Protection Act, the Company will continue to collect and utilize such personal data according to their original purposes. Disclosing and processing any collections and utilizations other than the above mentioned shall be in compliance with the Personal Data Protection Act.

### 2. Definition

"Personal data"	means information about an individual which can be identified directly or indirectly, but not including data of the deceased in particular.
"Sensitive data"	means personal data about race, ethnicity, political opinions, religion beliefs or philosophy, sexual orientation, criminal records, health information, disability, Labor Union's information, genetic data, biological data, or any other information, which affect the data subjects of personal data in a similar manner as specified in the notification of Personal Data Protection Committee.
"Processing"	means the collection, utilization, and disclosure of personal data.
"Data subject"	means an individual who owns personal data.

### 3. Purpose of collection and utilization of personal data

The Company will collect or use personal data of the data subjects for the benefit of the Company's operations, such as registration of shareholders and directors, meetings, procurement, contracts, financial transactions, activities, coordination, or quality improvement to be more efficient, including the preparation of a database for analysis and development for the Company's operations and any other purposes which are not prohibited by laws and/or in compliance with any laws or regulations relevant to the Company's

operations. The Company will collect and utilize such personal data only for the necessary period as notified in the purposes for the data subjects of personal data or required by laws.

The Company will not do any differences from what specified in the purposes of personal data collection, except:

- (1) The Company notifies new purposes to the data subjects of personal data with approval.
- (2) It is in compliance with the Personal Data Act or other relevant laws.

#### **4. Collection of personal data**

The Company will collect personal data for the purpose and scope with lawful and fair methods. The collection will be done only to the extent of necessity for the operations under the Company's objectives. In this regard, the Company will inform the data subjects of personal data to give their consents electronically or any methods by the Company. In case of the sensitive personal data of the subjects, the Company will request for their consent with clear understanding prior to such personal data collection, unless the collection of (sensitive) personal data is in accordance with the Personal Data Protection Act or other relevant laws which specify that it can be done without the consent of the data subjects. The sources of personal data collection can be from 2 channels as follows:

- 4.1 The personal data are directly collected from the data subjects, such as personal data collection through the filling of both paper and online application forms, health data, the Company's surveys or website systems.
- 4.2 The personal data are not directly collected from the data subjects of personal data, but other sources such as searching through website systems or inquiries from third parties. Whereas, the Company will notify the data subjects personal data without delay, including proceed with a request for consent for personal data collection from the data subjects, unless it is exempted for having consent or notification to data subjects of such personal data as required by laws.

#### **5. Disclosure of personal data**

The Company will not disclose personal data of the data subjects to any persons without their consent. The personal data will be only disclosed according to the purposes for which it has been specified. The Company may need to disclose personal data of the data subjects to its subsidiaries or other people both domestically and internationally, such as service providers who perform tasks related to personal data. To disclose such personal data to those individuals, the Company will ensure that they shall keep all personal data with confidentiality and shall not also use them for any purposes other than the scope specified by the Company.

In addition, the Company may disclose personal data of the data subjects under the regulations issued by laws, such as disclosing data to government agencies / units and regulators. This includes a request to disclose data by the virtue of law, namely data for litigation or legal actions of private agencies or other third parties involved in legal proceedings.

#### **6. Principles of personal data protection**

The Company puts great importance to the security measures of personal data that are appropriate in accordance with international standards, as well as laws, regulations, rules, and practices on personal data protection. This also comprises several measures to protect the right, liberties, and benefits of the personal

data subjects, with technological application to protect data loss, access, utilization, alteration, correction, or disclosure of personal data without authorization or against the laws. This is in line with the Company's data security policies and practices, including the provision of supports and encouragements to employees to be knowledgeable and aware of their duties and responsibilities for collection, storage, utilization, and disclosure of the data subject's personal data.

In the event that the Company has hired agencies or third parties to carry out the collection, utilization, or disclosure of the data subjects' personal, the Company will designate such entities or third parties to Keep those personal data with confidentiality and maintain the security of such personal data, including the protection of personal data from being collected, used, or disclosed for any other purposes that are not in accordance with the scope of employment or contrary to the laws.

## **7. Duration of personal data retention**

The Company will retain personal information for the following periods:

- 7.1 According to the period specified by laws regarding the retention of personal data, such as the Accounting Act B.E. 2543, the Anti-Money Laundering Act B.E. 2542, the Computer-Related Offenses Act B.E. 2007, and the Revenue Code
- 7.2 In the event that the laws do not specify any specific periods of retention of personal data, the Company will determine the retention period as necessary for proper operations of the Company.

After the expiration of the said retention period, the Company will delete, destroy, or make such personal data as non-identifiable data about the data subjects of personal data.

## **8. The right of the data subjects of personal data**

This policy is designed to assure that the data subjects of personal data can exercise the following right in accordance with the Personal Data Protection Act.

- 8.1 The right to withdraw consent to the processing of personal data for which consent has been given. However, the withdrawal of consent does not affect the collection, utilization, or disclosure of personal data for which consent has been given.
- 8.2 The right to access personal data and request a copy of personal data, including disclosure of personal data acquisition without consent
- 8.3 The right to modify personal data
- 8.4 The right to delete personal data
- 8.5 The right to suspend the utilization of personal data
- 8.6 The right to transfer personal data
- 8.7 The right to object the processing of personal data

The data subjects can request to exercise the above right by submitting a request to exercise the right to the Company in writing or via electronic mail according to the forms provided by the Company through the "Corporate Contacts" as specified below. The Company will consider and notify the result of the consideration for the request of the data subjects within 30 days from the date of receipt of the said request. The Company may refuse to process the request if there is a cause as specified by laws.

#### 9. Review and change of personal data protection policy

The Company may update or amend this policy from time to time to comply with legal requirements, changes in the Company's operations, Including suggestions and opinions from various departments. The Company will clearly notify the changes before starting to make changes.

#### 10. Contact channel

*TCM Corporation Public Company Limited*

Contact address: 2054 New Petchburi Road, Bang Kapi Subdistrict, Huai Khwang District, Bangkok 10310

Tel.: 0 2318 3960

Email: [info@tcm-corporation.com](mailto:info@tcm-corporation.com)

Website: [www.tcm-corporation.com](http://www.tcm-corporation.com)

*Data Protection Officer: DPO*

Contact Address: Administrative Office Department

2054 New Petchburi Road, Bang Kapi Subdistrict, Huai Khwang District, Bangkok 10310

Email: [comsec@tcm-corporation.com](mailto:comsec@tcm-corporation.com)

According to the resolution of the Board of Directors Meeting on 4 February 2022.

TCM Corporation Public Company Limited

Ms. Piyaporn Phanachet  
Chief Executive Officer