



Policy: Personal Data Protection

Document No.: PB-COM-035

Effective Date: August 11, 2023

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In accordance with the resolutions of the 4th meeting of Board of Directors of Hinsitsu (Thailand) Public Company Limited (the "Company"), the Personal Data Protection Policy has been issued to consider as a principle and practice as follows:

1. Preface

Hinsitsu (Thailand) Public Company Limited (the "Company") and its subsidiaries, hereinafter collectively referred to as The Company Group, respect and give importance on the privacy rights and protection of personal data of the personal data owners, which are basic rights in privacy of person. The personal data owners wish to provide his or her data to be kept secure. In conjunction with the Law on the Protection of Personal Data, guidelines or measures governing the protection of personal data relating to the collection of personal data have been established. Therefore, this policy has been established as a principle for the protection of personal data owners. In order to provide details and procedures for the protection and management of personal data of third parties or its counterparts, this Personal Data Protection Policy may be updated or amended, in part or in whole, from time to time in accordance with the Group's operating practices and the legal guidelines that may change.

2. Related Definitions

The Company means Hinsitsu (Thailand) Public Company Limited (the "Company").

Subsidiaries means Hinsitsu Precision (Thailand) Co., Ltd. and Simat Label Co., Ltd.

The Company Group means Hinsitsu (Thailand) Public Company Limited - the parent company, and subsidiaries comprise of 1) Simat Label Co., Ltd. and 2) Hinsitsu Precision (Thailand) Co., Ltd.

The Laws concerning Personal Data Protection means the Personal Data Protection Act B.E. 2562 (including the amendment), covering applicable rules, regulations notifications and/or orders concerned.

Personal Data means data about a natural person which makes it possible to identify that person directly or indirectly, but does not include data about a particular deceased person.

The Parties means customers, partners, suppliers, employees or any other persons contracted with the Group of Companies who are partner or work with the Company and/or its subsidiaries.

Personal Data Protection Officer means an officer appointed by the Personal Data Controller to act as a Personal Data Protection Officer under the Personal Data Protection Act B.E. 2562 (2019).

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Third Parties means third parties of The Company Group who is a natural person and has direct or indirect relationships with the Group, including the use of the Group's website or products or other services by third parties for the Group, including officials of the relevant government or private agencies, advisors of the Group, visitors to the Group's website contact, or other related third parties, etc.

Personal Data Controller means The Company Group, which has the power to make decisions regarding the collection, use or disclosure of such personal data, in which the Group obtains personal data from third parties or parties, or must make or fulfill contracts with such persons.

Personal Data Processor means a person or juristic person who acts in connection with the collection, use or disclosure of personal data in accordance with the orders or on behalf of the Controller of Personal Data.

Website means a website owned or provided by The Company Group, as the case may be.

3. Collection of Personal Data

The Group collects personal data for use in the operations of The Company Group. and the Group collects personal data with the lawful purposes, scope, method. In this regard, collecting such personal data shall be done limitedly and only as necessary for which it is collected, use and/or disclose personal data and in accordance with the provisions of the Personal Data Protection Act by collecting personal data in the following ways:

Types of Personal Data which the Group of Companies keeps.

3.1 Personal data collected and processed under this Policy whether it is personal data provided directly to the Group, or personal data received by the Group from third parties, or the Group of Companies obtained from other sources. The categories of personal data can be categorized as follows:

3.1.1 General personal data collected by the Group, such as:

- Personal data such as first name, last name, date/month/year of birth, age, gender, photo, signature, workplace, job title, education background, work experience, training history, performance data, data based on copies of documents issued by government agencies, such as copies of ID cards, copies of passports. copy of house registration, etc.
- Contact data, such as address, telephone number, email address, contact person and other data that the Group can contact, etc.
- Financial data, such as bank book copy, tax ID number.

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- Data used as evidence or in transactions such as personal data appearing in copies of ID cards, copy of passport, copy of last name change certificate, copy of house registration, copy of driver's license, copy of car registration manual, car registration number, copy of title deed, copy of power of attorney, copy of company certificate, invoice, receipt, payment voucher and copy of professional or business license, etc.
- Technological data, such as computer traffic data (Log), computer identification number (IP Address), geographical location data using location technology, the type of computer program used to view web sites. (Browser), web site access log data, website data accessed by users before and after (Referring Website), website usage history log data, login log data, transaction log data, website visit statistics, time of visit to the website (Access Time), data that is searched or visited, data on the use of social media, the use of functions on the website, and data collected by the Group through cookies or other similar technologies, etc.
- Record of still images and movies through CCTV, voice recordings, conversations, or other personally identifiable data.


3.1.2 Sensitive Data, which means personal data that is inherently private to the data owner, in accordance with Section 26 of the Personal Data Protection Act B.E. 2562 (2019), such as biometrics, finger print data, face scans / face recognition, religious or blood group data as shown in a copy of id card (if any), criminal history data, including alleged offenses or prosecutions, health data or race data, etc. The Group does not obtain a policy to store such sensitive personal data, except in the case of the Group obtains the express consent of the owner of the personal data or any other case as required by law.

3.2 In case of transaction or contracting, if the personal data owner does not provide personal data or provides inaccurate or current personal data to the Group the Group shall not provide the Personal Data that may affect the owner of personal data may not be able to transact with the Group, or may not be comfortable or uncomfortable or not fulfilled with existing contracts with the Group. And it may damage or lose opportunities for personal data owners as well as may affect compliance with any laws, which the personal data owner or group of companies must comply.

3.3 Sources of Personal Data

Sources of personal data, which the Group collects and receives, are as follows:

The Group receives personal data directly from the personal data owner, such as when the personal data owner fills out forms through the Group's website or other channels provided by the Group, prepare it when the personal data owner enters into a contract with the Group of Companies, when the personal data owner delivers documents and copies of documents containing personal data to the Group, or when the owner of the personal data asks for data, comments or feedback, or submits a complaint to the Group by phone, e-mail, fax, by mail, data on the use of the Group's websites or applications, use of cookies, IP addresses, etc.

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The Group receives personal data from third parties or from other sources such as government agencies, department of business development websites, revenue department websites, other websites, etc.

4. Purposes for Personal Data is Collected, Used and/or Disclosed

Group of Companies will collect personal data of the personal data owner as necessary for the group's operations only. The Group may have different purposes for processing personal data as the case may be as follows:

4.1 The Group collects, uses or discloses personal data for the following purposes:

- For the purpose of establishing and managing contracts between the Group and any of its counterparties, including the group's operations in accordance with the contract.
- For the purpose of purchasing or registering a new party or any other person of similar nature, as well as to process any requests for the parties or any other person of similar characteristics.
- To record the Group's creditor setup, invoicing, issuance of tax invoices, the Group's credit bureaus, disbursements, as well as financial transactions and accounting operations of the Group.
- For internal audit or audit of the Group of Companies in accordance with the standards of operation and in accordance with the relevant requirements or laws.
- For the purpose of complying with laws relating to the Group's operations and lawful orders of government agencies and related officials, such as business registration to the Department of Business Development, notification of registration of personnel or persons involved in the law, preparation of tax reports filed with the Revenue Department, accounting audits by auditors, etc.
- For the purpose of confirming or identifying the identity of the personal data owner in case of access to various services, contracting, doing duty according to contract in order to ensure that such services including all communications of the Group are secure and confidential.
- For the purpose of communicating or coordinating the group's operations or missions with individuals or its parties.
- For the purpose of promoting information, news, activities of the Group such as training, meetings, seminars, group projects, relationship contribution activities, CSR activities, etc.
- To create a database of activity participants, project participants, meeting participants, training or seminar participants of the Group, including data analysis and surveys of such persons' behavior.
- For management purposes of health, occupational health and safety of employee, annual health check-up including general health check-up and occupational health check-up (health check-ups based on risk factors), health insurance and health readiness assessments, as well as data for reporting, investigation,

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cause analysis or development of preventive health management (Preventive Health) and set measures to prevent any incidences occurring.

- To protect health from dangerous infective diseases that may spread within the Group by screening individuals entering and exiting the premises, as well as monitoring and arranging travel reports that may cause a risk of disease spreading.
- For inspection and security within the Group's buildings or premises and safety risk assessments, including entry and exit for operations on the Group's premises, redemption of the card to and from buildings or premises of the Group, recording of access to and from the Group's premises, and recordings of inside buildings or groups of companies or the surrounding area with CCTV.
- For the establishment of legal claims, compliance or exercise of legal claims or raising legal claims, prosecutions, as well as legal enforcement actions, such as investigations and/or hearings by government officials, preparing a case prosecution and/or court martial, etc.
- For the management of data among the Group and security surveillance in the Group's systems.

4.2 The Group shall not collect, use and/or disclose personal data of the Personal Data Owner other than for the purposes of which the Group will not collect, use and/or disclose personal data of the Personal Data Owners other than the purposes of the Group notified, except:

- This is the case when collecting, using and/or disclosing personal data for new purposes whereas the Group has informed the owner about the new objectives and the Group has obtained the consent of the personal data owner.
- It is the case that the law requires and the Group of Companies can proceed.

5. Disclosure of Personal Data

5.1 The Group will disclose the personal data of the personal data owner under the measures specified by law and for the purposes notified to the person or entity as follows:

1. Service providers and personal data processors, which the Group assigns or hires to manage/process personal data for the Group of Companies to provide services such as human resources management, security services, data technology services, accounting audits, or any other services related to the Group's operations, or services that may benefit the personal data owner.
2. Advisors of the Group, legal Advisors Lawyers, auditors, external auditors, speakers or other experts inside and outside the Group, etc.
3. Government agencies, regulators, independent bodies or other entities as legal authority, including officers or agencies that are responsible for or exercising their legal authority, such as the Group of Companies, the Bureau of Government Development, the Budget Office, the Ministry of Higher Education, Science,

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Research and Innovation, court, police, Department of Labor Protection and Welfare, Department of Skill Development, Office of Social Development and Human Security, Department of Promotion and Development of Quality of Life for People with Disabilities, Revenue Department, Social Security Office, Department of Transportation, Department of Business Development, Department of Industrial Works, Industrial Estate Authority of Thailand, Immigration Office, Personal Data Protection Commission Office, National Police Office, Office of Attorney General, courts and Legal Execution Department, etc.

4. Customers, partners, suppliers, employees, contractors of the Group of Companies whose personal data owners are contacted, communicated or related to the duties or positions of the personal data owner, or any other person of similar nature.
5. Banks, financial institutions, Bank of Thailand.
6. Insurance or hospital, for any operations of the Group.
7. Any person or entity, who the personal data owner consents to disclose the personal data of the personal data owner to that person or entity.

5.2 The Group may send or transfer personal data of the personal data owner to abroad. If this is the case, the Group must obtain the consent of the personal data owner for the transmission or transfer of personal data of the personal data owner to a foreign country. The Group will first seek the consent of the personal data owner, and the Group will investigate the destination country, international organizations or overseas data recipients have adequate personal data protection standards and comply with the guidelines set by the Personal Data Protection Act.


6. Retention Period

The Group will store personal data of the Personal Data Owner for as long as necessary for the purposes notified to the personal data owner, or for the purposes set forth in this Policy. In the event that the personal data owner terminates the relationship, or ends the contract with the Group of Companies, or does not use the services or Transactions of the Group. The Group will store personal data of the personal data owner for a specified period of time thereafter, or for the period specified by law, or at the prescription or for the limitation of legal claims. However, at the end of the storage period of such personal data, the Group will delete or destroy personal data or make personal data that cannot identify the person who owns the data.

7. Rights of Personal Data Owners

7.1 In the event that the owner of personal data wishes to know or obtain a copy of personal data relating to own self which is the responsibility of the Group of Companies, or asks the Group to disclose the acquisition of data that the personal data owner does not give consent, the personal data owner can submit a request in accordance with the rules and procedures of the Group defined.

7.2 In the event that the personal data owner deems that any personal data concerning own self is inaccurate, not update, incomplete, or potentially misleading; the personal data owner can ask the Group of Companies to take corrective steps to make the data accurate, update, complete and does not cause misunderstanding by submitting a request to the Group of Companies in accordance with the rules and procedures of the Group defined. In case the Group of Companies fails to comply with the request of the personal data owner,

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The Group will provide a record of such request of the personal data owner and reasons as evidence so that the personal data owner can verify it.

7.3 The personal data owner has the right to revoke the consent given to the Group to collect, use and/or disclose their personal data at any time, unless the withdrawal of consent is limited by laws or contracts that benefit the personal data owner, such as the owner of personal data also has a contract with the Group of Companies, or the owner of personal data also has debt obligations or legal obligations to the Group. So that revoking such consent may prevent the personal data owner from receiving services or transacting with the Group, or may cause the services to be provided by the Group not as effective as it should be.

7.4 The personal data owner has the right to obtain personal data relating to own self from the Group of Companies. In case the Group makes personal data in a format that can be read or generally used by tools or devices that work automatically and can be used or disclosed by automated methods. As well as the personal data owner has the right to ask the Group to send or transfer such data in such form to another data controller when able to do so by automating, or obtaining data which the Group of Companies send or transfer such data to other data controllers directly, unless technical conditions are not able to do so.

7.5 The personal data owner has the right to protest against the collection, use or disclosure of personal data relating to own self at any time in the following cases:

1. In the event that the data collected is necessary for the conduct of the mission in the public interest of the Group or the reason necessary for the legitimate interests of the Group, except for the Group of Companies demonstrates more important legitimate grounds or establish legal claims. legal compliance or exercise of legal claims, or raising legal claims.
2. In the event that the collection, use or disclosure of personal data for direct marketing purposes.
3. In the event that the collection, use or disclosure of personal data for the purposes of scientific, historical or statistical research, unless necessary for the conduct of the Group's public interest missions.

7.6 The personal data owner has the right to request the Group to delete or destroy or make personal data that cannot identify the person who owns personal data in the following cases:

1. When personal data is deprived of the need to be retained according to the purposes for which it is collected, used or disclosed.
2. When the personal data owner withdraws the own consent to collect, use or disclose personal data. And the Group of Companies has no legal authority to continue collecting, using or disclosing that personal data.
3. When the personal data owner protest against the collection, use or disclosure of personal data in accordance with Article 7.5 (1) and the Group of Companies cannot deny such protest request. Or it is the case to collect, use or disclose personal data for direct marketing purposes.
4. When personal data is collected, used or disclosed unlawfully.

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7.7 The personal data owner has the right to request that the Group to suspend the use of personal data in the following cases:

1. When the Group of Companies is under investigation as requested by the personal data owner to process the personal data of the personal data owner to be correct, update, or not misleading.
2. When it is personal data that must be deleted or destroyed because it is collected, used or disclosed unlawfully, but the personal data owner asks to suspend its use instead.
3. When personal data is deprived of the need to be retained according to the purposes for which it is collected, but it is necessary for the personal data owner to request it be retained for the establishment of legal rights, legal compliance or exercise of legal claims, or raising legal claims.
4. When the Group is in the process of proving more legitimate grounds, or establishing a legal claim. Legal compliance or exercise of legal claims, or raising legal claims in the event that the personal data owner exercises the right to protest against the collection, use or disclosure of the data.

7.8 The personal data owner has the right to complain to the Board of Experts in accordance with the Law on the Protection of Personal Data in the event that the Group or the person processing personal data including employees or contractors of the Group or the person processing of personal data, violates or fails to comply with the laws governing the protection of personal data or notifications issued in accordance with such laws, to:

Office of the Personal Data Protection Commission

7th Floor, Ratthaprasadsana Bhakdi Building, 80th Anniversary Government Complex,

Chaengwattana Road, Thungsonghong, Laksi, Bangkok 10210

However, the Group of Companies reserves the right to consider requests for such rights and to comply with the personal data protection laws.

8. Security Measures for the Retention of Personal Data

The Group gives importance to the security of personal data of the personal data owner strictly. Therefore, the Group of Companies obtains security measures in place, including the collection, use or disclosure of secure and appropriate personal data in order to prevent the loss of personal data of the personal data owner, being used in illegitimate way, accessed, changed or disclosed without permission. So that the Group will limit the access to personal data of the personal data owner only the persons granted permission to access the data. In doing this, such persons will process personal data of the personal data owner under the conditions defined by the Group only.

The Group will provide personal data security measures covering management preventive measures, technical preventive measures, and physical preventive measures regarding access to or control of the use of personal data including at least the followings:

1. Access control of personal data and devices for the storage and processing of personal data by considering the use and security in mind.

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2. Defining or assigning access to personal data.
3. Managing the user' s access in order to control the access to personal data only for authorized persons.
4. Determination of user duties and responsibilities to prevent unauthorized access to personal data, disclosure, or theft of copies of personal data, or theft of storage devices or personal data; and
5. Providing a method to allow retrospective checks on access change, delete, or transfer personal data in accordance with the methods and media used to process personal data.

In addition, the Group of Companies will retain personal data for the purposes notified to the personal data owner and in accordance with the law. And in the event that the Group will hire a group of third parties to process personal data of the personal data owner, the Group of Companies will select a group of companies with a standardized data protection system and make agreements relating to the retention of personal data in accordance with the same policy.

In the event of a breach of personal data of the personal data owner, the Group of Companies will notify the Office of Personal Data Protection Commission without delay within 72 hours from the time of the incident as soon as possible, unless such violation does not pose a risk to affect the rights and freedoms of the personal data owner. In the event of a violation obtaining a high risk affects the rights and freedoms of the personal data owner, the Group of Companies will notify the owner about the breach to the personal data owner along with the remedy without delay.

Cookies means small data submitted by a website to the owner of personal data that visits the website to help the website remember the personal data of the personal data owner, such as the language selected first, system user, or other settings when the personal data owner visits the website next time. The website recognizes that it is a user who has already accessed the service and sets it as required by the personal data owner until the personal data owner deletes the cookies or not allow cookies to no longer work. The personal data owner can accept or do not accept cookies. In the event to choose to not accept or delete cookies, the website may not be able to provide services or cannot be displayed correctly.

9. Link to Third-party Website

The Group's website may contain links to third-party websites where those third parties may collect certain personal data about the use of the personal data owner's services; whereas the Group of Companies cannot be responsible for the security or privacy of any data of the personal data owner collected by such third-party websites. Personal data owners should exercise caution and review the personal data protection policies of the website, products and services of those third parties as well. The Group may update or amend the Personal Data Protection Policy without prior notice to the personal data owner in order to be appropriate and effective in providing services.

10. Policy Review

This Policy applies to all personal data which the Group collect, use and disclose. And the personal data owner agrees to the Group has the right to collect and use personal data of the personal data owner, which the Group of

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Companies had collected already (if any) as well as personal data of the personal data owner which the Group collects at the present and will collect in the future, to be used or disclosed to other persons within the limits specified in this Policy.

The Group will review this policy at least once a year and will implement the revised policy as necessary or as appropriate.

11. Governing Law and Jurisdiction

This policy is governed by and construed in accordance with Thai law and gives the Thai courts the authority to consider any disputes that may arise.

12. Contact Channels

If the personal data owner wishes to contact, or has questions, or wants to inquire about the details of the collection, use and/or disclosure of personal data including the rights of the personal data owner in this policy; or wishes to cancel consent to the collection, use and/or disclosure of personal data; or in case it is found that personal data of the personal data be used in illegitimate way. The personal data owner can contact the Group of Companies through the following channels:

Personal Data Protection Officer “DPO”

Ms. Rujira Sukheewat

E-mail address: rujira@th.hinsitsu.com Tel. 02 759 4344 Ext. 140

Contact Address: No. 883 Moo 1, Bangsaothong Sub-district, Bangsaothong District, Samutprakarn 10570

13. Personal Data Owner Exercise Petition Right Form

The personal data owner can requests to cancel consent to the storage of personal data under the Personal Data Protection Act B.E. 2562 (2019) by downloading the form and sending it to E-mail: rujira@th.hinsitsu.com

Download the form


Announced on August 11, 2023

Hinsitsu (Thailand) Public Company Limited

-Signature-

(Mr. Weidt Nuchjalearn)

Chairman of the Board of Directors

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