



Personal Data Protection Policy ("Policy")

Osotspa Public Company Limited and subsidiaries

(approved by the meeting of the Board of Directors No. 5/2020 held on 23 April 2020)

This Policy shall be effective from 27 May 2020 onwards

(Mr. Surin Osathanugrah)

Chairman

(Mr. Petch Osathanugrah)

**Chairman of the Executive
Committee and CEO**



เรื่อง (Subject) :

หน่วย/งาน (Unit /Division) :

Legal

แก้ไขครั้งที่ (Revision No.) :

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วันที่เริ่มใช้ (Effective Date) :

27 MAY 2020

Personal Data Protection Policy

Osotspa Public Company Limited (“Osotspa”) and its Subsidiaries (Osotspa and its subsidiaries collectively called the “Company”) realise the importance of the protection of Personal Data held by the Company and of our customers which is material to our operations and demonstrates the Company’s integrity. We are committed to the sustainable business operations on the basis of accountability to the management of Personal Data and privacy in respect of related parties and in compliance with relevant laws, rules and regulations, so as to uphold the security and privacy in respect of the Personal Data of our individual customers on all distribution channels, directors and employees of our vendors which are juristic person and individuals, our Personnel, our visitors as well as participants in our sale promotion and corporate social responsibility activities. We have prepared and declared this Policy in accordance with our corporate governance principles.

Definition

Personal Data means data related to a data subject which can identify such person whether directly or indirectly, excluding data of deceased persons.

Data Subject means a natural person whose Personal Data includes, but not limited to individual customers of the Company on all distribution channels, directors and employees of our vendors which are juristic person and individuals, our Personnel, visitors as well as participants in our sale promotion and corporate social responsibility activities.

Subsidiary means a company of any of the following natures:

- (a) a company in which Osotspa have the Control;
- (b) a company under the Control of the company under (a);
- (c) any company under the Control of the company under (b) in all downward levels starting from those under the Control of the company under (b).

Processing means any operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination, including erasure or destruction or otherwise making available, alignment or combination.

Personnel means the Board of Directors, executive officers, permanent employees, temporary employees or contract employees of the Company.

Control means any of the following relationships:

- (a) holding of shares with voting rights of a company in an amount exceeding fifty percent of the total number of the voting rights of such company;
- (b) having the power to control the majority voting rights in the shareholders’ meeting of a company whether directly or indirectly or by any other reasons;
- (c) having the power to control, directly or indirectly, the appointment or removal of a least one-half of all directors.

Personal Data

This Personal Data Protection Policy applies to all channels of data collection and data formats, the Company’s purposes of the use and disclosure to third parties of Personal Data, including the procedures employed by the Company to protect the Personal Data of customers. The scope of this Policy is applicable to the Company and its entry into any contracts or agreements related to the Personal Data with its vendors.



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Policy on Personal Data Protection

The key Personal Data Protection policy of the Company includes:

1. To ensure that the Processing of Personal Data by the Company complies with the Privacy Policy of the Company to be issued and the relevant laws including the Personal Data Protection Act B.E. 2562 (2019);
2. To inform a Data Subject of any of his/her Personal Data having been under the Processing by the Company, the purpose of such Processing, the case where the Data Subject is required to provide his/her Personal Data and any potential impacts from not providing such Personal Data, duration for the retention of Personal Data, type of persons or agencies which may receive such Personal Data, information related to the Company as the data controller, the legal rights of the Data Subject, cross-border transfer of such Personal Data, as well as the rationale and method of the Processing of such Personal Data;
3. To perform the Processing of Personal Data to the extent necessary and subject to the legitimate purpose only, which may include the purpose of performance as required by the law, the performance of a contract, the legitimate interests of the Company, or otherwise to the extent permitted by the law;
4. To establish the technical measure and organisational measure in respect of the Processing of Personal Data by the Company and to establish the measure related to the security of Personal Data, in which the department in charge of determining the measure to safeguard the security of Personal Data, overseeing and monitoring the compliance of such measure by relevant business units of the Company, advising the Personnel on the compliance with the law governing personal data protection and coordinating and cooperating with the competent officials;
5. To establish the technical measure in respect of the IT system used in the Processing of Personal Data to ensure that the equipment for Processing the Personal Data operates correctly and accurately and is functioning on basis of maintaining the security at all time, as well as to establish the detection system to erase or destroy Personal Data upon expiry of the storage duration or as required by law;
6. To manage the Company's human resource by setting up the measure to administrate the training to understand and operate the work systems related to Personal Data and the Processing of such Personal Data including the practices related to the Processing of such Personal Data and the security of Personal Data, so as to ensure that the Personnel perform their duties with understanding and accountability in respect of the use of Personal Data of Data Subject and to encourage development of personnel in charge of IT system to acquire the expertise and skill to manage recent cyber-attacks;
7. In respect of the Company's engagement of vendor for the Processing of Personal Data under instruction or on behalf of the Company, to establish the measure to ensure that the vendor executes a confidentiality agreement and/or agreement to oversee its performance to comply with the duty of a data processor, and to determine the clear scope of responsibilities of the vendor to be strictly adhered to;



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8. To establish the measure and practice related to the handling of the Data Subject's request to allow the Data Subject to exercise the rights as stipulated by the Personal Data Protection Act, B.E. 2562 (2019), such as the right to access or the right to erasure;
9. To establish the measure for a prompt, effective and consistent notification to the responsible agencies and competent officials of the events affecting the security of the Personal Data, such as, Personal Data breach due to computer virus, phishing or cyber-attack, as stipulated by the law governing the protection of Personal Data;
10. To prepare a record of Processing of Personal Data to ensure close monitoring of compliance with the law governing the protection of Personal Data;
11. To establish the policy and guideline in respect of the transfer or transmission of personal data to the data controller or data processor in overseas to be in accordance with the notification of the Personal Data Protection Commission.
12. To regularly assess and monitor the compliance of the Privacy Policy of the Company to be issued and the relevant laws in relation to the protection of Personal Data, so as to ensure that the status and security of Personal Data are appropriately maintained, and to assess and mitigate any risk of events which may affect the security of the Personal Data.

The Company shall fully comply with the Personal Data Protection Act B.E. 2562 including other related laws in all aspects.

Signed.....
(Mr. Surin Osathanugrah)

Chairman of the Board of Directors