

External Personal Data Protection Policy CH. Karnchang Public Company Limited

External Personal Data Protection Policy

Ch. Karnchang Public Company Limited

1. Objectives

Ch. Karnchang Public Company Limited ("**Company**") realizes the importance of your privacy and sees the necessity of appropriate personal data management (according to the definitions below) in accordance with the law. The Company has therefore enforced this External Personal Data Protection Policy ("**Policy**") to protect your rights concerning the processing (according to the definitions below) and Personal Data management of the Company. The Company will use all reasonable and necessary measures to protect Personal Data in line with the Personal Data Protection Act 2019 (B.E. 2562) including other governing law and regulations (collectively "**Law**"), as well as maintain appropriate information protection measures.

In order to achieve the objectives of this Policy, the Company will act as the controller of Personal Data and/or the data processor, as defined by law, to process your personal data. The details are as follows:

2. Scope

- **2.1** This Policy will come into force on June 1, 2022. The Company will review the enforcement of this Policy from time to time and subject to changes or amendments which will be notified to you by the Company.
- 2.2 This Policy applies to the processing of personal data by the Company either as the data controller itself or to the processing as a processor for our affiliates in the Kingdom of Thailand. If any illegal acts are found or considered to be a violation of this policy, the Company will take action strictly and to the maximum, including imposing appropriate penalties. The Company is not obliged to notify the processing in the event that the Company acts as a processor on behalf of its affiliates. The Company, therefore, would like to inform you of the processing in these cases in this policy document.
- **2.3** Unless otherwise specified, this Policy shall supersede all prior policies or measures of the Company with respect to the External Personal Data.
- **2.4** This Policy is consistent with the external parties consent form on which you have signed your consent. Please carefully review the consent form for such external parties to understand which of your data is processed on the basis of consent.

3. External Personal Data

3.1 Personal Data and Uses

"Personal Data" refers to information about a person which makes the person identifiable, whether directly or indirectly, including how such information is related to or combined with other information to be processed for any specific purposes. However, this does not include the information of the deceased in particular.

"Data Processing" and any other related actions refer to any practice and/or handling of all personal data including collecting, gathering, transfer, disclosure, use, etc.



A list of your personal data that the Company uses and/or is going to use, the purpose of use, and other additional details are shown in the table below. Please study carefully to understand how we process your personal data. The Company has made every effort to clarify the activities of processing your personal data by the Company but the list below may not be able to detail all of the Company's processing.

Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
		eneral	1	
Government Official	Liaising with the government sector. Documents or correspondence in some cases requires the staff to sign for the documents to be kept as evidence.	Legitimate Interest	Name SurnamePositionSignature	Ten years after the information is collected.
External	Exchanging business cards. To	Legitimate	Contact	Ten years
Parties	contact for work when necessary or at appropriate time.	Interest	 information such as name, surname, email address, phone number. Organization Agency 	after the information is collected.
Employee of	Communication for receiving	Legitimate	Name Surname	Ten years
the service provider	services. The Company uses various services from external companies and collects the information of the service provider's employees for communication. (As the processor for an affiliated company)	Interest	 A copy of ID card Contact information such as name, surname, email address, phone number. Organization Agency Work 	after the information is collected.
	Human Resources and General	Administration	experience	
Job Applicants	Human Resources and General Collecting information of job applicants, selection, and interview. The Company will collect general information of people who are interested in applying for a job, which may be collected from various channels such as external websites, the Company's booth at events, or the Company's search for candidate information from the website, etc. (As the processor for an affiliated company)	Administration Contract (for those who contact the Company)	 (Human Resources) Contact information such as name, surname, email, phone number, address, emergency contact information. A copy of ID card Basic qualification information 	If not hired, the information shall be retained for one year after it is collected. If hired, the information shall be retained throughout the employment period and



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
Student internships	Accepting student internships. The Company takes into account the letter requesting for internship, application, and interview to consider qualifications. (As the processor for an affiliated company)	Legitimate Interest (for those contacted by the Company) Contract	such as educational qualifications, diplomas, work certificates, work-related talents, and desired salary. Work history Contact information such as name, surname, email address, phone number. A copy of ID card Qualification information such as	two years thereafter. During the internship period and for the next five years thereafter
Beneficiaries of life insurance of employees of the Company and its affiliates	Management of life insurance premiums payment. In the event of an employee's death, the insurance company will contact the welfare department to coordinate with the beneficiary according to the information that the employee has previously provided. (As the processor for affiliates in the case of beneficiaries of	Legitimate Interest	educational history Name Surname Relationship with employee Contact information such as name, surname, email address, phone number.	Ten years after the information is collected.
Beneficiary of Financial Support	employees of affiliates) Allocation of financial support. As the company provides employees with financial support for weddings, funerals, and scholarships, other external parties associated with employees may also receive such benefits, such as children, daughters, fathers, mothers, and spouses.	Legitimate Interest	 Name Surname Contact information such as name, surname, email address, phone number. A copy of ID card Wedding information such as marriage certificates and invitation cards. Academic transcript 	Ten years after the information is collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
External parties involved in serious accidents.	Management of fatal accidents in the workplace. In the event of an accident in which the symptoms are too serious for the infirmary to handle, the victim will be transported to the hospital.	Legitimate Interest and to prevent danger. Establishment of legal claims (for sensitive information)	Name SurnamePosition	Ten years after the information is collected.
External parties participating in the Company's activities.	Organizing events and activities. These include annual events and ceremonies or other corporate events for the preparation and implementation of internal and external activities and communications.	Legitimate Interest	 Photos and videos from events and activities A copy of ID card 	Ten years after the information is collected. Forever for images that have already been printed or produced.
	Human Resources and Ge	eneral Administ	ration (Legal)	
External parties who sign the contract	Verification and signing of contracts. Entering into contracts with various parties, including contracts with individuals and contracts with business partners, which are contracts between juristic persons. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Contracts (for contracts with natural persons) and Legitimate Interest (for contracts with juristic persons)	 Name Surname A copy of ID card Signature Address Account number 	Ten years after the information is collected.
Relevant External parties	Case management. Retain all types of documents and information about the Company or its affiliates and documents related to any juristic act in which the Company or its affiliates is involved. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest Establishment of legal claims (for sensitive information)	 Name Surname Job position General Personal Data in connection with any juristic act in which the Company is involved General Personal Data in connection with any juristic act in which the Company is involved 	Ten years after the information is collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
Shareholders	Preparation of meeting minutes. Affiliate shareholder meetings, which reports may contain Personal Data of attendees. (As the processor for an affiliated company)	Legal Compliance	 Name and surname of meeting attendees Comments A copy of ID card Meeting minutes 	Ten years after the information is collected.
	Information Tec	chnology Office	e (IT)	
External parties using the Company's internet	Internet system . Information of internet users are collected as it is the requirement of the government to collect information about websites.	Legal Compliance	 Name Surname Name of organization, Affiliated agency VPN code IP Address Information about the use of various websites 	Ten years after the information is collected.
	Business	development	websites	
External parties, such as government officials or other project owners.	Monitoring news and communication of project details. News from general announcements of various departments and companies by contacting the project responsible unit for details or coordination. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest	 Contact information such as name, surname, email address, phone number. 	Ten years after the information is collected.
External parties such as authorized signatory of the company, and business partners. Government Official	Preparing documents for signing and preparing the venue. Coordinate with relevant parties to gather relevant information for the contract.(As the processor for affiliates in the case of beneficiaries of employees of affiliates)Coordination. Supporting tasks such as helping to coordinate various permit applications,	Legitimate Interest Legitimate Interest	 Contact information such as name, surname, email address, phone number. Signature A copy of ID card Contact information such as name, 	Ten years after the information is collected. Ten years after the information is
	and requesting electricity and water supply. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)		surname, email address, phone number.	collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
	Office of Presi	dent (Complianc	 e)	Periou
Shareholders	Preparation of the shareholders' meeting. The Company must prepare documents for shareholders and deliver such documents to shareholders.	Legitimate Interest	 Contact information such as name, surname, email address, phone number. ID Card number Number of shares 	Ten years after the information is collected.
Shareholders and proxies	Arrangement of shareholder meetings. Attendance registrations are accepted during the meeting for comments and discussions.	Legal Compliance	 Name Surname Attendance registration status A copy of ID card Power of attorney 	Ten years after the information is collected.
		Legitimate Interest	 Name and surname of persons giving opinion during the meeting 	
Shareholders and proxies	Preparation of minutes of the shareholders' meeting. Contains Personal Data of directors and attendees who express opinions, which a report will be submitted to the Stock Exchange of Thailand, the Ministry of Commerce, the Thai Institute of Directors Association (IOD), and posted on the Company's website.	Legal Compliance	 Personal Data reported to the Stock Exchange and the Ministry of Commerce such as names, surnames, attendees and attendance registration status. 	Ten years after the information is collected.
		Legitimate Interest	 Personal Data reported to the Stock Exchange and the Ministry of Commerce such as names, surnames, attendees and attendance registration status. 	
Shareholders	Preparing documents for submission to the SEC. Prepare and submit the annual report and Directory of Directors to the SEC.	Legal Compliance	 Personal Data reported to the SEC such as the name and surname of Directors. 	Ten years after the information is collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
	Office	of President		1 chou
Name and surname of meeting attendees	General meeting preparations. Participants must register and exchange business cards, video and audio recordings may be conducted, and minutes of meetings are recorded.	Legitimate Interest	 Name Surname Name cards Name of organization Job position Audio and video recording Meeting minutes 	Ten years after the information is collected.
External Parties	Monitoring relevant news. Monitoring news in order to summarize and prepare reports on the status of various projects, economic conditions and product prices for reference.	Legitimate Interest	 Name Surname People involved in the project Pictures Relevant news 	Ten years after the information is collected.
External parties participating in activities	Issuing press releases and organizing press conferences. These are news and articles written for publicity, covering projects, CSR events and other events. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest	 Name Surname Position Comments or interviews Pictures and videos 	Ten years after the information is collected. Forever for the produced media
External parties requesting financial support	Providing special support. In the event that employees or natural persons make a contact to ask for donations, which the Company has to support, such as medical expenses, and scholarships.	Legitimate Interest	 Contact information such as name, surname, email address, phone number. Supporting documents for requesting donations such as transcripts 	Ten years after the information is collected.
	Pur	chasing	· · ·	
Vendors of material goods (partner companies)	Purchasing various materials. Plans are in place for uses, partner considerations, entering into contracts, and management of goods transportation.	Legitimate Interest	 Contact information such as name, surname, email address, phone number. Position Duties and responsibilities 	Ten years after the information is collected.
Service providers	Contract work, leasing, transportation, and services. Consideration of tender offers, considering the qualifications of labor, which includes both working with juristic persons and natural persons.	Legitimate Interest (for employees of corporate service providers)	 Contact information such as name, surname, email address, phone number. Position Duties and responsibilities 	Ten years after the information is collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
	(As the processor for an affiliated company)	Contracts (for service providers who are natural persons)	 Contact information such as name, surname, email address, phone number. Position Duties and responsibilities Work history Certificates and licenses A copy of ID card Copy of land title deed Bank account 	
	Eng	ineering		
Project owners, service providers, and vendors External parties such as project owners	 Project consideration. To contact project owners, service providers, and vendors. (As the processor for affiliates in the case of beneficiaries of employees of affiliates) Other miscellaneous tasks. such as working on drawings, designing, contacting for services, and organizing public activities such as volunteer work, association work, and supporting work for the Engineering Institute of Thailand. 	Legitimate Interest Legitimate Interest	 Contact information such as name, surname, email address, phone number. Work history Licenses A copy of ID card Contact information such as name, surname, email address, phone number. Pictures and videos 	Ten years after the information is collected. Ten years after the information is collected.
	(As the processor for affiliates in the case of beneficiaries of employees of affiliates)			
		struction		
External parties who need to coordinate	Surveying the area for work planning. Use the information as contacts regarding survey works, reserving tickets and accommodation. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest	 Contact information such as name, surname, email address, phone number. Organization information A copy of ID card Copy of passport Travel records 	Ten years after the information is collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
External parties such as contractors	General construction management. Information is used to handle various situations such as issues regarding work progress, safety, social and local residents' issues. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest	 Contact information such as name, surname, email address, phone number. Position Organization Agency Meeting minutes Records regarding work progress and work. 	Ten years after the information is collected.
External parties involved in accidents.	Security management. To record security reports and record CCTV footage. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest Establishment	 Name Surname Job position General Personal Data related to the accident Sensitive is formation 	Ten years after the information is collected.
		of legal claims (for sensitive information)	information related to security reports	
Government Official	Contacting government officials. For coordination purpose. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Legitimate Interest	 Contact information such as name, surname, email address, phone number. Position Duties and responsibilities 	Ten years after the information is collected.
	Accounti	ng and Finance		
Project owners, service providers, and vendors	Procurement and Financial Management. To make payments and record payments.	Contracts (for natural persons) Legitimate Interest (for juristic persons)	 Contact information such as name, surname, email address, phone number. Bank account Job details Activities for which money is used. 	Ten years after the information is collected.
External parties	Providing information - TRIS Rating Co., Ltd. Figures and documentation are provided with the contract or power of attorney to support the credit rating.	Legitimate Interest	 Name Surname Position Signature A copy of ID card Contact information such as name, surname, email address, phone number. 	Ten years after the information is collected.



Types of Data Subject	Objectives and Data Processing	Base	Examples of Personal Data	Data Retention Period
External parties	Providing information to the SEC. Information about senior management and people related to shareholding is provided.	Legal Compliance	 Name Surname Position Work history A copy of ID card 	Ten years after the information is collected.
Customers who have bought and/or are interested in buying shares	Providing information to the SEC. Information about senior management and people related to shareholding is provided.	Legitimate Interest	 Name Surname Position Phone number Shareholding information 	Ten years after the information is collected.
Employees and executives of affiliated companies	Providing information to the Bank of Thailand and other representative banks. For the bank to prove the documents supporting the juristic act. (As the processor for an affiliated company)	Legal Compliance	 Name Surname Position Work history Salary A copy of ID card 	During the employment period and for the next ten years thereafter
External parties (executives, shareholders and employees of the target company being audited)	Hiring a consultant. In some cases the Company or its affiliates need to employ specialized knowledgeable external consultants to assist in certain tasks such as due diligence, obtaining tax advice, and securities assessments. external personal data must be collected in order to perform such tasks.	Legitimate Interest	 Contact information such as name, surname, email address, phone number. Position Salary 	Ten years after the information is collected.
	in the case of beneficiaries of employees of affiliates)			
External parties involved in the audit.	General internal audit and fraud investigation. For internal and corruption audits and making a summary report. (As the processor for affiliates in the case of beneficiaries of employees of affiliates)	Audit Office Legitimate Interest	 Contact information such as name, surname, email address, phone number. A copy of ID card Related company assets 	Ten years after the information is collected.
		Establishment of legal claims (for sensitive information)	 Sensitive information related to the audit, such as health information. 	
	Other activities that	-		
Relevant external parties	Other activities that use the consent base for processing.	Please refer to t more details.	he External parties con	sent form for

3.2 Data Collection Format

The Company will, in its sole discretion, determine whether to store your personal data related to it in electronic document format or in other formats. The Company will exercise the best effort to provide appropriate security measures to retain such files and documents.

3.3 Consent and Withdrawal of Consent

- (a) The Company will seek your consent (via an external parties consent form) prior to collecting, using, or disclosing personal data that requires consent.
- (b) You may choose to withdraw your consent through written notice to the Company (except for retrospective withdrawal of consent) with fourteen (14) days advance notice. You must contact the Personal Data Protection Officer (relevant details as below) directly to complete the withdrawal of consent. However, please note that the withdrawal of your consent may affect the Company's processing, which the Company will notify you as soon as possible before or after you withdraw your consent. In addition, when you withdraw your consent, the Company will stop collecting, using, or disclosing your Personal Data, as well as prohibiting any intermediaries and agents in doing so, unless such action is required by relevant laws.

3.4 Correction and updating of Personal Data

- (a) You must at all times ensure that the Personal Data relating to you or your family members that you have provided to the Company is true, accurate, and complete. In the event of any change, you must notify the Data Protection Officer or any other personnel designated to handle the change within seven (7) days after the change becomes effective.
- (b) The Company will correct your personal data as soon as possible and notify you of confirmation of such change. In the event that the Company is unable to process the correction within thirty (30) days after receiving the request, the Company will notify you of the time required to process it.

3.5 Transferring and Sharing of Your Personal Data

- (a) The Company, either as a controller or a processor (in which case the processor will follow the controller's instructions) may transfer your Personal Data to subsidiaries or related companies or external service providers located in Thailand so that such service providers can perform certain activities on behalf of the Company such as cloud storage and non-cloud storage services, recruitment services, net compensation management (payroll), analytics services and miscellaneous support or in the case of a legal or legitimate obligation to process personal data such as audits, divestments, or restructuring. The Company will transfer and process such personal data using the same base as notified to you or with your consent. The Company will ensure that the transfer of personal data is supported with protection measures that are equivalent to the protection measures under the law and the Company's standards.
- (b) The Company, either as a controller or a processor (in which case the processor will follow the controller's instructions) may transfer your Personal Data to subsidiaries or related companies or external service providers around the world to enable such service providers to perform certain activities on behalf of the Company such as both cloud storage and non-cloud storage services, recruitment services, net compensation management (payroll), analytics services, and miscellaneous assistance or in the event of a legal or legitimate obligation to process Personal Data such as audits, divestments, or restructuring for processing for any business, the Company will use the original contract base for data transfers outside the country and/or processing. However, in the event of a transfer or processing without a contractual basis, the Company may use any other legally sanctioned measure or may use the consent base you have provided in the online form requesting for website users' consent.

The Company will ensure that the transfer of personal data is supported with protection measures that are equivalent to the protection measures under the law and the Company's standards.

3.6 Personal Data Retention

- (a) The Company will retain your personal data for the period necessary for legal and business purposes, and the Company will immediately cease retaining such personal data if it considers it reasonable to conclude that the retention of personal data is no longer in accordance with the purpose of collecting such Personal Data, and retaining such Personal Data is no longer necessary for legal and business purposes. At present, the Company's policy is that the Company may retain some of your personal data for a period of up to ten (10) years or more after the use of such personal data is no longer necessary (unless otherwise stated in the table in Article 3.1 above). There may be an anonymization process adopted in the retention of the Personal Data and it must comply with the Company's document retention and destruction policy and relevant laws and regulations.
- (b) The Company will notify you if the policy or retention of any of your Personal Data changes in a way that is inconsistent with the current policy or in any other way and is required that you are notified.

4. Personal Data Protection Officer

4.1 Details of the Personal Data Protection Officer are as follows:

Vice President: Legal Department is the Data Protection Officer: DPO) Ch. Karnchang Public Company Limited, No. 587 Viriyathavorn Building, Sutthisan Winitchai Rd., Ratchadaphisek Subdistrict, Dindaeng District, Bangkok 10400 Tel. 02-2750026 Email address: <u>dpo@ckplc.com</u>

4.2 The procedure for receiving and responding to inquiries and/or complaints related to the protection of personal data is detailed below.

The Company realizes the importance of safeguarding and protecting your Personal Data and has prepared various documents related to the collection and use of your Personal Data in accordance with the provisions of the Personal Data Protection Act. If you have any questions or complaints or want to submit a complaint or wish to exercise your legal rights, you can contact the Company or the Company's Personal Data Protection Officer. The Company will respond as soon as possible or proceed with the request to exercise the rights of the data subject within 30 days from the date the Company receives the request for the right to exercise with reasons and information supporting the request including documentary evidence supporting the exercise of the data owner's rights in order to verify and confirm the identity of the data subject. In the event that the process cannot be completed within the said period, the Company reserves the right to notify the data subject in order to extend the processing period as required by law.



5. Rights of Data Subject

- 5.1 Right to be notified. The Company will notify and/or request your additional consent prior to processing your Personal Data under a wider scope in cases where the Company plans to collect, gather, retain, use, or disclose your Personal Data in other formats exceeding the scope to which you have previously given consent or the scope which the Company has previously disclosed to you.
- 5.2 Right to access. You may request access to your personal data for verification at any time, and you may also inquire regarding ways in which we process your personal data.
- 5.3 Right to copies. You may request a copy of your personal data in a form that is reasonably practicable.
- 5.4 Right of portability. You can request that the Company transfer your personal data to another agency of your choice in a reasonable and acceptable manner.
- 5.5 Right of rectification. You are obligated to ensure that your Personal Data is accurate, current, complete, and not misleading. If your Personal Data has been changed, you must submit a request to correct the information by following the procedures as announced by the Company. In addition to being an obligation, the correction of information is also your right.
- 5.6 Right to withdraw consent. You may withdraw your consent at any time. The Company may refuse your consent withdrawal where it is prohibited by law or contract. Withdrawing your consent will not affect the collection, use, and disclosure of your Personal Data that the Company has done in the past. In the event that withdrawing your consent would affect any other part of your personal data, including your rights or interests, the Company will notify you of such impact before proceeding your consent withdrawal or will notify you as soon as possible after the consent has been withdrawn.
- 5.7 Right to erasure. You may submit a request for deletion or request that your personal data be converted to anonymity under the following circumstances: (a) in the event that your personal data is no longer necessary for its original purpose; (b) you have withdrawn your consent and the Company has no legal right to collect, retain, use, or disclose your Personal Data; (c) you object to the collection, retention, use, or disclosure of your personal data and the Company has no right to refuse your objection; or (d) your personal data is collected, retained, used, or disclosed contrary to the law. However, the Company may reject your request in the event that our collection of information is for purposes set out by law, including the collection of research or statistical data for which appropriate safeguards have been taken, or it is necessary for the establishment of a statutory claim, the performance or exercise of a statutory claim.
- 5.8 Right to suspension. You may submit a request to restrain the use of your personal data in the following situations: (a) in the event that the Company is in the process of verifying the accuracy of the information for the purpose of preparing, correcting or updating the Personal Data according to your request; (b) in the event that your Personal Data is about to be erased but you have requested that we suspend the use instead; (c) when it is not necessary to retain your Personal Data for the establishment of a statutory claim, the performance or exercise of a statutory claim, or a defense of a statutory claim; or (d) in the event that the Company is in the process of verifying its legal Legitimate Interest against your objection or against the collection, retain, use, or disclosure of your information for various purposes including research or statistics as may be permitted by law.



- 5.9 Right to object the processing of Personal Data. You may object to the collection, storage, use, or disclosure of your personal data in the following cases.
 - (a) In the event that your Personal Data is collected for: (1) public benefit; (2) compliance with orders from the government; (3)legal Legitimate Interest of the Company or of other juristic persons (which the Company may reject your objection in the event that (3.1) your objection leads to unlawful conduct or (3.2) your objection relates to the establishment of a legal claim, performance or exercise of that right, statutory claims, or raises a statutory defense)
 - (b) In cases where we have collected, retained, used, or disclosed your personal data for direct marketing purposes; or
 - (c) In the event that we have collected, retained, used or disclosed your Personal Data for research purposes as required by law, including for statistical studies purpose.

Announced on June 1, 2022.