

General Personal Data Protection Policy

In order to conduct the business in accordance with corporate governance, Carabao Group Public Company Limited and its Subsidiaries (hereinafter referred to as “Company”) recognize the importance of personal data protection. The Company emphasizes on rights, personal data and personal data protection which are the important fundamental right to privacy that shall be protected under the constitution of Thailand and the Personal Data Protection Act B.E. 2562. Therefore, the Company would like to implement personal data protection policy as follows:

1. Scope of Enforcement

It shall be deemed that this policy is the framework of the Company which the board of directors, executives and all level of employees of the Company shall comply with. All employees and any person who comes into contact with the Company including partners, service providers and stakeholders of the Company, as well as all activities of the Company relating to personal data, such as the process of data collection, type and format of data storage, the propose of the usage of data, data sharing to the Company and other entities, shall comply with personal data protection processes in accordance with Personal Data Protection Act B.E. 2562.

2. Definitions

“Company” means Carabao Group Public Company Limited and its Subsidiaries.

“Subsidiaries” means limited companies or public companies under the control of Carabao Group Public Company Limited in accordance with the Notifications of the Securities and Exchange Commission.

“Personal Data” means any information relating to a person which enables the identification of such person, but not including the information of deceased persons or as prescribed by Laws.

“Laws” means Personal Data Protection Act B.E. 2562 including regulations, notifications enacted under Personal Data Protection Act B.E. 2562 and any additional regulations.

3. Personal Data Collection

Prior consent shall be obtained for the purpose of collection of data from data subject(s) as required by Laws, unless otherwise permitted by Laws.

The Company will inform the data subject(s) of the details of data collection prior to or at the time of collecting the personal data subject(s) to the Laws as follows:

- 3.1 the purpose of the collection, usage and disclosure of personal data.
- 3.2 regarding the compliance of Laws and agreements or in order to enter into any agreement by explaining the possible consequences to the data subject(s) should he/she be unwilling to provide personal data.
- 3.3 the personal data that will be collected and the duration of data storage.
- 3.4 the type of person or organization that such collection of personal data might be disclosed to.
- 3.5 the information of the person who is responsible for the personal data collection.
- 3.6 the rights of data subject(s).
- 3.7 other details as required by Laws.

4. Use and Disclosure of Personal Data

The use and disclosure of personal data shall be in compliance with the purpose that has been previously disclosed to the data subject(s) or compliance with a consent notification from the data subject(s) or as necessary or as benefits of the purpose as mentioned in this policy. If the use and disclosure of personal data is in compliance with the data subject(s)' consent, the Company may request consent from the data subject(s) prior to or at that time of; however, the consent request shall not be required in these following events:

- 4.1 to prevent or avoid danger to an individual's life, body or health.
- 4.2 it is the data that can be legally disclosed to the public.
- 4.3 it is necessary to entitle a legal right to claim, compliance or exercise a right to claim or to set up defense of right to claim.
- 4.4 to abide by the Laws or court's decisions.
- 4.5 others as required by Laws.

5. Quality of Personal Data

The Company shall emphasize the correctness, completeness and the updates of the data, including providing an opportunity for the data subject(s) to correct and update their personal data. Therefore, the data that has been collected shall be corrected, updated, completed and not misunderstood, unless otherwise provided by Laws.

6. Measures of Personal Data Security

The Company has realized the importance of personal data security and has established appropriate measures regarding personal data security to prevent loss, access, destruction, use, modification, correction of or disclosure of personal data unlawfully. The Company provides personal data security by employing technical and management measures.

When the Company transmits or transfers personal data to another country, including collection of personal data in any other databases where the collectors or service providers are in another country. It shall take steps to ensure that the destination country has sufficient personal protection or higher standards than this policy.

The Company will not be responsible for any damage which occurred from the use or disclosure of personal data to any third party including the negligence or ignorance by the data subject(s) or other persons who obtained the consent from the data subject(s) to log out from the system database or online platform of the Company.

7. Rights of Data Subject(s)

The Company assures that the data subject(s) shall have rights to access their personal data, withdraw their consents, transfer their data, delete or destroy data, temporary suspend the use of data as well as update their data to be corrected, updated and completed to be comply with the Personal Data Protection Act B.E. 2562, unless otherwise violate or conflict with the Laws, against the national security, affect economics and commerce of the country, affect the investigation of the legal officers or consideration of the court or affect the liberty and rights of others.

8. Contact Information

The data subject(s) may contact the Company regarding personal data to:

Carabao Group Public Company Limited

Address: 393, 393 Silom Building, 7th-10th Floor, Silom road, Silom district, Bangrak sub-district, Bangkok, 10500.

Telephone: 02-636-6111

email: PDPA@carabao.co.th

9. Liability and Punishment

The Company assigns the employees or the relevant personal data organizations to be aware and responsible for the collection, usage or disclosure of personal data in accordance with this General Personal Data Protection Policy strictly.

Therefore, if the person responsible for the data protection negligent or ignorant in commanding or proceeding to command or commanding or proceeding his/her duties in violation of the Personal Data Protection Policy leading to Laws violation and/or damage(s) occurrence, that person shall be the subject of disciplinary action in accordance with the rules of his/her Company.

10. Review and Changes of the Policy

The Company may review the policy occasionally to ensure that it maintains adherence to the Laws and/or the business of the Company.

This policy is effective from 17 December 2020.

issued on 17 December 2020

(Mr. Sathien Setthasit)

Chief Executive Officer