

## **Personal Data Protection Policy**

### **For Business Partners of Carabao Group Public Company Limited and Subsidiaries**

Carabao Group Public Company Limited and its subsidiaries (“**the Companies**”) recognize the importance of protection for your personal data under the Personal Data Protection Act of B.E. 2562 (including revisions) (“**the Act**”). Therefore, the Companies have publicized this personal data protection policy (“**the Policy**”). The objective of the collection, use and/or disclosure of your personal data as employee, authorized persons, directors, shareholders, representatives and contact persons of current and potential business partners, trading partners or parties contracting with the Company and the subsidiaries in the future (collectively known as “**business partners**”) or any other ordinary persons involved (collectively known as “**you**”). This policy elaborates the process for personal data protection and provides guidelines for properly handling data compliance with the Act.

The Companies collect, use and/or disclose your personal data because the Companies have current or potential business relationships with you or from you are working/representative for or actions on behalf of business partners who have a good relationship with the companies such as the company who sourcing goods or service or have the business communication with the Companies which may involve with you.

#### **1. Personal Data Collected, Used and/or Disclosed by the Companies**

“**Personal data**” means data concerning ordinary persons that can identify the person directly or indirectly as specified below.

“**Sensitive personal data**” means personal data categorized as sensitive personal data by the law.

“**Personal data collected, used and/or disclosed by the Companies**” means data concerning ordinary persons who are employee, authorized persons, directors, shareholders, representatives and contact persons of current and potential business partners, or any other ordinary persons involved whose data was collected by the Companies and affiliates (as specified in Clause 5). The aforementioned data collection depends on the relationship between the Companies and you, and the types of goods or services you require from the Companies. The types of personal data collected by the Companies are as follows:

##### **1.1 Personal Data of Ordinary Person Business Partners**

Your personal data collected, used and/or disclosed by the Companies includes and is not limited to the following personal data:

1) **Personal data** such as first names-last names, titles, nicknames, gender, date of birth, age, identification data issued by the government (such as identification numbers, passport numbers, tax identification numbers, civil-state card numbers), photographs, videos, audio recordings, marital status, number of children, signature, education, business characteristics, job positions and/or occupations.

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2) **Contact data** such as addresses, workplaces, telephone numbers, facsimile numbers and/or email.

3) **Financial data** such as income data, credit card and debit card data, bank account numbers, bank account type, Prompt Pay data and/or income-expense data.

4) **Transaction data** such as data in transactions documents (such as Quotations, purchase orders and contracts) and/or purchasing specifications for goods or services.

5) **Behavior data** such as opinions, complaints, inquiries, recommendations, opinion survey questionnaire and/or data service provide for business partners.

6) **Technical data** such as IP addresses or internet protocols, web beacons, logs, device models and types, hardware specifications such as UDID numbers, media access control data, software specification data such as specifications for iOS (IDFA) advertisers or specifications for Android advertisers (AAID), data connection, data accessibility, data of single sign-on (SSO), Login Log, access time, time spent on the Companies' webpage, cookies, system data entry , search history, data viewing , type and version of browser, time zone settings and locations, plug-in browser, operating systems and platforms and/or other technology on devices to access platforms.

7) **Closed circuit television camera data.** Please see the details on collection, use and/or disclosure of data from the Companies' closed circuit television cameras under the "**Personal Data Protection Policy for the Use of Closed-circuit Television Cameras**" at <https://investor.carabagroup.com/en/corporate-governance/corporate-governance-policy-and-others>

8) **Other personal data** such as membership data (membership card, reward/point collection), social media account including your other personal data that submit to the Companies by willingness or the Companies received from the outside persons or related agencies in accordance with the Companies' business.

**1.2 Personal Data of Employee, Authorized Persons, Directors, Shareholders, Representatives or Contact on behalf of Juristic Person of Business Partners**

Your personal data collected, used and/or disclosed by the Companies as employee, an authorized person, director, shareholder, representative or contact on behalf of juristic person includes and is not limited to the following personal data:

1) **Personal data** such as first names-last names, titles, age, identification data issued by the government (such as identification numbers, passport numbers, tax identification numbers), photographs, videos, audio recordings, signatures and/or education.

2) **Work data** such as business characteristics, statuses, duties, occupations, job positions, companies you work for or where you are an employee, authorized person or representative of that juristic person/corporation pursuant to the law.

3) **Contact data** such as addresses, telephone numbers and/or email.

4) **Transaction data** such as data in transactions documents (such as quotation, purchase orders and contracts) and/or purchasing specifications for goods or services

5) **Other personal data** such as membership data (membership card, reward/point collection), social media account including your other personal data that submit to the Companies by willingness or the Companies received from the outside persons or related agencies in accordance with the Companies' business.

The Companies have no intention to collect sensitive personal data. Nevertheless, in cases where the Companies do collect such of the sensitive personal data, the Companies will collect, use and/or disclose sensitive personal data on the basis of your express consent or only in cases of permitted by the law.

### **1.3 Personal Data of Third Parties**

If you provided the personal data of third parties (such as referral or emergency person) for the Companies or if you required the Companies to disclose personal data of third parties to the outside persons, you have the duty to notify the aforementioned third parties of details in this policy regarding to require for consent from the aforementioned persons (in cases where consent is required). You may check the accuracy and completeness of personal data and inform the Companies of changes matter in such of personal data. Furthermore, you have the duty to enable the Company to collect, use and/or disclose personal data of the aforementioned persons pursuant to the law and prescribed in this policy.

### **1.4 Personal Data of Youths, Quasi-incompetent Persons and Incompetent Persons**

In some cases, prescribed by law, the Companies may not collect, use and/or disclose the personal data of a minor person, quasi-incompetent persons and incompetent persons without the consent from parents, guardians or caregivers. Therefore, if you are aged under 20 years, quasi-incompetent or incompetent person, you may proceed the consent from your parents, guardians or caregivers (in cases where consent is required). If the Companies become aware that the Companies inadvertently obtained personal data of a minor person without the consent from parents or collected personal data from quasi-incompetent or incompetent persons without the consent from guardians or caregivers, the Companies will delete the aforementioned data immediately or collect, use and/or disclose personal data where the Companies may rely on other legal base than the consent.

If the Companies are unable to collect, use and/or disclose personal data based on the Companies' notifications in this policy, the Companies and affiliates may be unable to provide or deliver goods, or perform duties under the contract or work according to the relationship that Companies has with you or continue performing duties prescribed by law.

## **2. Sources of Your Personal Data**

The Companies may collect your personal data that you provide directly to the Companies, or the Companies may receive your personal data from other sources.

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In cases the Companies collect **your personal data directly from you**, the Companies may receive from the following sources:

- 1) Completion and signatures on documents and forms submitted to the Companies to dealing with Goods or service, contracts agreement, questionnaires or surveys, registrations or complaint procedure including any other business operations of the Companies.
- 2) To contact the Companies via the various channels such as telephones, emails, websites or webpages of the Companies or the Companies' social media platforms.
- 3) Access or usage of the Companies' websites or applications.

**The Companies may receive your personal data from other sources such as the following:**

- 1) Public data sources such as the Companies' website, data searched through internet or social media platforms, etc.
- 2) Companies that are business partners, trade partners or contract parties of the Companies.
- 3) Environmental data including affiliates, the Companies' sales representatives or persons known the Companies.
- 4) Data from government agencies.

### **3. Collection, Use and/or Disclosure of Personal Data Under Legal Bases**

The Companies collect, use and/or disclose your personal data under other non-consensual legal bases (such as (1) necessity to perform with contracts, enters into a contracts or execute to contracts with you; (2) abiding by Law (3) necessity for lawful benefits of the Companies or other persons with balance for benefits, the rights and the basic freedoms related to your personal data protection (4) for prevention or suspension any perils harmful to life threatening, body or health (5) the public benefits or perform duty in exercising of state power (6) for establishment and fight for the rights to pursuant the law in the future or other legal bases in accordance with personal data protection laws (depending on the case) for the following objectives:

- 1) **Membership registrations** such as membership applications in order to verify compliance with terms and conditions and various privilege of membership
- 2) **The Companies' business operations**, such as contracting to purchase of goods or services, requesting for the quotation, selecting, issuing the contracts, transactions verification or compliance with contracts as a business partners of the Companies and affiliates, in accordance to open the purchase orders, collect or pay the goods or services, deliver service and product claims, issue receipts and follow-up your debts to the Companies and affiliates, establish databases, report and record evidence and documents to consider of financial support (such as loan offers and credit granting) for you or business partners.

3) **Marketing and marketing communication** such as to notify the information of products and services of the Companies, affiliates and/or business partners, advertisements, marketing activities, re-marketing, sales promotions, reminders, privileges, special offers and promotions of goods or services of the Companies, affiliates and/or business partners as you have specified your needs or have been used such of service both direct and indirect without your consent.

4) **Loyalty programs management** such as to enable you to participate and to create the account of loyalty program for point collection, usage and redemption including to offer the promotion campaign and activities in order to manage the loyalty program and other related services.

5) **Data analysis** such as analysis of your personal data (such as food consumption behaviors, purchased goods, places, quantity and frequency of purchase) for marketing activities and development of goods and services. The Companies will collect and disclose your personal data for your interests and benefits or for lawful benefits or business operations of the Companies, affiliates and/or business partners without exceeding the basic rights of your personal data.

6) **Authentication** such as to verify and identity proofing such of a representative's person, contact persons or a person with authority on behalf of juristic persons to conduct and access contracts and transactions with the Companies and affiliates.

7) **Improvement of business operations, products and services** such as for the benefit of improvement and develop products, services and the locations of the Companies' store and affiliates in different areas to be even better and appropriately to meet the needs of customers in order to plan and prepare business reports, assessments and forecast the Companies' business and affiliates, beside of this, providing the standardize training for the store owners, shooting a show and publicizing on media or social networks to advertise the projects or activities organized by the Companies.

8) **Relationship management** such as management of relationships between you as a business partner of the Companies and affiliates, to communicate with you including replies to your inquiries and to manage your complaints, to survey satisfaction toward products and services of the Companies and affiliates, including to analyze your personal data in order to assess, improve and develop products, services and the locations of the Companies' store and affiliates in different areas to be even better and appropriately to meet the needs of customers of the Companies and affiliates.

9) **Protection of the Companies' benefits** such as risk management, audit supervision and internal operation management of the Companies and affiliates in order to preventing and monitor all the operations of fraud, money laundering, criminal actions or any other illegal actions, investigation, interrogation, creation or exercise legal claims, or provision of witnesses and evidence in legal processes of the Companies and affiliates, and for security withing the buildings or other the facilities of the Companies and affiliates including card exchanges before entering the Companies' areas and recording with closed-circuit television cameras (CCTV).

10) **Compliance with the law** such as for the purpose of complying with legal requirements and law enforcement including disclosures or reports to government agencies pursuant to the law such as the Revenue Department and the Anti-money Laundering Office, etc., including when the Companies receive directives, court summons or government documents directing the Companies to perform any actions requiring the legal authority of that government agency.

11) **Information technology management** such as information technology management and security.

12) **Prevention or suppression of potential danger to lives, bodies or health** such as control of communicable diseases or epidemics.

13) **Performing for business operation changes** such as sales, transfers, business mergers, business revitalization or other similar cases in which the Companies may transfer your personal data to one or more third parties as part of the aforementioned actions.

#### 4. **Collection, Use and/or Disclosure of Personal Data that Requires Your Consent**

The Companies collect, use and/or discloses your personal data under the basis of consent for the following objectives:

1) **Marketing and marketing communication** such as to notify the information of products and services of the Companies, affiliates and/or business partners, advertisements, marketing activities, re-marketing, sales promotions, reminders, privileges, special offers and promotions of goods or services of the Companies, affiliates and/or business partners and disclosure the personal data to affiliates and/or business partners of the Companies to purpose the products, services, special privileges and special officers that benefit you in which the Companies may not rely on other legal bases.

2) **Data analytics Business for data analytics business operations.**

#### 5. **Disclosure of Your Personal Data**

The affiliates to which the Companies may disclose your personal data are companies in the Carabao Group, namely, Carabao Group Public Company Limited and subsidiaries, companies in the CJ Group, namely, C.J. Express Group Company Limited and subsidiaries, companies in the TD Group, namely, TD Tawandang Company Limited and subsidiaries, and companies in the Tawandang Group, namely, Tawandang 1999 Company Limited and subsidiaries ("**affiliates**") for objectives in marketing, business operations, selling products or services including any actions stated in this policy. The Company may have advertisement media connected to other websites, mobile phone applications, social media and online communications channels. The aforementioned platforms may have the prescribed in term of use or privacy policy that different from the personal data protection policy and term of use of the Companies. The Companies advise you to review on the aforementioned platforms by yourself. Furthermore, affiliates also depend on consent received by the Companies.

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If required, the Companies may disclose your personal data to government agencies or any other agencies pursuant to the law such as the Revenue Department and the Anti-money Laundering Office, etc., or disclose data in compliance with any directives from government agencies or regulatory agencies in addition to providing your personal data for credit data agencies in order to check and possibly use the findings from the aforementioned data examination to prevent fraud or corruption.

The Companies may disclose your personal data to related third parties such as service providers, business partners, trade partners and contract parties of the Companies to take actions related to audits, legal consultation, prosecution of legal cases and any other actions necessary for business operations of the Companies and affiliates. However, the Companies will provide personal data for the other persons only as necessary for the aforementioned services. The Companies will request for the other persons to not use personal data for any other purpose in addition to taking actions to ensure that all other persons with the Companies' work maintain personal data with safety.

In some cases, the Companies may disclose or provide your personal data to investors, shareholders, recipients of rights transfers, persons who will receive rights transfers, transfer recipients or persons who will become transfer recipients when the Companies have a corporate restructuring, debt restructuring, business merging, business acquisition, sale, purchase, joint ventures, rights transfers, discontinuation of business or any similar events and having the Companies' business, assets or shares transferred or distributed whether in whole or in part.

The Companies may disclose personal data under legal bases to other persons according to objectives stated in this policy such as ordinary persons, complainers or other persons who requested to see data from closed-circuit television cameras, etc., depending on the case.

## **6. Transfer of Your Personal Data Abroad**

The Companies may disclose or transfer your personal data abroad to other person or servers in destined countries which may or may not have equivalent personal data protection standards. The Companies will follow steps and measures to ensure personal data is transferred safely and recipient has suitable personal data protection standards and such personal data transfers are legally and permitted by law.

## **7. Personal Data Storage, Storage Times, and Security Measures**

The Companies will store your personal data as necessary in line with the objectives stated in this policy. The Companies will consider a suitable time for storing your personal data based on purchase/sale times, service provision, contracts, and legal prescription. Furthermore, the Companies may continue to store the aforementioned data as the period necessary for legal compliance, creation and exercise legal claims legal prescription.

The Companies will store personal data in document formats and/or computer or electronic systems by providing appropriate security measures for personal data including administrative safeguards, technical

safeguards and physical safeguards in relation to access control for the use of data including appropriate modifications and revisions of measures to prevent loss, illegal access, use, edition, revision or disclosure of personal data without legal authority in order to ensure security of your personal data confidentiality, integrity and availability.

In particular, the Companies limit access and use technology to maintain safety of your data by requiring permissions or rights to access data with user access management allowing only authorized persons to access data and user responsibilities designation to prevent unauthorized, disclosure, reveal, smuggling, copies of data or theft of stored data or processing devices. Moreover, the Companies arrange methods to enable retrospective tracing of data accession in relation to access, change, deletion, or transfer. When your data has been disclosed to outside persons that process

The Companies will delete or destroy personal data within 30 days from the end of the storage period.

## **8. Your Rights as the Personal Data Owner**

As the data owner, you have the right to withdraw your consent granted to the Companies at any time, except in cases where consent withdrawal is limited by laws or contracts that benefit you. Consent withdrawal does not have effects on processing of personal data which you previously and legally granted to the Companies.

You have the right to request access or copies of personal data collected, used and/or disclosed by the Companies. You have the right to request transfer of your data organized by the Companies in electronically readable format and you have the right to request the Companies to send your personal data to other people as you intend (the Companies reserve the right to collect appropriate expenses based on real conditions (if any)).

You have the right to object the collection, use and/or disclosure of personal data in cases specified by law. You have the right to request the Companies to erase or destroy or make your personal data anonymous by any means as well as the right to suspend use of your personal data except in cases where there are legal limitations.

The Companies will use the best efforts to keep your personal data accurate and up to date for the completion data and not cause misunderstandings. You have the right to request revisions and changes your personal data. When you revise or change your personal data or if you see that data possessed by the Companies is incomplete or inaccurate, this may cause misunderstandings or data may not be up to date.

Exercise of your rights specified above must be in compliance with the law and the Companies may refuse your abovementioned rights based on legal limitations.

You have the right to file complaints with authorized officials pursuant to the Act if you are of view that the Companies or other persons working on behalf of the Companies to collect, use and/or disclose your personal data do not comply with the Act. Nevertheless, the Companies would like you to inform the



Companies of your concerns to resolve it before the aforementioned concerns contacting the agencies involved.

When submitting a request to exercise your rights, you can contact the Data Protection Officer (DPO) or the person with the duty and responsibility for personal data using contact channels specified in this policy.

#### **9. Cookies**

When you visit the Companies' website, the Companies may place cookies in your device and use cookies to collect your personal data. You can study the Companies' cookies policy for more information at <https://investor.carabaogroup.com/storage/content/corporate-governance/corporate-governance-policy/20210824-cbg-cookie-policy-en.pdf>

#### **10. Policy Changes**

The Companies may review and revise this policy to be consistent with any changed rules and regulations. If the Companies modified, changed or made revisions to this policy, the Companies will publicize the revision through appropriate channels such as notifications on the Companies' website, etc. Please check this policy periodically to see revisions or modifications made. The Companies will remind you if the revision have significantly affected you, the company will request your re-consent on the necessity and when legally required to do so.

#### **11. Contact Channels**

You can contact the Companies and/or Data Protection Officers (DPOs) via the following channels in cases where you have additional recommendations or questions concerning protection for your personal data:

##### **Carabao Group Public Company Limited and Subsidiaries**

- Place of Contact: Carabao Group Public Company Limited  
393, 393 Silom Building 7<sup>th</sup> - 10<sup>th</sup> floor, Silom Road, Silom, Bangrak, Bangkok, 10500
- Contact Channels: Tel. 02-636-6111

For a Data Protection Officer (DPO) or a person the duties and responsibilities for your personal data, you can contact Email: [PDPA@carabao.co.th](mailto:PDPA@carabao.co.th).