

Privacy Notice for Shareholders

Sappe Public Company Limited and affiliated companies (hereinafter called the “**Company**”) give top priority to your privacy and are determined to safeguard your personal data (hereinafter called “**Personal Data**”) in accordance with the Personal Data Protection Act B.E. 2562 (hereinafter called the “**PDPA**”) and the amended version with further amendments as well as relevant laws and regulations which will be issued under the PDPA. The Company, therefore, has established a privacy notice for your acknowledgement about collection, compilation, use, and/or disclosure of your Personal Data.

1. Purpose of collection, use and disclosure of Personal Data

The Company shall collect, use and disclose your Personal Data when having appropriate reasons in processing and/or as required by law including the disclosure of Personal Data to the third party with the following purposes:

- 1.1 For compliance with the contract or before making a contract with the Company.
- 1.2 For processing your Personal Data in compliance with laws, regulations, principles, rules or legal obligations.
- 1.3 For compliance with the regulations and audit of the Company’s business (both internal and external).
- 1.4 For the benefit of identity verification of the shareholder and those involved or have relationship with the shareholder.
- 1.5 For the legitimate interests of the Company to process your Personal Data based on your basic rights which is not above the interests of the Company.
- 1.6 For any particular purpose under your consent given to the Company in the processing of your Personal Data.

2. Personal Data collection

The Company collects and uses various types of Personal Data and the type of data collected by the Company depends on the situation and the event related to the relationship between you and the Company in the status of shareholder of the Company.

2.1 Sources of Personal Data Collection

The Company collects your Personal Data from various sources such as:

- Personal Data collected directly from you, which is part of reserving share/debenture, acquisition of share/debenture, registration to become the shareholder or debenture holder, or verification documents such as national identity card, passport and driving license.
- Contact you through the shareholders’ meeting, the Company’s annual general/extraordinary meetings, or the other equipment such as CCTV, picture and VDO recorders.
- The conversation between you and the Company including a record of telephone calls, letters, emails, memo, or any other methods.
- Personal Data which the Company obtains or may obtain when you sign in the Company’s system, equipment, and website.
- Participation in any activity of the Company.

In some cases, the Company may collect your Personal Data from the other parties such as stock registrar, securities registrar, broker, and securities depository center.

2.2 Type of Personal Data for collection, use, or disclosure.

The types of your Personal Data that the Company collects, uses, or discloses (shall be collectively called “process”) under the relevant laws include, but not limited to the following Personal Data.

- **Personal data:** Name, surname, gender, date of birth, marital status, ID card number, passport number, nationality, photo on ID card, passport, signature, photograph, image, or footage from CCTV.
- **Contact data:** Address, telephone number, fax, and email.
- **Occupation data:** Experiences and working background, and administration or holding the position in the other companies or businesses.
- **Family data:** Name and the other information of spouse, family members, and dependent including the shareholding, employment history and the administration or holding the position in the Company or other businesses of the said person.
- **Financial and transaction data:** Bank accounts.
- **Shareholding detail:** Shareholders’ registration number, shareholders’ record including ownership, number of share/debenture, reservation of share/debenture, sale of shares, the right to receive dividend, voting, appointment of proxy, tender offer and proposal to sell shares, conditions and date to exercise the rights, copy of shareholders’ enquiry and complaint and other contacts between you and the Company in the capacity of shareholder.
- **Contract data:** Regulations and conditions of your shareholding contract.
- **Sensitive personal data**
 - Religious data.
 - Health data such as food and drug allergy.

The Company may collect some of your sensitive Personal Data to enable you to perform your duty as a shareholder, and to comply with the legal obligations. However, the Company shall not collect, use and/or disclose this type of data without your consent, unless it is allowed by law.

2.3 Refusal to provide Personal Data to the Company.

In case that the Company needs to collect your Personal Data and you refuse to give your Personal Data to the Company, the Company may decline to carry out the other related processes.

3. Personal Data Processing

In the proceeding to attain the purposes, the Company may process your Personal Data based on relevant laws and lawful basis. The Company processes Personal Data as stated under lawful basis as follows:

Purposes of collection, use and disclosure of Personal Data	Lawful Basis in Personal Data Processing
<ul style="list-style-type: none"> • For participation in the shareholders’ meeting. • To allow you to exercise your right in the capacity of shareholder, voting, and appointment of proxy. • For registering the Company’s book of shareholders’ registration including keeping and updating the data. • For dividend payment. • To contact you about the data related to the shareholders including the letter to the shareholders, the invitation to 	<ul style="list-style-type: none"> • Contract • Legal Obligation

Purposes of collection, use and disclosure of Personal Data	Lawful Basis in Personal Data Processing
<p>attend the meeting, announcement, information about dividend payment, minutes of meeting, including the Company's annual general meeting and the other extraordinary meetings which shall be held occasionally.</p> <ul style="list-style-type: none"> To provide your Personal Data for authorized officers including share registrar and securities registrar for the benefit of your shareholding management on behalf of the Company. To be in accordance with legal requirements. 	
<ul style="list-style-type: none"> For collecting health and food allergy data of the shareholders who are interested in attending the Company's meeting or participating in activities. For inspecting and collecting identity verification evidence or documents which may include the documents containing sensitive Personal Data. 	<ul style="list-style-type: none"> Consent
<ul style="list-style-type: none"> For efficient internal audit and management of the Company's business. For adherence to the regulations and the inspection of the Company's business (both internal and external). For organizing activities to allow the shareholders to take part in and recognize the Company's business in brief such as arranging the visit to the Company. 	<ul style="list-style-type: none"> Legitimate Interests

4. Disclosure of Personal Data

The Company may disclose or forward your Personal Data to the third party allowing them to process your data as follows:

4.1 Disclosure of Personal Data to the third party

- Subcontractor, broker and other service providers working for the Company or provide service to the Company. They include subcontractors, service providers, supervisors, and workers of aforementioned persons.
- Authorized person who is assigned to manage and oversee your interests.
- Your agent, contact person and representatives.
- Any person or company involved in the Company's restructuring, merger or acquisition of business which occur or may occur. This also include transfer of right or any duty in which the Company has under the contract between the Company and you.
- Law enforcement agencies, the government, courts, the agencies responsible for dispute settlement, the Company's regulators, auditors and any person designated or requested by the Company's regulators to examine the Company's operations.
- Anti-corruption agencies which use the data to investigate and prevent corruption and other financial crimes.
- Any person who issues orders or carries out business management on your behalf such as the attorney, lawyer, and/or

- Any person who obtains your Personal Data through the Company which receives your order to disclose the data to the said person.

4.2 Sending or transferring Personal Data to foreign countries

The Company may have to send or transfer your Personal Data to foreign countries in order to store and/or process in compliance with the agreement between you and the Company. The Company shall not allow irrelevant persons to access such Personal Data, and will set appropriate measures for protection.

5. Personal Data retention

The Company will retain your Personal Data for a duration necessary to achieve the purposes of retention and processing such data which is related to the arrangement of activities, making activity records, and publicizing the activities, and/or to comply with the relevant laws. The Company will retain your Personal Data for the whole period as required by the relevant laws and/or as necessary to attain the purposes specified in No.1. The Company will destruct, delete or make such Personal Data unable to identify the owner of Personal Data, except for legal necessity or supportive technical reasons that could make the Company retain your Personal Data longer.

6. Rights of data owner

You have the rights in your Personal Data according to the Personal Data Protection Act, B.E. 2562. The Company will respect your rights and will promptly respond to the processing in particular situations based on the relevant laws, regulations and rules.

You hold the right to carry out action on your Personal Data as follows:

Rights of Personal Data Subject	Explanation
Right of access	You are entitled to access your Personal Data and request the Company to give you duplication of the said data as prescribed by the personal data protection law.
Right to data portability	You are entitled to request for obtaining your Personal Data and entitled to request the Company to send or transfer your Personal Data to the other data controllers or to you, except not technically feasible in accordance with the personal data protection law.
Right to object	You are entitled to file an objection against the processing of your Personal Data in line with the personal data protection law.
Right to erase	You may request the Company to erase, destruct or make your Personal Data unable to identify the data owner in accordance with the personal data protection law.
Right to restrict processing	You are entitled to request the Company to stop processing your Personal Data as required by the personal data protection law.
Right to rectification	You are entitled to rectify your Personal Data for accuracy if your Personal Data is not accurate, not up-to-date, incomplete or mislead.
Right to revoke consent	In case that the Company has your consent in processing your Personal Data, you are entitled to revoke the consent of processing Personal Data in which you made with the Company.

Right to lodge complaint	If you have concerns or questions about the Company's practices related to your Personal Data, please contact the Company with the information provided in No.7 of this notice. In case there is reasonable basis to believe that the Company violated the personal data protection law, you are entitled to lodge a complaint to the expert committee which is appointed by the Personal Data Protection Committee in accordance with the rules and legal procedure as prescribed in the personal data protection law.
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The Company reserves the right to consider your request to exercise your right and will proceed as required by the PDPA.

7. Contact information

If you have any enquires or want to exercise your right as specified in the notice, you can contact the Company at the following address:

Sappe Public Company Limited

71 SP Arcade, 3rd FL, Ramkhamhaeng Road, Huamark, Bang Kapi, Bangkok 10240

Tel: 02-319-4949 Fax: 02-319-7337

Email: pdpa@sappe.com

8. Amendment to this privacy notice

The Company may amend this privacy notice to be in accordance with any change about the processing of your Personal Data, and in compliance with the PDPA or other relevant laws specified by the Company. The Company will notify you of the important amendment through appropriate channels.