



บริษัท ทีทีซีแอล จำกัด (มหาชน)
TTCL PUBLIC COMPANY LIMITED

COMPANY REGISTRATION NO. 0107551000185 (HEAD OFFICE)
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TTCL Personal Data Privacy Policy

TTCL Public Company Limited gives highest priority to the protection of personal data privacy which is an important fundamental right for the privacy that was protected by the Thailand's Constitution and the Universal Declaration of Human Rights which everyone has the right to be protected in accordance with the law on protection of personal data. Therefore, the board of directors has announced the Company's personal data protection policy as a principle for personal data protection as follows:

1. Enforcement

- 1.1 The policy applies to board of directors, directors, executives and employees at all levels of the company and subsidiaries, including partners, service providers and stakeholders of the company.
- 1.2 The policy applies to all company's activities which related to personal data, such as storage channels, types and Format of the data stored The Company's Purpose for Using Personal Data Sharing such information with others as well as how the Company takes action to protect personal information.

2. Meaning

<i>Company</i>	means TTCL Public Company Limited
<i>Subsidiaries</i>	means limited company which is under the control of the company with characteristics in accordance with the Notification of the Securities and Exchange Commission

Personal Data

means information about a person which makes it possible to identify that person whether directly or indirectly, such as name, surname, photo, ID card number passport number Bank account number, address, date of birth Education History Email Address Phone Number Line ID and IP Address Race Religion Medical History criminal records, etc., but does not include information of the deceased in particular.

Sensitive Personal Data

means sensitive information and may cause the owner of the information being unfairly discriminated against, for example; race, religion, political opinion medical history and crime Genetic information, biological information or any other information which affects the owner of the personal data in a similar way.

Personal Data's owner

means a person whose personal information can identify that person, whether directly or indirectly.

Controller of Personal Data

means a person or a juristic person, which has the power to make decisions about the processing of personal data.

Source of Personal Data

means a source that receives personal data from the personal data 's owner and from other sources with the consent of the data's owner or legal act to do so without the consent of the data's owner, such as

- Delivery of documents supporting business contracts. or an employment contract with the company.

- Submission of supporting documents for the job application and providing information about the recruiting process from the various channels the company uses to recruit employees.
- Human Resources Management such as an employment contract Employee profile storage.
- Recording of still images or movies by CCTV (CCTV) in locations under the Company's control.
- Collection of biometric data such as fingerprint data, face image data.
- Collected the personal data by the third parties such as; family members ,who can be contacted in case of, emergency beneficiary work guarantor job sites, referrals, educational institutions, regardless of whether, the owner of the personal information is the person who discloses the information himself or who has given his consent to the disclosure of such personal data.

3. Purpose of collecting personal data

- 3.1 For the benefit of the Company's operations such as procurement, contracting, financial transactions Company activities various coordination
- 3.2 To improve the quality of work to be more efficient, for example; creating a database analyze and develop the company's operating processes and for any other purpose that is not prohibited by law and/or to comply with laws or regulations relevant to the Company's operations.

- 3.3 For use in contracting with partners in employment or procurement for operations in various fields.
- 3.4 The Company will not do anything different from that stated in the purpose of data collection except:
- The company will notify the new purpose to the owner of the information and obtaining the consent of the data subject.
 - It is in compliance with the Personal Data Act or other relevant laws.

4. Collection of personal data

The company will collect a personal data for the purpose, scope and by lawful and fair methods. The collection will be done only to the extent necessary to operate for the purposes of the company. The company will notify the data's owner before collecting the information. In the event that, the company collects sensitive personal data of the personal data, the company will obtain consent from the data subject before collecting expressly, unless the collection of personal data and sensitive personal data is subject to exemptions under the Personal Data Protection Act B.E. 2562 or other laws.

5. Disclosure, use and duration of personal data collection

- 5.1 The use and disclosure of information must be consented by personal data's owner provided before or at that time. There is a process for administration and implementation of the personal data protection policy to the purpose or as necessary for the benefit that is directly related to the purpose of the collection.
- 5.2 The processing period for collecting personal data will be stored in accordance with the timeframe for maintaining your status as an employee, partner or for a period of time required by law. In the case of information was required by law to be collected, such as tax account information.

6. Asking for Consent and Possible Effects of Withdrawing Consent

- 6.1 The Company collects and processes personal data with the consent of the data's owner. The data owner has the right to withdraw the consent given to the company at any time. This withdrawal of consent will not affect the collecting; using, discarding or processing of personal data has been given consent.
- 6.2 In case of urgent need to relating the safety of life and health of the data subject the personal data controller may consider it on a case-by-case basis. And to prevent or suppress the dangers that will occur to life a person's body or health without consent.
- 6.3 If the disclosure of personal information occurs relating to legal requirements Investigations by legal authorities' trial or by court order the company is not obliged to obtain consent from the data subject.
- 6.4 If the data subject withdraws the consent they have given to the Company or refuse to provide certain information this may result in the company being unable to operate. To fulfill some or all of the purposes stated in the Privacy Policy.

7. Roles, duties and responsibilities

- 7.1 The Board of Directors has roles, duties and responsibilities in supervising the creation of a personal data governance structure and internal controls for compliance with the law and privacy policy of the company.
- 7.2 Personal Data Protection Committee
 - Provide a personal data governance structure and relevant internal controls including management policy Guidelines for responding to unusual incidents involving personal data to be able to identify and deal with relevant incidents in a timely manner.
 - Evaluate the efficiency, follow up, and control the agencies that deal with personal data Comply with the privacy policy and report

the results of such assessment to the Board of Directors for acknowledgment.

- Appoint the Company's personal data protection officer as required by law.

7.3 Executives and heads of departments

- Provide advice to employees in the department and other related persons about compliance The Personal Data Protection Act of 2019, as well as other personal data protection laws

- Supervise the collection, record, organize, use, update and disclosure of personal information of the organization and related personnel in accordance with the Personal Data Protection Law and data protection policy

- Determine the scope, purpose of processing personal data and the period of storage to the extent necessary under the lawful purposes.

- Maintain confidentiality of personal information from performing duties strictly

7.4 Employees at all levels of the Company

- Process, collect, record, organize, improve, use, disclose personal information as instructed of the company and will maintain confidentiality Integrity, integrity and security, request for personal information appropriately and adequately.

- Comply with laws, policies, operational standards, guidelines, procedures and other documents related to the protection of personal data

7.5 Personal Data Subject

- Have a duty to give consent for the company to process personal data in order to carry out processes and procedures for internal administration in the company in accordance with the rules and regulations and in accordance with the Act Protection of Personal Information B.E. 2562

8. Security measures for personal data

- 8.1 Determine the right to access or use, disclosure, processing of personal data this includes showing or verifying your identity. People's accessing or using personal data accord to the company's policy strictly.
- 8.2 In sending, transferring personal data to foreign countries including the use of personal data to be stored on databases in any other system abroad the destination country of collection must have adequate personal data protection measures in accordance with this policy and or measures and exceptions as required by the privacy law of Thailand.
- 8.3 The Company conducts a review and assessment of the effectiveness of personal data protection by an internal audit unit.

9. Rights relating to personal data

personal data subject has the right to request access to their personal data and the right to obtain a copy of such personal data Request deletion or destruction of data temporarily suspended as well as the right to request amendments to the information to be correct, up-to-date and complete at all times in accordance with the law relating to personal data unless it is contrary to or inconsistent with the provisions of the law Impact on the Security of the Kingdom affect the economy and commerce of the country Affects a statutory competent official investigation or a court hearing or affecting the rights and liberties of other people.

10. Contact

In the event that, the owner of the data has doubts and wants to ask for more information, you can contact the company at:

Personal Data Protection Center

TTCL Public Company Limited

No. 159/41-44 Sermmit Tower, 25th Floor, Soi Sukhumvit 21, North-Khlong Toei Sub-district, Wattana District

Bangkok 10110

Email Address: Data.privacy@ttcl.com Phone: 02-2608505



11. Penalty

Persons who are responsible for carrying out any matter in accordance with their duties, if neglecting or refraining from directing or failing to perform or direct or perform any one of their duties This is a violation of policies and practices regarding personal information, until causing legal liability and/or damage. That person must be subject to disciplinary action according to the Company's regulations. If such offense causes damage to the Company and/or any other person The Company may consider further legal proceedings.

12. Changes in policies and measures and procedures

The Company will review the company's policies and measures and procedures from time to time to comply with the changing conditions and will announce and disseminate as appropriate.

This policy is effective from 1st August 2022 onwards.

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(Mr. Hironobu Iriya)
President & CEO