PERSONAL DATA PROTECTION POLICY

OF

MAYEKAWA (THAILAND) CO., LTD.

OBJECTIVE

To comply with Personal Data Protection Act B.E. 2019 ("**PDPA**") and other relevant law, including any future amended law. Mayekawa (Thailand) Co., Ltd. ("**Company**"), therefore, has prepared this Personal Data Protection Policy ("**Policy**"), to explain the procedure of Company, to describe details with regards to the collection, use, disclosure of Personal Data to personnel and staffs of the Company or personnel and employees of third parties representing or acting on behalf of the Company in processing of Personal Data relating to the business operation of the Company, in accordance with the PDPA.

DEFINITION

Personal Data means any information related to natural person, which enable to identify such person, for example Name, Surname, address, birth date, sex, education history, TEL, ID card No. including any other information related to any person and enable to identify such persona either direct or indirectly.

Sensitive Personal Data means data concerning racial, ethnic origin, political opinion, cult, religious or philosophical belief, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or any of the data which may cause unfair discrimination to the Data Owner or affect the Data Subject in the same manner as specified by PDPA

Data Subject means a natural person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of Personal Data

Data Controller means a natural person or juristic person having the power and duties to make decisions regarding collection, use, or disclosure of the Personal Data.

Data Processor means a natural person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of the Data Controller, whereby such person or juristic person is not the Data Controller.

Data Process means the operation in relation to the collection, use, disclosure, limit, eraser or destruction of Personal Data.

Legal Basis means justifiable ground to collect Personal Data as prescribed in PDPA

ROPA means "Record of Personal Data Processing Activities"

SOURCE OF PERSONAL DATA

In general, the Company derive personal data from the Data Subject directly, for example:

- Contacting Company through various channel e.g., TEL, email, social network etc., inquire Company's product or service or issue PO for the product or service to Company.
- Carrying out the obligation, signing the contract or issuing Purchase Order to purchase Company's product or service
- Proposing quotation of Company's product or service through the above-mentioned communication channel, or when Company has inquired the Supplier for the price of product or service.
- Joining Company's activities for example, in the exhibition and taking photo or video or filling the questionnaire of Company.
- Auto collecting personal data, e.g., when access Company's website or application etc.

Obtaining Personal Data from other source, not from the Data Subject directly, for example:

- Received from other Mayekawa Group Companies or any its subsidiaries.
- Received from Customer, Contractor, Supplier or Company's staff.
- Received from Government Agency or other public source.

In such the above cases, the Company has a duty to send the Privacy Notice to the Data Subject before or while collection Personal Data without delay and within 30 days from the collection date.

SOURCING OUTSIDE CONTRACTOR OR SERVICE PROVIDER TO PROCESS DATA OF THE COMPANY

In case of hiring outsource Company or person to collect, use or disclosure personal data according to the order of Company, for example, hiring outside paper shredding, VISA or Work Permit Agency, Payroll Programming Developer including process payroll on behalf of Company, Tourist Organizer etc.

1 Select the Company or person having the standardized data protection systems or safeguards.
2 Company shall make data processing contract with the Company or person to control performance of their duties in accordance with PDPA and this policy
3 Company may assign this outsource Company or person to send Privacy Notice on behalf of Company.

PERSONAL DATA COLLECTION

Company shall collect Personal Data with objective, scope and method comply with Law and fairness. While collecting Personal Data, Company shall perform to the extent where it is necessary to achieve the objective only. In Collection, use, or disclosure Personal Data shall be performed on legal basis as guided in the PDPA act as follows:

1. In case of general person: the collection must be carried in compliance with one or more of the seven legal bases has been met as follows:
   a. Be consented from Data Subject (Consent Basis), or
   b. It is for scientific, historical, or statistical research purpose, or other public interests, or
   c. To prevent or suppress danger to life, body, or health of the Data Subject, or
   d. To perform the obligation of the contract of which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract or purchase order issued to Contractor or Supplier, or
   e. To carry out the activities in relation to public interest

f. To comply with law legally (Legal Basis), for example keep the Personal Data for the sake of investigation of the legal authority or court proceeding etc., or
g. To comply with law enforced on Company (Legal Duty Basis), for example, maintain staff information in compliance with labor law, keep accounting documents in a certain period as specified by the law etc.

2. In case of Sensitive Personal Data, Company may collect, use, or disclose such sensitive personal data only when the Data Owner has given his or her explicit consent, except such sensitive personal data is falling under the exception by law as follows:
   a. To prevent or suppress danger to the life, body or health of a person, where the Data Owner is incapable of giving consent by whatever reason, often for emergencies.
   b. It is information that is disclosed to the public with the explicit consent of the Data Owner.
   c. It is necessary for compliance with the law.

3. Guidance in collecting of Personal Data

Personal Data must be collected, solely, to the extent where it is necessary to achieve the objective of Company. Company is required to consider on the request and select the collected data deemed necessary for the use, and erase or destroy the data which is considered unnecessary. Especially, Sensitive Personal Data, e.g., religious, blood group, etc. Company, once, has received it, must find the way making it disappeared from the copy of ID card or electronic photo This is for the purpose of reducing the risks in unlawfully collecting, using, and disclosing the Personal Data.

PRIVACY NOTICE FOR PERSONAL DATA SUBJECT

When collecting, using or disclosing Personal Data, Company shall create and provide a Privacy Notice to the Personal Data Subject to declare the detail of Personal Data processing, Definitions, The personal data which Company collects, objective of collecting Personal Data, Legal basis of such collection, retention period and expected duration, type of persons or organizations Personal Data may be disclosed to, contact details of Company, rights of the Data Subject and other relevant details, so that the Data Subject knows and understand and consider providing their consent in the event that the collection of Personal Data is not within other legal basis which Personal Data can be collected without consent.

For Personal Data which Company has collected, used or disclosed it prior to having this policy, and it still necessary for Company to continue to collect, use or disclose that data, in which case, Company must inform or deliver the Privacy Notice to the Data Subject without delay.

RIGHTS OF THE DATA SUBJECT

Company aware that the Data Subject has the right to take any action regarding his/her Personal Data in the Company's possession as stipulated in the Personal Data Protection Laws. Thus, the Company is required to provide a Data Subject Request Form to facilitate the Data Subject in notifying his/her intention to exercise his/her rights. The Data Subject's rights under the PDPA are as follow;

1 Right to withdraw consent
2 Right to request access to and obtain a copy of the Personal Data
3 Right to request, to receive and send or transfer of Personal Data
4 Right to object the collection, use, or disclosure of Personal Data

5 Right to erase Personal Data
6 Right to restrict the use of Personal Data
7 Right to rectification.
8 Right to file a complaint

The Data Subject can exercise the above rights by submit a written complaint to Company's below contact. Company shall consider and reply the result to Data Subject within 30 days from the complaint receipt date, however Company may object such right of the Data Subject in case it is required by law.

PERSONAL DATA PROTECTION MEASURES

Company must provide appropriate security measures, from both policy and technical perspective, in order to prevent any loss, unauthorized access, use, alteration, or disclosure of Personal Data. In addition, Company shall further review such measures when it is necessary or when there is any technology advancement to ensure that Personal Data is treated in a secure manner in Company and in accordance with the standard prescribed by the Law.

RECORD OF USAGE AND DISCLOSURE OF PERSONAL DATA(ROPA)

Company shall arrange the record of each work processing in collecting, using and disclosing of Personal Data, to be complied with PDPA's requirement. This record of work processing must include minimum contents as follows:

- The list of the collected Personal Data with the objectives and the retention periods,
- The usage or disclosure of Personal Data under the legal basis or other than consent,
- The right, method and condition for exercising of rights to access the information of Data Owner.
- Rejection or objection of request to exercise the rights, including the reasons as defined herein this policy, and
- The explanation of security measures which the Company has prepared.

This shall be arranged for Data Subject can examine and enforce their rights where the Data Subject has notified or requested to Company.

SENDING OR TRANSFERRING PERSONAL DATA TO FOREIGN COUNTRIES OR INTERNATIONAL ORGANIZATION

Company may send or transfer Personal Data to foreign countries on the condition that the destination country has adequate data protection standards comply with law. If Personal Data Protection standard of a destination country is inadequate. The transfer of personal Data must be carried out in accordance with the following.

- Where it complies with Laws.
- Where the explicit consent of Data Owner has been obtained
- Where it is necessary for the performance of a contract to which the Data Owner is a party
- Where it is for compliance with a contract between the Company and other person or juristic persons for the interests of the Data Owner
- Where it is to prevent or suppress danger to the life, body or health of the Data Owner
- Where it is necessary for carrying out the activities in relation to substantial public interest.

DUTIES AND RESPONSIBILITIES OF PERSONNEL AND CONTRACTOR

All staff and personnel, including all employees and person hired by Company are responsible for complying with the laws and this Personal Data Protection Policy and must keep Personal Data strictly confidential and must not use Personal Data received during working as an employee for any inappropriate personal interest or illegal purpose. Failure to comply with the law may result in an offense and disciplinary action and may also be punished as required by law.

PERSONAL DATA BREACH HANDLING PROCESS

Upon the breach of Personal Data incurred within Company in which the cause of violation affecting the right and freedoms of the Data Subject, employees and personnel shall coordinate to conform with the law. Company is obliged to notify the Data breach to the Personal Data Protection Committee under PDPA without delay and within 72 hours after having become aware of it and to the possible extent. In the event where such Data breach has **a high risk** to the rights and freedoms of the Persons, Company must inform the breach incident and the remedial measures to the data subject without delay.

AMENDMENT OF PERSONAL DATA PROTECTION POLICY

Company may amend or correct this policy from time to time in compliance with the law, new issued law, law amendment or the changing of Company's operation including the suggestion of internal division, which Company shall clearly announce such change to all concerned parties.

CONTACT

Any questions regarding personal data protection or in the event that you would like to exercise your rights request or report personal data breach, please contact us at:

ADDRESS: MAYEKAWA (THAILAND) CO., LTD.

2/3 Moo 14, Bangna Tower, Building A, 4th FL., Bangna-Trad Rd., Bangkaew, Bangplee,

Samutprakarn 10540

TEL: 02-751-9610-17 **FAX**: 02-751-9565-66

EMAIL: pdpa@mth.co.th

WEBSITE: https://mayekawa.co.th/pdpa-policy/

QR CODE:

This Personal Data Protection Policy of Mayekawa (Thailand) Co., Ltd. shall be effective on **August 3, 2022**. by Board of Director's resolution of the Company.

Mayekawa (Thailand) Co., Ltd.