

## GBH Privacy Policy

Siam Global House Public Co., Ltd (“The Company” or “GBH”) respects privacy rights of customers, partners, shareholders, employees, and all related parties. To ensure that personal data of such persons is protected and processed in accordance with applicable personal data protection laws, the Company’s Board of Directors therefore approved this Privacy Policy (“GBH Privacy Policy”) to enable GBH employees and all stakeholders to have clear and appropriate guidelines, mechanisms, governance measures, and management of personal data.

### 1. Principal Scope of application

This privacy policy applies to GBH, employees of GBH, and persons processing personal data by order or on behalf of GBH.

### 2. Definition

- 2.1 **GBH** means the Siam Global House Public Company Limited and its subsidiaries pursuant to the consolidated financial statements of the Siam Global House Public Company Limited.
- 2.2 **Personal data** means any information relating to a natural person whose identity can be identified by reference to such data, directly or indirectly, such as name, surname, email address, telephone number, IP address, pictures, ethnicity, religion, political opinion, genetic information, and biometric data.
- 2.3 **Processing** means any operation(s) made in connection with personal data such as collection, recording, systematization, storage, maintenance, change, recovery, use, disclosure, transfer, dissemination, combination, erasure, or destruction.
- 2.4 **Data subject** means a natural person whose personal data can be used to directly or indirectly identify that person.
- 2.5 **Data controller** means the natural or juristic person who has authority to make decision relating to the processing of personal data.
- 2.6 **Data processor** means a natural or juristic person, who processes personal data by order or on behalf of the data controller.

### 3. Privacy Policy: Personal Data Protection Governance

- 3.1 The Company will establish a personal data protection governance structure to determine appropriate methods and measures to comply with the law as follows:
- (1) Establish an organizational structure with clear roles, missions, and responsibilities of related persons in order to establish mechanisms for governance, control, accountability, operations, enforcement, and monitoring of personal data protection measures, all in accordance with the law and GBH Privacy Policy, and
  - (2) Appoint GBH Data Protection Officer (GBH DPO) with the roles and responsibilities as specified in GBH Privacy Policy.
- 3.2 The Company will establish policies, standards, guidelines, procedures, and other documents related to personal data protection in accordance with the law and GBH Privacy Policy.
- 3.3 The Company will set up a policy management process to ensure continuous compliance with GBH Privacy Policy.
- 3.4 The Company will continuously conduct training for GBH employees to make GBH employees aware of the importance of protecting personal data and ensure that all relevant GBH employees are trained and have knowledge and understanding in protecting personal data and comply with GBH Privacy Policy.

### 4. Privacy Policy: Personal Data Processing

- 4.1 The Company will process personal data, whether as a data controller or a data processor, lawfully, fairly, and transparently and take into account the accuracy of personal data. In this regard, the Company will consider necessity, lawfulness, and GBH's business practices when determining objectives of personal data processing and the time period for retaining personal data. In addition, the Company will maintain adequate confidentiality, accuracy, and security of the personal data.
- 4.2 The Company will establish controlling procedures related to personal data management at every process in accordance with laws and GBH Privacy Policy.
- 4.3 The Company will create and maintain Records of Processing (RoP) for records of programs and activities related to personal data processing in accordance with the law and update the records when there is a change to related programs or activities.

- 4.4 The Company will establish a clear process to ensure that the notification of processing objectives and details of the privacy notices and requests for consent from the data subject are in accordance with the laws. The Company will also provide measures to supervise and monitor compliance with such process.
- 4.5 The Company will establish a mechanism for checking the accuracy of personal data and rectifying personal data.
- 4.6 In the event that the Company sends, transfers, or allows other persons to use personal data, the Company will enter into agreements with such persons to appropriately stipulate rights and obligations of the relevant parties in accordance with the law and GBH Privacy Policy.
- 4.7 The Company will comply with the applicable laws when sending or transferring personal data to recipients located outside Thailand.
- 4.8 The Company will destroy personal data when the time limit expires. The disposal will be made in accordance with the law and GBH business operations.
- 4.9 The Company will assess risks and establish measures to mitigate risks and reduce the impact that may arise as a result of the personal data processing.

## 5. Privacy Policy: Data Subject Rights

The Company will establish measures, channels, and methods allowing data subjects to exercise their rights as permitted by law, and will record and process all response of data subjects.

## 6. Privacy Policy: Personal Data Security

- 6.1 The Company will establish adequate security measures related to personal data including taking steps to prevent the leakage and the unauthorized use of personal data.
- 6.2 The Company will establish a Privacy Incident Management Policy and Incident Response Program in order to identify and handle incidents related to personal data in a timely manner.
- 6.3 The Company will establish notification process to data subjects, state officials, data controllers (in the case that the Company is a data processor or a joint controller) and other parties in accordance with the law.

## 7. Privacy Policy: Compliance

- 7.1 The Company will establish monitoring process related to changes in laws and constantly adjusting personal data protection measures to be always consistent with the law.
- 7.2 The Company will regularly review and improve policies, standards, guidelines, procedures, and other documents relating to personal data protection to keep them at all times up to date and in accordance with the law in effect.

## 8. Roles, and Responsibilities

8.1 The Board of Directors has the following roles and responsibilities:

- (1) Ensure the establishment of personal data protection structure and internal control structure in order to comply with the law and GBH Privacy Policy; and
- (2) Supervise and support GBH to take effective protection of personal data in compliance with the law.

8.2 Privacy Committee

GBH Risk Management Committee acts as the Privacy Committee, with the following roles and responsibilities:

- (1) Establish personal data protection structure, internal control structure, Privacy Incident Management Policy and Incident Response Program in order to be able to identify and deal with incidents related to personal data in a timely manner;
- (2) Assess the efficiency of compliance with GBH's Privacy Policy and report the results to the Board of Directors on a regular basis at least once a year as well as controlling and ensuring that risks related to personal data are properly managed with appropriate risk management guidelines;
- (3) Establish and review standards and guidelines to ensure that GBH operations comply with the law and GBH Privacy Policy; and
- (4) Appoint GBH Personal Data Protection Officer (GBH DPO).

8.3 The management has role and responsibility to follow up and control functions under their supervision to comply with GBH Privacy Policy and to support the awareness promotion among GBH employees.

8.4 GBH Personal Data Protection Officer (GBH DPO) has roles and responsibilities prescribed by applicable laws, including the following roles and responsibilities:

- (1) Regularly report the status of personal data protection to the Privacy Committee and make recommendations to improve GBH's personal data protection to be at all times up to date and in accordance with the law;
- (2) Advise GBH employees to comply with the law and GBH Privacy Policy; and
- (3) Examine operations of GBH to ensure compliance with the law and GBH Privacy Policy.

8.5 GBH employees have the following roles responsibilities:

- (1) Comply with GBH Privacy Policy, standards, guidelines, procedures, and other documents related to personal data protection; and
- (2) Report personal data incidents and non-compliance with the law or GBH Privacy Policy to supervisors.

## 9. Penalty for Noncompliance with GBH Privacy Policy

Failure to comply with this GBH's Privacy Policy may result in an offense and disciplinary action and may also be punished as required by law.

(Mr. Witoon Suriyawanakul)

Chief Executive Officer

Siam Global House Public Company Limited