

Personal Data Protection Policy

Royal Plus Public Company Limited

1. Introduction

Royal Plus Public Company Limited includes those involved in the processing of personal data according to the order or on behalf of Royal Plus Public Company Limited. Hereinafter, all shall be collectively referred to as the **“Company.”** The Company recognizes the importance of personal information and other information about you (collectively called the **“Information”**) in order for you to be confident that the Company is transparent and responsible for collecting, using, or disclosing your information in accordance with the Personal Data Protection Act B.E. 2562 (**“Personal Data Protection Laws”**) and other relevant laws. As a result, this Privacy Policy has been created to inform you about the collection, use, and disclosure of personal information (collectively called, **“Processing”**). The Company, including its officers and related persons acting on behalf of or on behalf of the Company, processes the types of personal data as follows:

2. Scope of Policy Enforcement.

This policy applies to the personal data of individuals who currently have or may have a relationship with the Company in the future. The Company, its officers, business unit contracts, and other types of businesses operated by the Company process personal data. This includes parties or third parties who process personal data on behalf of or on behalf of the Company (**“Personal Data Processor”**) under the Company's products and services, which include websites, systems, applications, documents, and other forms of service maintained by the Company (collectively called the **“Service”**).

Individuals that are related to the Company in accordance with the first paragraph's provisions includes:

- 1) Ordinary person customers
- 2) Officer or worker, employee
- 3) Partners and service providers who are individual persons
- 4) Directors, assignee, representatives, proxies, shareholders, employees or other persons having a similar relationship of a legal entity having a relationship with the Company.
- 5) Users of the Company's products or services
- 6) Visitors or users of the website, www.royalplus.co.th, as well as the systems, applications, devices or other communication channels controlled by the Company.

- 7) Other individuals from whom the Company obtains personal information, such as job candidates, family members of officers, guarantors, beneficiaries of insurance policies, etc.

Articles 1) to 6) collectively referred to as "**You.**"

In addition to this policy, the Company may require that its products or services include a privacy notice ("Notification") for the Company's products or services to inform the subject of personal data, who is a service user, of the personal data being processed, purpose and legitimate grounds for the processing, period of retention of personal information and the right to personal data that a personal data subject may have in a product or service in a specific manner.

In the event of a material conflict between the Privacy Notice and this policy, the Privacy Notice of the service shall prevail.

3. Definitions

- **Personal Data** refers to information on an individual person that enables direct or indirect identification of that individual but does not include information about the deceased in particular.
- **Sensitive Personal Data** means personal data as provided for in Section 26 of the Personal Data Protection Act B.E. 2562 This includes racial, ethnic, political opinions, cult or philosophical beliefs, sexual behavior, criminal history, health data, disability, trade union data, genetic data, biological data, or any other information which affects the owner of personal data in a similar way as announced by the Personal Data Protection Committee.
- **Personal Data Processing** refers to any processing of personal data, such as collecting, recording, copying, organizing, keeping, updating, changing, using, recovering, disclosing, forwarding, disseminating, transferring, merging, deleting, destroying, etc.
- **Personal Data Subject** refers to an individual who is the owner of personal data collected, used, or disclosed by the Company.
- **Personal Data Controller** refers to a person or legal entity who has the authority to make decisions about the collection, use, or disclosure of personal data.
- **Personal Data Processor** refers to an individual or juristic person that collects, uses, or discloses personal data on behalf of the personal data controller. However, the person or juristic person performing the foregoing is not a controller of personal data.

4. Source of Personal Information Collected by the Company

The Company collects or obtains various types of personal information from the following sources:

- 1) Personal data that the Company collects directly from the data subject via various service channels, such as the process of applying, registering, applying for jobs, signing contracts, documenting, completing surveys, or using

products, services, other service channels that the Company supervises or the data received when the subject of personal data communicates with the Company at the office or through other communication channels supervised by the Company, etc.

2) Information gathered by the Company from personal data subject who access the website or use other products or services under the contract or mission, such as tracking the behavior of using the Company's website, product or service by using cookies or from the software on the personal data subject's device, etc.

3) Personal information that the Company obtains from sources other than the personal data owner, provided that such sources have the permission to provide information to the Company on lawful grounds or have gained the approval of the personal data subject, such as linking government agencies' digital services to give comprehensive public benefit services to individuals with personal data, receiving personal data from other government agencies. The Company is obliged by its mission to establish a central information exchange center to support the operation of government agencies in providing digital services to citizens, and the necessity to provide contractual services that involve the exchange of personal data with contractual entities.

Furthermore, this also applies to situations in which you are a third-party personal information provider to the Company. As a result, you are responsible for informing such individuals of this policy's specifics or announcements of new products or services, as applicable, as well as seeking authorization from that individual if disclosure of information to the Company is required.

However, if the personal data subject refuses to provide the information necessary to provide the Company's services, it may result in the Company being unable to provide that service to the personal data subject in whole or in part.

5. Collection of Personal Data

The Company shall collect personal data with the consent of the personal data subject, except in the following circumstances:

1. To carry out the contract in the event that personal data is collected, used, or disclosed for the purpose of providing services or carrying out the contract between the personal data subject and the Company.
2. To avert or eliminate the threat to one's life, body, or health
3. To adhere to the law
4. For the Company's legitimate interests in the event that it is required for the Company's legitimate interests in its operations, the Company will emphasize the rights of the data owner, such as fraud prevention, network security, and the preservation of freedom and the benefit of the data owner.
5. For research studies or statistics, in the case of historical documents or archives for the public benefit or related to research studies or statics, appropriate safeguards have been put in place to protect the data subjects' rights and freedoms.
6. To carry out the state's mission in the event that carrying out the mission in the public interest or performing tasks under the state's powers that the Company has been assigned becomes required.

If the Company is required to collect your personal data for the performance of a contract, the performance of legal obligations, or the necessity of entering into a contract, and you refuse to provide personal data or object to its processing in accordance with the activity's purpose, the Company may be unable to perform or provide all or part of the services you have requested.

6. The Company Collects the Following Types of Personal Data:

The Company will acquire and maintain personal information legally and only to the extent necessary to accomplish the Company's operational objectives, which may include the following:

Types of Personal data	Details and Examples
Personal data	Your information or information that directly identifies you, such as name-surname, date of birth, age, nationality, identification number, signature, position, etc.
Contact information	Information for contacting you such as address, telephone number, e-mail address, username on social networks, etc.
Official document information	Your official document information such as a copy of your ID card, a copy of your house registration, a copy of your passport, etc.
Financial information	Your financial information such as a copy of your bank passbook cover, credit card number, etc.
Information collected by the Company or its automated systems from various devices of the Company.	Information collected by Company or automated systems from Company devices, such as IP Address, Cookie, service behavior, order history, photos, etc.
Sensitive personal data	Your sensitive personal data such as ethnicity, religion information, disability information, criminal history, biometric data (face photo data), health information, etc.

7. Cookie

The Company collects and uses cookies and other similar technologies on websites under its supervision, such as www.royalplus.co.th, on your device for security purposes and to give you, the user, a convenient and positive experience when using the Company's services. This information will be used to enhance the Company's website and make it more useful to you. You may control or eliminate the use of cookies in your web browser's settings (you can find more details in the Cookie Policy of the Company).

8. Purpose of Collecting Personal Information

The Company collects your personal data for a variety of reasons that vary according to the products, services, or activities you use, as well as the nature of your relationship with the Company and the circumstances in each context. The following purposes outline a broad framework for the Company's use of personal data. However, only the purposes related to the products or services you use or are associated with will apply to your information:

1. To enter into a contract or perform a contractual obligation between the Company and the data subject or perform duties under contracts between the Company and third parties for the benefit of the data subject
2. To respond to personal data subjects' inquiries and provide support
3. To develop and enhance the Company's products, commodities, and services in order to better meet the personal data subject's needs
4. To offer information and provide recommendations on products, commodities, services, or public relations in support of marketing campaigns or benefits via contact channels provided by the personal data subject as the information's owner has given consent, or as you have consented to provide information to the Company.
5. To survey opinions, analyze, research, and produce statistical data for marketing purposes or the development and improvement of the Company's operations as you have consented to the Company.
6. For the purpose of managing the Company's internal affairs or conducting operations that are necessary to protect the Company's legitimate interests
 7. To inspect, supervise, and safeguard a building or Company premises
 8. For compliance with applicable regulations governing the Company's operations, such as withholding tax
 9. To provide information to government agencies with legal authority, such as the Royal Thai Police, the Anti-Money Laundering Office, the Revenue Department, and courts
 10. To perform all accounting and financial tasks required by law, including auditing, debt notice and collection, exercising rights to benefits and taxes, and proving transactions required by law
 11. For the legitimate interests of the Company, such as recording through CCTV cameras
 12. To conduct an investigation into and compliance with the Company's laws, regulations, guidelines, and legal obligations
 13. To use the information to verify the identity of the customer.
 14. For other purposes with your express consent

9. Forwarding and Disclosure of Personal Data

The Company will not disclose or forward your personal data to outside agencies unless you expressly authorize or in the following circumstances:

1. To accomplish the purposes outlined in this Privacy Policy, the Company may be required to disclose or share information with our partners, service providers, or other external entities on a need-to-know basis. The Company will enter into a personal data processing agreement as required by law.

2. Personal information may be disclosed or shared with the Company's affiliates. The Company will use the data solely for the reasons specified in this Privacy Policy.
3. Any law or legal process that requires information revelation or disclosure to the government official or competent authority in order to comply with a lawful order or request

10. Transferring or Forwarding Information to Foreign Countries

The Company may forward or transfer personal data overseas. The Company will ensure that the destination country or authority has acceptable privacy protection regulations and practices in place.

11. The Period During Which Your Personal Data is Collected

The Company will keep your personal data only for as long as it is required for the purpose for which it was collected, as specified in the policy, notice, or in line with applicable laws. However, once the period has expired and your personal data is no longer required for the aforementioned objectives, the Company will either delete or anonymize your personal data in accordance with the applicable forms and standards for data deletion. However, in the event of a dispute, the exercise of rights, or a lawsuit involving your personal data, the Company has the right to preserve such information until the dispute is resolved through order or judgment.

12. Personal Data Protection

The Company shall implement and maintain adequate technical and administrative measures to preserve and secure your personal data. Encryption is used to protect data transmitted over the internet and restricts access to your personal information to those directly involved, both in the document and electronically stored data.

13. Connecting to External Websites or Services

The Company's services may contain links to third-party websites or services. Such websites or services may have their own privacy policies that differ substantially from this policy. The Company suggests that you read the privacy statement for that website or service in its entirety prior to using it. The Company is not associated with or responsible for the content, policies, damages, or actions of third-party websites or services, and the Company cannot be held responsible for the content, policies, damages, or actions of third-party websites or services.

14. Personal Data Protection Officer

The Company has appointed a personal data protection officer to monitor, supervise and advise on the collection, use or disclosure of personal information. This involves collaborating and cooperating with the Personal Data Protection Commission's Office in order to ensure compliance with the Personal Data Protection Act B.E. 2562

15. Your Rights Under the Personal Data Protection Act B.E. 2562

You may apply for the following rights in accordance with applicable law and as specified in this announcement:

1. The right to request access and obtain a copy of personal data
2. The right to request that such information be amended to ensure that it is current and accurate.
3. The right to acquire personal data in the event that the Company has converted it to a machine-readable or generally usable format using a device or equipment that operates automatically and is capable of using or disclosing personal data automatically.
4. The right to request deletion or destruction of personal data or to have such data rendered unidentifiable when it is no longer necessary or when the data subject withdraws consent.
5. The right to request a halt to the processing of personal data in the event that such data needs to be erased or is no longer required.
6. The right to withdraw permission to the processing of previously submitted information by the user.
7. The right to object, the owner of the personal data has the right to object at any time to the collection, use, or dissemination of the information.

16. Penalties for Non-compliance with the Privacy Policy

Failure to follow the policy may be considered a violation of the Company's rules (for Company officers or operators) or personal data processing agreements and may result in disciplinary action (for personal data processors) as the case may be and the relationship you have with the Company. They may be subject to penalties as stipulated by the Personal Data Protection Act B.E. 2562, including secondary laws, rules, regulations, and relevant orders.

17. Complaints to Supervisory Authorities

In the event that you find that the Company has not complied with the Personal Data Protection Law, you have the right to file a complaint with the Personal Data Protection Committee or the supervisory authority designated by the Personal Data Protection Committee, or in accordance with the law. However, before lodging such complaints, the Company requests that you contact the Company first so that the Company may ascertain the facts, clarify various issues, and settle your concerns at the earliest opportunity.

18. Amendments of the Privacy Policy

The Company may consider amending or changing this policy as it considers necessary and will notify you of the effective date of any amended version via the website www.royalplus.co.th. However, the Company encourages you to check for the most recent version of the policy frequently via the Company's appropriate channels for the activities it conducts, especially before you disclose personal information to the Company.

Your access to the Company's products or services after the enforcement of the new policy constitutes your acceptance of the terms of the new policy. Please discontinue the use if you disagree with the terms of this policy and contact the Company for clarification.

19. Information About the Data Controller or a Personal Data Protection Officer

If you have any questions about the collection, use, or disclosure of your personal data, you can contact the data controller or the data protection officer (DPO) through the following channels:

1. Email: napharat.p@royalplus.co.th
2. Contact the Company's office (Headquarters) Business hours: Monday - Friday 8.30 a.m.-5.30 p.m.

Office: No. 84/3-7 Rama II Soi 69, Samae Dam Sub-district, Bang Khun Thian District, Bangkok 10150

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