

-Translation-

Privacy Notice for Business Partner

Vanachai Group Public Company Limited and subsidiary (“**companies**”) aim for and respect privacy. We realize the protection of personal data, including personal data security in accordance with the Personal Data Protection Act B.E. 2562 (including the additional revisions) and all other specific related laws (“**Personal Data Protection Laws**”).

Companies would like to make an announcement on personal data protection policy (“**policy**”) in this document. The purpose is to inform you (as business partner; current, past and any future) on details of your personal data protection and your personal data security management. This also includes employees, officers, delegates, representatives, juristic deputies, directors, visitors, any persons who act on behalf of legal entity who is the business partner of the companies, witnesses, and any concern persons – therefore, you can ensure that personal data which companies collect, use or disclose (all are called “**process**” or “**processing**”) is protected and complies with law of personal data protection.

1. Definitions

“**Subsidiaries**” mean companies which are listed below;

1. Particle Planner Company Limited
2. Vanachai Panel Industries Company Limited
3. Vanachai Chemical Industries Company Limited
4. Woodtek International Company Limited
5. PV Wood Company Limited
6. Vanachai Energy Industries Company Limited
7. Vanachai Woodsmith Company Limited
8. Vanachai Logistics Company Limited
9. Vanachai Logistics Enterprise Company Limited

“**Personal Data**” means data of individual who can be identified both direct or indirect, however, data of deceased person is not particularly included.

“Sensitive Personal Data” means information of race, ethnicity, politics opinion, cult believe, religion or philosophy, sex behavior, criminal record, health information, disability, labor union information, genetic information, biological information, or any other information which affects the data owner in a similar way announced by Personal Data Protection Committee.

2. Personal Data which companies will collect, use or disclose

Your personal data which we collect, use or disclose (includes but not simply limits to personal data) can be categorized as follows;

- 1) **Personal information** ex. name, last name, date of birth, identification number, passport number, Tax Identification number, Professional license number
- 2) **Contact information** ex. phone number, address, email, workplace, social media contact through Facebook, Line, Whatapp, etc.
- 3) **Official document Information** ex. copies of identification card, passport, permit.
- 4) **Financial information** ex. bank account number, copy of bank account book.
- 5) **Information of commodity trading** ex. history of commodity trading, history of product claim, payment information, after sales service history, return history, complaint, payment history.
- 6) **Information of education and work** ex. education history, professional qualification, social security information, past employment information, work duration, resume/cv, work history.
- 7) **Other personal information** ex. video recording from CCTV, vehicle license plate, photo, conversation record, technical data; ex. website access information, information from cookies, or any other similar technologies.

Companies collect, use or disclose your personal data which could be sensitive ex. medical certification, information on copy of identification (ex. religion and blood type) that companies have obtained your clarity consent or have requirement by law to administrate.

3. Source of personal data

- 3.1 Companies collect your personal data which you have directly given your personal data to companies in verbal or through our purchasing channels of goods or services, exchanging name cards, applicant filing, and providing your information through any electronic channels, etc.
- 3.2 Companies collect your personal data from other sources, your workplace, public information, social media, internet searching, or advice from reference person/ person who recommends you to our companies, etc.

4. Purpose of personal data process

Companies process your personal data which companies collect are for the following purposes;

- 4.1 For being complied with our contract as you are our counterparty, or for being used for processing on your request before signing any contracts; ex. purchasing assessment, qualification assessment for procurement, assessment before contract agreement, assessment or contract agreement, quotation, auction, assessment for procurement selection, communication of commodity trading, contract execution or contractual obligation, process of payment collection or product payment, product fee, service fee or other fees, product delivery or product arrival, process of insurance, etc.
- 4.2 For legitimate interests; ex. procurement, hiring, assessment and work contract measurement, assessment/ work confirmation, accuracy assessment or product quality or service quality, verification and validation of identity concerning transaction or legal contract, product management and product development, investigation/ search/ examination/ consultation concerning to form rights by law or to verify the process by law which your personal data could be disclosed to lawyer/ tax law consultant/ auditor/ any other consultants for the aforementioned purposes, disclosure to external service provider for accounting/ finance/ and information technology, video recording from CCTV for the security in the buildings or surrounding.

- 4.3 For being complied with relevant laws ex. any administrations on accounting and finance ex. audit, notification and debt collection, tax invoice, collection and record of accounting and tax, withholding tax, and any evidences of transaction by law, personal data by law, disclosure or data transmission by law to government agency, practice by act of law, regulations, court summon, and/ or the order of competent officer, payment of legal fee/ etc.
- 4.4 Companies process your sensitive personal data categories on necessity which complies with relevant laws in order to achieve the purpose of contract agreement; ex. collecting health data on medical certificate to be reviewed on qualification before signing contract as required by law, etc.

When companies need to process your sensitive personal data ex. using copy of identification (may show sensitive personal information ex. race, religious, blood type) in order to verify yourself or in order to process tax, these matters will be in process only when we have clarity consent from you or for other purposes as required by law.

5. Disclosure of your personal data

- 5.1 Companies will not disclose personal data to other parties unless having consent. However, companies can do so without obtaining any consents when needing to disclose/ report your personal data to other parties under law authorization or having to take action in order to comply with the law. This also includes needing to submit data to any government agencies such as Revenue Department, Industrial Estate Authority of Thailand, Department of Industrial Works, Council of Engineers for any further actions by law. Data will also be disclosed when receiving orders, court summon or any official letters to take any actions by virtue of law of that government agency.
- 5.2 Companies may need to disclose your personal data to group companies of Vanachai Group and to the third parties who involved in the aforementioned purposes. This also includes partner, business partner, service provider, service recipient, and personal data processor. Personal data processor is appointed by companies in order to be responsible for and to provide services/to administrate personal data; ex. development or security maintenance of work and information technology systems, payment system, audit, or any other services which may give you benefits, any third parties to audit/ legal advice/ process prosecution, and any other actions which are in necessity to company business. Hence, companies will administrate to ensure that

those persons will process your personal data according to personal data protection policy and relevant law.

- 5.3 In the event that companies submit or transfer your personal data to other countries, companies will administrate to ensure that the transaction is submitted or data is transferred to the destination country, international organization or appropriate safeguards. In some cases, companies may ask for your permission to transfer personal data to other countries as required by law subjected to personal data protection.

6. Storage, duration and security standard

- 6.1 Companies keep only your personal important data in order to achieve the purpose which has been explained in this document by considering retention period of your personal data being appropriate and consistent with contractual period, accounting standard, ISO standard; Standard of Industrial Estate Authority of Thailand, legal period, and the necessity to further store your personal data for compulsory duration to comply with the law; these are to establish legal rights or to use legal rights, or to use rights by law. Hence, companies will continue to retain your personal data at least for 5 years after our contract between you and our companies have expired or for a proper time duration for the purposes stated in this policy.
- 6.2 Companies arrange monitoring system in order to erase or destroy personal data when exceeding storage duration/ not relating/ exceeding the purpose needs of collecting personal data of individual.
- 6.3 Companies define measures to secure personal data in appropriation by securing data in document, electronic system, computer system or any other devices by operating in accordance with prominent standard. These will ensure you that personal data security system of companies protect the prevention of loss, access, use, adjustment, modification, or disclosure on personal data which is unlawful or is processed for any activities without lawful authority.
- 6.4 Companies limit access and use of technology for your personal data security in order to prevent any attacks or any accesses into companies' computer systems or electronic systems without any permissions – this also includes when your personal data is disclosed to any third parties (in order to process your personal data) or to any personal data processors, you can ensure that companies will supervise those parties to appropriately operate your personal data in accordance with companies' instructions.

7. Your rights as the data object

7.1 Under the personal data protection law, your rights are as follows;

- 1) Rights to request for or to acquire the copy of your personal data which companies collect, use or disclose.
- 2) Rights to acquire or transfer your data when the data is in readable format or in automatically use in overall from devices or work appliances. Those devices or work appliances can also be used or be disclosed on personal data automatically. The rights also includes requesting, on your intention, transferring data to any third parties (companies have reserved rights to appropriately collect fees on the actual expenses which will be specified) except that technology condition is not able to do. This is as required by the law on personal data protection.
- 3) Rights to oppose to collect, use or disclose personal data which is specified by law.
- 4) Rights to request for deleting or destroying or making your personal data to become anonymous in any method which is subjected by law.
- 5) Rights to restrict your personal data, unless there are any legal restrictions which the companies are unable to process your request.
- 6) Rights to withdrawn consent given at any time, unless the withdrawal of consent has restriction by law or contract. Therefore, your withdrawal of consent will not affect the process of your personal data which has previously given subjected by law.
- 7) Rights to file a complaint submitted to an authority who empowers by law of personal data protection when companies do not comply with law.

7.2 Companies process with proficiency in collecting personal data with accuracy and in current – this is in order to have comprehensive data and not to generate any misunderstanding. Hence, when you have any changes or when you notice any incorrect information provided by the company, you have rights to request for right to rectification on your personal data.

7.3 To use your rights, specified as above, must be by law. Companies may refuse your above rights subjected to your rights restrictions even you are the data object by law. In case the companies refuse to process your request of rights, the companies will record your request with reasons in personal data processing subjected by law.

7.4 To submit a request to use your rights, you can contact companies through contact channels which identified in policy of this document. The company will review and inform consideration within 30

days starting from the request date to use your rights. In case the companies refuse your request to use your rights, the companies will also inform reasons of rejection to use your rights.

8. Revision of personal data protection policy

Companies may occasionally review, amend, adjust policy of this document in order to comply with practices, laws, rules and related regulations. Therefore, if there are any amendments on policies of this document, the companies will urgently publish policy revision through the channels specified by the companies. And you can review and proceed acceptance through electronic practice or by any other practices. And if you have already made an acceptance, that revision will also then be part of this document policy.

If you have any enquiries concerning this privacy announcement or want to request for your rights as specified in this privacy announcement, please kindly use the contact form of companies websites: <https://www.vanachai.com/storage/document/data-privacy-protection/rights-execution-form-en.pdf>. In addition, you can still contact companies through Data Protection Officer of the companies by using the following contact details;

Sincerely,

Vanachai Group Public Company Limited and Subsidiaries

Date of Notice Enforcement on 05 July 2022

Details of Data Controllers

Data Controllers	Contact
Vanachai Group Public Company Limited	2/1 Wongsawang Road, Bangsue, Bangkok 10800 Tel: +66 (0) 2 585 4900-3, +66 (0) 2 913 2180-9 Email: dpo@vanachai.com

List of Subsidiaries

Data Controllers	Contact
1. Particle Planner Company Limited	2/1 Wongsawang Road, Bangsue, Bangkok 10800 Tel: +66 (0) 2 585 4900-3, +66 (0) 2 913 2180-9 Email: dpo@vanachai.com
2. Vanachai Panel Industries Company Limited	
3. Vanachai Chemical Industries Company Limited	
4. Woodtek International Company Limited	
5. PV Wood Company Limited	
6. Vanachai Energy Industries Company Limited	
7. Vanachai Woodsmith Company Limited	
8. Vanachai Logistics Company Limited	
9. Vanachai Logistics Enterprise Company Limited	

Details of Data Protection Officer (DPO)

Address: 2/1 Wongsawang Road, Bangsue, Bangkok 10800

Telephone: +66 (0) 2 913 2180-9 ext. 703

Fax: +66 (0) 2 587 9556

Email: dpo@vanachai.com