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Privacy Notice for Shareholder

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 shareholder) – 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 subject 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, title.
- 2) **Contact information** ex. address, phone number, email.
- 3) **Information on official document** ex. copy of identification, copy of house registration.
- 4) **Information financial and investment** ex. bank account number, shareholder identification number, share certificate number, share number, number of shares, etc.
- 5) **Other information** ex. video recording from CCTV, photo or video recording at the meeting, conversation record from any meetings.

Companies collect, use or disclose your personal data which could be sensitive such as information on copy of identification (ex. religion and blood type).

3. Source of personal data

Companies may collect your personal data which you have directly given your personal information to companies or may receive your personal information from other sources ex. stock broker, company, Securities Depository (Thailand) Company Limited, 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. communication, qualification verification and identity, registration to participate shareholder meeting, vote, closing of shareholder register, company management, administration of rights and duty of shareholder, procedure of disbursement and payment of dividend, preparation of invitation letter for shareholder meeting, etc.
- 4.2) For legitimate interests, ex. verification and identity of shareholder or proxy in participating meeting, risk management and assessment supervision, data transmission or any other information for your benefits, protection and assessment of any processes which are fraud, money laundering, criminal act or any other actions which against law, video recording from CCTV or identification card arrangement to enter building for the security of people and assets, etc.

- 4.3) For being complied with relevant law ex. shareholder meeting administration, committee meeting, video recording at the meeting, registration record and meeting report, document submission and any other practices as required by law on public company limited, disclosure to Securities Depository (Thailand) Company Limited and other government agencies by law ex. Office of the Securities and Exchange Commission of Thailand, Department of Business Development, Legal Execution Department, Revenue Department and other concerned departments, order, court summon or official letter for any actions by virtue of law of that official agency, etc.

Companies will process your sensitive personal data only when having your clarity consent ex. using copy of identification card (which may appear sensitive personal data ex. religious, blood type) in order to verify your identity.

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 submitting data to ex. Securities Depository (Thailand) Company Limited and other official agencies ex. Office of the Securities and Exchange Commission of Thailand, The Stock Exchange of Thailand, Department of Business Development, Legal Execution Department, Revenue Department for further process required by law, declaring data when receiving order/ court summon/ or official letter for any actions by virtue of law of that official agency, etc.
- 5.2 Companies may need to disclose your personal data to group companies of Vanachai Group and to third parties who involved in according to the aforementioned purposes. This also includes partners, business alliances, service providers, service recipients, and personal data processor. Personal data processor is delegated 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 or any other services which may give you benefits, audit administration/ consult on legal/ prosecution process, training, seminar, and any other actions which are in necessity for 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.

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, 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. Therefore, companies will continue to keep your personal data at least for 10 years after you are out of being shareholder of companies 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 owner of personal data

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 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 data provided by the company, you have rights to request for amendment and adjustment 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 subject 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