

## Privacy Notice

### For Customers, Vendors and Business Partners

P.S.P. Specialties Public Company Limited and its subsidiaries (the "**Company**") place great importance on protecting the personal data of customers, partners, and business affiliates (collectively referred to as "**you**"). To ensure that your personal data is protected in accordance with the Personal Data Protection Law, the Company has established this Privacy Notice to inform you of the details related to the collection, use, and/or disclosure (collectively referred to as "**Processing**") of your personal data, as well as your rights under the law as the data subject. The details are as follows:

#### 1. The types of individuals from whom the company collects personal data:

Under this Privacy Notice, the company collects the following personal data:

**1.1 Customers** refer to individuals who purchase or buy goods and/or services from the company, or other individuals who inquire about the company's goods and/or services. It also includes individuals who become aware of the company's goods and/or services through various media and those who receive advertising or public relations information about the company's goods and/or services. This also includes individuals associated with or representing the legal entity that is a customer, such as executives, directors, employees, workers, agents, representatives, or any other individuals, as well as those whose personal information appears in documents related to transactions between the company and that legal entity, such as coordinators,



purchasers, recipients of goods, check signatories, etc., including individuals whose information has been provided by the legal entity to the company.

**1.2 Vendors** refer to individuals who sell or provide goods and/or services to the company, regardless of whether they are registered as a partner with the company or not, such as contracting parties, service providers, consultants, etc. This also includes individuals associated with or representing the legal entity that is a business partner, such as executives, directors, employees, workers, agents, representatives, or any other individuals, as well as those whose personal information appears in documents related to transactions between the company and that legal entity, such as coordinators, delivery personnel, check signatories, etc., including individuals whose information has been provided by that legal entity to the company.

**1.3 Business Partner** refer to individuals other than customers or vendors, who have a relationship related to business operations, such as prospective investors or joint investors, individuals interested in participating in business projects or participants in business projects, agents or brokers in procuring goods or services for the company. This also includes individuals associated with or representing such legal entities, such as executives, directors, employees, agents, representatives, or any other individuals, as well as those whose personal information appears in documents related to transactions between the company and that legal entity.



## 2. Objective of Collection, Use, and/or Disclosure

2.1 Generally, whether you are a customer, business partner, or business affiliate, the company may process your information for the following purposes based on legal grounds:

No.	Objective	Legal Basis
2.1.1	<b>For the purpose of coordination related to the company's business operations.</b>	Legitimate Interest
2.1.2	<b>For the purpose of public relations and dissemination through various channels</b> , such as internal group emails, the company's website, Facebook, LINE, YouTube, or other media like television, print, etc.	Legitimate Interest
2.1.3	<b>For the purpose of business planning, reporting, and forecasting, risk management, governance, and auditing</b> , including internal audits by the internal audit department, as well as internal management within the organization, and for use in the company's operations related to the disbursement of funds by the company's accounting and finance department.	Legitimate Interest
2.1.4	<b>For the purpose of conducting KYC (Know Your Customer) and/or Due Diligence related to the company's operations, including business status checks or other forms of background checks, to assess suitability or evaluate risks before deciding to enter into transactions together, identity</b>	Legitimate Interest



No.	Objective	Legal Basis
	<b>verification, authorization, and delegation of authority for signing any agreements or contracts with the company.</b>	
2.1.5	<b>For the purpose of carrying out actions related to the transfer of rights, obligations, and benefits, such as mergers, demergers, business transfers, or any actions conducted in accordance with the law.</b>	Legitimate Interest
2.1.6	<b>For the purpose of maintaining a database of the company's stakeholders and/or using the information to manage relationships or coordinate activities related to the company.</b>	Legitimate Interest
2.1.7	<b>For the purpose of disclosing necessary information to comply with the evaluation criteria of various assessments the company participates in.</b>	Legitimate Interest
2.1.8	<b>For the purpose of investigating and inquiring into internal complaints, preventing fraud, or conducting other legal processes, including reviewing and managing complaints and allegations related to the company's operations or individuals involved, to ensure transparency and fairness for all parties.</b>	Legitimate Interest



No.	Objective	Legal Basis
2.1.9	<b>For participation in various projects or activities of the company</b> , such as business visits, donations, seminars, training programs, or other projects organized by the company or in collaboration with external parties or government agencies, including any activities related to participating in such events, managing your health and safety, as well as evaluating, analyzing, and improving the execution of the company's projects or activities.	Legitimate Interest
2.1.10	<b>For the purpose of ensuring security within the company's building or premises, access card exchange, recording entry and exit data, as well as recording images inside the building or premises using CCTV cameras.</b>	Legitimate Interest
2.1.12	<b>For the establishment of legal claims, authorization and delegation of authority, compliance with or exercising legal claims, defending against legal claims, and conducting legal proceedings, as well as actions to enforce legal judgments.</b>	Legal Obligation Legitimate Interest
2.1.13	<b>For compliance with laws related to public health benefits</b> , such as the prevention of health risks from infectious diseases or epidemics that may spread or enter the Kingdom.	Legal Obligation
2.1.14	<b>For the purpose of complying with laws related to public health benefits</b> , such as the prevention of health risks from	Legal Obligation



No.	Objective	Legal Basis
	infectious diseases or epidemics that may spread or enter the Kingdom.	
2.1.15	<b>For the management of your health and safety.</b>	Vital Interest

In addition to the purposes mentioned above, the company may process your personal information further in the following cases:

**2.2 In the case that you are a customer;** the company may process your personal information for additional purposes as follows:

No.	Objective	Legal Basis
2.2.1	<b>For the purpose of considering and approving requests to purchase goods and/or receive services,</b> including the processes of identity verification, authorization and delegation of authority, risk assessment for related transactions, and carrying out various internal procedures of the company for contract execution, contract performance, product delivery, service provision, as well as coordination, billing, and delivery of related documents, etc.	Contract Legitimate Interest
2.2.2	<b>For the purpose of evaluating, improving, and developing the company's products, services, and promotional items,</b> including surveying customer satisfaction regarding the company's products and/or services.	Legitimate Interest



No.	Objective	Legal Basis
2.2.3	<b>For use as information and supporting documents in dealings with banks, financial institutions, the Department of Business Development, the Revenue Department, the Excise Department, the Stock Exchange of Thailand, the Securities and Exchange Commission, and other relevant external agencies.</b>	Legitimate Interest

**2.3 In the case that you are a vendor;** the company may process your personal information for additional purposes as follows

No.	Objective	Legal Basis
2.3.1	<b>For carrying out various processes before entering into a contract, such as:</b> <ul style="list-style-type: none"> <li>▪ Registering business partners.</li> <li>▪ Assessing the qualifications of business partners.</li> <li>▪ Preparing information prior to entering the procurement process.</li> <li>▪ Receiving bids, attending clarification sessions, presenting work related to procurement, price negotiations, and announcing results.</li> <li>▪ Inviting bids, submitting bids, verifying authority, authorization and delegation of authority for submitting bid documents by bidders, and evaluating the qualifications of bidders according to the</li> </ul>	Contract  Legitimate Interest



No.	Objective	Legal Basis
	company's procurement process, including cases where the bidder is a service provider, consultant, auditor, or financial institution.	
2.3.2	<p><b>For the purposes necessary to carry out transactions between business partners and the company, such as:</b></p> <ul style="list-style-type: none"> <li>▪ Identity verification, authorization, and delegation of authority, as well as using them as evidence for related transactions.</li> <li>▪ Consideration, drafting, and signing of commercial contracts.</li> <li>▪ Compliance with employment contracts, service contracts, other commercial agreements, and arrangements or collaborations between the company and its counterparties, including the process of requesting and reviewing documents that may contain personal data of company directors who are external parties or representatives from government agencies.</li> <li>▪ Acceptance of work under contracts between the company and its business partners.</li> </ul>	<p>Contract</p> <p>Legitimate Interest</p>
2.3.3	<p><b>For the purpose of complying with laws related to transactions between business partners and the company, such as tax laws and securities and exchange laws.</b></p>	<p>Legal Obligation</p>



**2.4 In the case that you are a business partner;** the company may process your personal information for additional purposes as follows:

No.	Objective	Legal Basis
2.4.1	<b>For business communication purposes</b> , such as contacting, scheduling meetings, attending meetings, and engaging in business discussions regarding the company's products and/or services, as well as projects related to the company or its affiliates, including recording details about such communications.	Legitimate Interest
2.4.2	<b>For the purpose of verifying qualifications or assessing risks and suitability before deciding to enter into a transaction</b> , identity verification, authorization and delegation of authority for signing any agreements or contracts with the company, business status checks, or other forms of background checks.	Legitimate Interest
2.4.3	<b>For the purpose of considering, drafting, and signing various contracts or agreements related to the matter, including the management of such contracts or agreements.</b>	Contract
2.4.4	<b>For the purpose of considering requests to participate in the company's projects or projects that the company is involved in with external parties or government agencies, and carrying out related activities pertaining to such projects.</b>	Legitimate Interest



In cases where the personal information collected by the company is necessary for the performance of a contract or to comply with applicable laws, if you do not provide the required personal information, the company may not be able to proceed with the transaction or manage the contract with you (as the case may be).

Additionally, if you provide the personal information of other individuals to the company, you are responsible for informing those individuals about this Personal Data Processing Notice and/or obtaining their consent (if necessary).

### **3. Personal Data Collected by the Company**

The company will collect your personal information by directly requesting or inquiring from you. However, there may be certain cases where the company collects your personal information from other sources, such as your employer or affiliated organization, your employees, secretaries, or coordinators, government agencies or public authorities, or other publicly available sources, such as websites or publicly accessible internet data.

The company collects the following types of personal information:

#### **3.1 General Personal Information**

- (1) **Identity Data:** Information used to identify you, such as your name, surname, ID card number, tax ID number, nationality, signature, and photograph.
- (2) **Contact Data:** Contact details such as address, phone number, fax number, email, Line ID, company/organization name, and business card details.
- (3) **Financial Data:** Financial information such as details of payment/receiving accounts, bank account book copy (front page), personal details appearing on invoices, tax invoices, and receipts.



- (4) **Customer/Partner Registration Data:** Documents used as evidence for registering as a customer or business partner, or for various activities, such as copies of ID cards, passports, household registration, name change certificates, office location maps, power of attorney, employment certificates, educational qualifications, company certification letters, tax certificates (Por. Phor. 20), and financial statements.
- (5) **Communication Data:** Information related to your communication with the company, such as dates, times, and locations of contact, as well as any recorded images or audio during communications.
- (6) **CCTV Data:** Video/audio recordings from security cameras or CCTV systems.
- (7) **Feedback Data:** Opinions, suggestions, or complaints.
- (8) **Electronic System Usage Data:** Information about your use of the company's electronic systems, such as traffic data on computers (logs), website visit history, and IP address data.

### 3.2 Sensitive Personal Information

The company does not intend to collect or use data related to your religion or blood type as stated on your ID card for any specific purpose. If the company receives a copy of your ID card, please ensure that such information is concealed. If you fail to conceal this information, the company will assume that you consent to the company taking action to conceal this data. Any document with concealed information will be considered legally binding.

In cases where the company needs to collect sensitive personal information, explicit consent will be requested from you on a case-by-case basis, unless otherwise required by law.



#### **4. Retention Period of Personal Data**

The company will retain your personal information for as long as necessary to fulfill the purposes for which the personal data was collected, used, or disclosed as outlined in this notice. The criteria used to determine the retention period include the duration for which the company needs to use your personal information for the stated purposes. The company will retain your personal information for a maximum period of 10 years from the date the legal relationship between you and the company ends. However.

#### **5. Disclosure of Personal Data**

In order to fulfill the objectives stated in this notice, the company may disclose your personal information to the following individuals or organizations:

- 5.1 Internal departments within the company, including executives, directors, employees, staff, or relevant personnel, as necessary for processing your personal information.
- 5.2 Government agencies, regulatory bodies, or other entities as required by law, including authorities exercising legal power such as courts, the Royal Thai Police, the Department of Business Development, Ministry of Commerce, the Revenue Department, etc.
- 5.3 Representatives, business partners, contractors/subcontractors, and/or service providers for any operations conducted by the company, such as auditors, lawyers, company consultants, transport service providers, event organizers, banks, or financial institutions
- 5.4 The company's contractual partners with whom you communicate or are involved in relation to your duties or position, or others with a similar relationship, in cases where necessary for contract performance, joint projects, or business operations.
- 5.5 Certification bodies for management system standards.



5.6 Any other individuals or organizations to whom you have given consent for disclosing your personal information.

## **6. Rights of the Data Subject**

The data subject has the rights under the Personal Data Protection Act B.E. 2562 (2019) and is entitled to exercise the following rights:

### **5.1 Right to be Informed**

When personal data is collected from you or obtained from other sources, you have the right to be informed of the purpose for the collection, use, and/or disclosure of your personal data, as well as your rights regarding that personal data.

### **5.2 Right to Withdraw Consent**

If the Company relies on your consent to process your personal data, you have the right to withdraw that consent at any time, unless the withdrawal of consent is restricted by law or a contract that benefits you. The withdrawal of consent will not affect the lawfulness of any processing activities that were carried out prior to the withdrawal.

### **5.3 Right of Access**

You have the right to request access to and obtain copies of your personal data held by the Company, as well as request information on how such data was obtained if you did not provide it directly to the Company.

### **5.4 Right to Data Portability**

You have the right to request the Company to transfer your personal data to another data controller as prescribed by law.



### **5.5 Right to Object to Processing**

You have the right to object to the processing (collection, use, disclosure) of your personal data as stipulated by law.

### **5.6 Right to Erasure or Destruction**

You have the right to request that the Company delete, destroy, or anonymize your personal data as prescribed by law.

### **5.7 Right to Restriction of Processing**

You have the right to request the Company to restrict the use of your personal data as required by applicable laws.

### **5.8 Right to Rectification**

You have the right to request that the Company correct your personal data to ensure it is accurate, up-to-date, complete, and not misleading.

### **5.9 Right to Lodge a Complaint**

You have the right to file a complaint with the relevant legal authority if you believe that the collection, use, and/or disclosure of your personal data violates or fails to comply with the law.

The Company reserves the right to evaluate your request and take action in accordance with the Personal Data Protection Act.



## **7. Transfer or Disclosure of Data Abroad**

The Company does not disclose your personal data to foreign countries. However, the Company may store your data on servers or cloud services provided by third parties located outside of Thailand and may process the data using software or applications from overseas providers. In any case of transferring or transmitting data abroad, the Company will comply with the Personal Data Protection Act B.E. 2562 (2019).

## **8. Personal Data Security Measure**

The Company implements appropriate security measures to protect your personal data from loss, unauthorized access, destruction, use, alteration, or disclosure. These measures are in line with the Company's privacy policy, which is communicated to all personnel within the organization. Additionally, the Company has established guidelines for ensuring the proper security of personal data processing and preventing personal data breaches. All executives, employees, contractors, agents, consultants, and those receiving information from the Company are required to maintain confidentiality in accordance with the Company's confidentiality measures.

## **9. Changes to the Privacy Notice**

In the event of any revisions or changes to this notice, the company may consider making amendments as deemed appropriate and will inform you through suitable channels, such as the company's website and/or via email.



## 10. Contact Information

If you have any questions or would like to inquire further about the protection of your personal data, the collection, use, or disclosure of your data, or if you wish to exercise your rights or have any complaints, you can contact the Company through the following channels:

### **Chairman of Personal Data Protection Working Team**

P.S.P. Specialties Public Company Limited

Address : 1 Boromrachachonanee Rd., Arun-Amarin, Bangkoknoi, Bangkok, 10700, Thailand.

Tel: 034-820519

Email : [privacy@psp.co.th](mailto:privacy@psp.co.th)

