

TRR 35 Holding (Thailand) Company Limited
Privacy Policy for Company's Business Operations

TRR 35 Holding (Thailand) Company Limited (**the “Company”**) has established and published this Privacy Policy to explain how the Company collects, uses or discloses the Personal Data of business partners, clients, and other third persons, including directors, representatives, attorneys-in-fact, or work operators on behalf of the mentioned persons or entities, including how the Company protects the Personal Data and handles such Personal Data via appropriate channels or approaches according to the Personal Data Protection Act B.E. 2562 (2019).

The Company regularly reviews and, if appropriate, updates this Privacy Notice from time to time to ensure that the Data Subjects' Personal Data is properly protected. In case of any significant update to this Privacy Notice, the Company will inform the Data Subjects via appropriate channel(s).

1. Definition

“Personal Data” means any information relating to an individual, which enables the identification of such individual, whether directly or indirectly, but not including the information of the deceased persons in particular.

“Sensitive Personal Data” means any Personal Data stated under Section 26 of the Personal Data Protection Act B.E. 2562 (2019) which requires highly special care in collecting and processing, i.e. race, ethnic origin, political opinion, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which affect the Data Subject in the same manner, as prescribed by the Personal Data Protection Committee.

“Data Subject” or **“Data Subjects”** means natural persons who are data subjects whose Personal Data have been collected, used or disclosed by the Company.

2. Purposes of collection, use or disclosure of Personal Data

2.1 Lawful basis for collection, use and disclosure of Personal Data

In general, the Company only processes the Personal Data as it is necessary for the scope set out in this Privacy Policy as follows:

2.1.1 For general Personal Data

- Where the Company obtains consent from the Data Subject as required by law;
- To prevent or suppress a danger to a person's life, body or health;
- Where it is necessary for performing contractual obligations to which the Data Subject is a party or taking steps at the Data Subject's request prior to entering into a contract;
- Where it is necessary for legitimate interests of the Company or any other persons or juristic persons, except where such interests are overridden by fundamental rights of the Data Subject's Personal Data;
- To comply with laws to which the Company is subjected.

2.1.2 For Sensitive Personal Data

During any operations of the Company, the Company may need to collect the Data Subject's Sensitive Personal Data. In the case where the Company collects Sensitive Personal Data, the Company shall always obtain explicit consent from the Data Subjects, unless the explicit consent is not required by the Personal Data Protection Act B.E. 2562 (2019). For example:

- To prevent or suppress a danger to a person's life, body or health, where the Data Subject is incapable of giving consent by whatever reason;
- It is information that is disclosed to the public with the explicit consent of the Data Subject;

- It is necessary for the establishment, compliance, exercise or defense of legal claims.
- It is necessary for compliance with a law to achieve the purposes with respect to public interest in public health such as protecting against cross-border dangerous contagious diseases or epidemics which may be contagious or pestilent.

2.2 Purposes of collection for use or disclosure of Personal Data

The Company collects the Data Subjects' Personal Data for various purposes depending on relationship between the Data Subjects and the Company as follows:

2.2.1 Purposes for business partners including the family members, reference persons, and emergency contact persons of the aforementioned persons

- 1) For examination of qualifications and selection of business partners, as well as consideration and approval of entering into relevant purchase orders and contracts where the Data Subject is a direct contracting party or is a director, representative, attorney-in-fact, or work operator on behalf of the mentioned parties;
- 2) For conducting the registration process of business partners, preparing the relevant juristic acts and contracts, examining the validity of contracts, exercising rights and duties according to the contracts, checking and accepting commodities and raw materials according to the contracts, payments, reimbursements of relevant expenses as well as preparing and submitting evidence of payments and reimbursement of relevant expenses, contract administration, amendment of contracts, issuing written notice for termination of contracts as well as terminating the contracts for the juristic acts and contracts relevant to business partners and the Company;
- 3) In order to comply with the relevant laws, regulations, and rules pertaining to the Company's business operations such as request for license acquisition and request for license extension to the relevant entities and

sending electricity plant performance test results and relevant reports to government authorities as prescribed by law, etc.;

- 4) For preparing database for the purpose regarding liaison for shipping commodities as ordered by the clients and other relevant cases;
- 5) In order to comply with the measures regarding prevention of infection of diseases and epidemics prior to entering the clients' buildings and premises, to examine driver's licenses of business partners' work operators for shipping commodities to the clients, and sending information relevant to the Company's business operation to the external entities; and
- 6) For the Company's internal administration such as preparing the assets database, preparing reports used to analyze the Company's work operations, and receipt and submission of relevant information and documents, etc.

2.2.2 Purposes for clients including the family members, reference persons, and emergency contact persons of the aforementioned persons

- 1) For registering new clients, preparing juristic acts and contracts of sale of commodities both domestically and overseas as well as contracts of sale of electricity, including other relevant documents and contracts, examining the validity of the contracts, exercising rights and duties according to the contracts, amending contracts, issuing written notice for termination of contracts as well as terminating the contracts for the juristic acts and contracts relevant to business partners and the Company;
- 2) For the Company's work operations under relevant laws, preparing database for the purpose of liaising and work operations according to sales of commodities and other relevant contracts such as shipping commodities as ordered by clients, receipt and submission of relevant clients' information and documents via mails;
- 3) For examination and management of complaints received from clients regarding the Company's commodities, as well as liaison, enhancement of

operation and other necessary operations in order to settle the mentioned complaints;

- 4) For receipt of payments and other relevant operations such as issuing invoices, etc.;
- 5) For analyzing clients' information, grouping clients, performing marketing strategies via several approaches, as well as conducting satisfaction surveys in the Company's commodities;
- 6) For presenting sales promotion activities and doing direct markets for sales of the Company's commodities; and
- 7) For purpose of making building entry cards, parking membership cards, managing membership statuses, and maintaining security in the Company's buildings.

2.2.3 Purposes for researches

- 1) For promoting researches for enhancement of the Company's qualities of products, as well as referencing researchers, keeping researchers' records, liaising, examining and accepting researches, and performing payments to working researchers.

2.2.4 Purposes for other relevant cases

- 1) For consideration of qualifications and entering into contract (including procedures regarding consideration and examination of contracts), exercising rights and duties according to contracts, amending contracts, as well as terminating the contracts for other contracts besides the aforementioned contracts such as agreements of lease and service of spaces of the Company to conduct businesses regarding lease of buildings, parking areas, and eateries, agreements of employment of training lecturers or entities or institutes to educate the Company;
- 2) For the Company's work operations under laws, regulations, and other relevant rules as well as to comply with the laws, reporting information, and perform other operations in connection with government authorities

such as preparing reports for submission to Department of Skill Development, preparing written request to seek courtesy to relevant government authorities, preparing electrical energy reports for submission to Office of the Energy Regulatory Commission, etc.;

- 3) For conferences, publicizing cane planting to community members, donation, organizing the Company's activities where the images and/or voices of attendees may be collected, as well as other operations necessary for the mentioned activities such as creating media for public relations, publicizing, liaising, and managing internal affairs of the group, making plane and accommodation reservations, coordination and relevant internal management, conducting satisfaction surveys of attendees, etc.;
- 4) For proceeding judicial process, establishing, complying or exercising rights to legal claims or raising a legal defense against the rights to legal claims;
- 5) For conducting planning, reporting, evaluation and data analytic for the the Company's operations;
- 6) For management of risks, prevention and undertaking of audits, and undertaking of internal administration;
- 7) For examination of usage of the Company's internal information systems to grant third parties' rights to access the wireless fidelity internet (Wi-Fi); and
- 8) For maintaining security within the Company's buildings and premises, inspecting and verifying identity for entering and exiting the Company's buildings and premises including preparation of identity card, building entry cards, parking membership cards, and managing membership statuses.

In the case where the Personal Data collected by the Company as stated above is necessary for the Company's compliance with applicable laws or performance of contract and if Data Subjects do not provide the Company with such necessary Personal Data, the Company may be subject to legal liabilities and/or may not be able to manage or administer contract or facilitate the Data Subjects.

3. Collected Personal Data

3.1 Personal Data that the Company collects

The Company collects several types of Personal Data from the Data Subjects, including:

- 3.1.1 Identity data, for example, name, surname, identification card number, driver license number (cars and motorcycles), vehicle registration (cars and motorcycles), passport number, date of birth, place of birth, gender, age, weight, height, nationality, marital status, photo, signature, including other data appeared on a copy of identification card, a copy of driver license, a copy of passport, etc.;
- 3.1.2 Contact data, for example, address, telephone number, e-mail, social media contracts, e.g. Line ID, Facebook account details, contact channels, etc.;
- 3.1.3 Account data, for example, username, password, etc.;
- 3.1.4 Financial or transaction data, for example, bank account number, any taxation information, salary information, etc.;
- 3.1.5 Information regarding the use of the Company's information system or other technical information, for example, IP Address, device ID, data that the Company collects through cookies or similar technologies, computer traffic information (log), access information on the Company's websites and systems, user account for using the Company's information system, etc.;
- 3.1.6 Data regarding education and employment, including training background, for example, education history and work experience, training history, date of employment, result of performance evaluation, employees' identity number, job title, department, expertise, relevant licenses, etc.;
- 3.1.7 Other personal information, for example, information of family members, information of reference persons, information of emergency contact persons, background check information, etc.; and
- 3.1.8 Other personal information regarding, for example, family members, reference persons, emergency contact persons, background check, etc.

In some cases, the Company may collect Sensitive Personal Data, for example, religion, health data including drug test result, vaccination data, etc., upon obtaining explicit consent from the Data Subjects or when permitted by law.

3.2 Personal Data of minors, incompetent persons and quasi-incompetent persons

In some cases, the Company may collect the Personal Data of minors, incompetent persons or quasi-incompetent persons. In such cases, the Company shall comply with the laws relating to collection, use or disclosure of the Personal Data of minors, incompetent persons and quasi-incompetent persons, which include obtaining consent from the legal representative or parent as required by law where the Company has no legitimate grounds other than obtaining consent for the collection, use or disclosure of such information.

3.3 Sources of Personal Data

The Company may collect the Data Subjects' Personal Data from various sources as follows:

- 3.3.1 Collect the Personal Data directly from the Data Subjects, for example, when the Data Subject makes any inquiries with the Company, when the Data Subject provides the information to the Company, when requested, steps to fill in information, affix signatures, and submit supplementary documents relevant to the Company, or from registrations, questionnaires, operation as requested prior to entering into contracts as well as attachment of contracts' supplementary documents, collection of information whilst offers of product sales via various channels, submission of requests for exercising rights to the Company, contacting the Company via various channels (for example, telephone, e-mail, Facebook account, etc.), participating in conferences or activities under the Company's obligation (for example, recording of still or motion pictures, etc.). In addition, the Company may automatically collect the Personal Data (for example, when the Data Subjects use the Company's information technology or website, etc.).
- 3.3.2 Collect the Personal Data from other sources, for example, reference persons that the Data Subject provided information to the Company, employer or entity which is the agency of the Data Subject official documents, government

documents, government authorities, private sectors, or other publicly available sources (for example, information made available on the internet, etc.)

4. Personal Data retention period

The Company retains the Data Subjects' Personal Data for as long as it is considered necessary for the purpose for which it was collected, used or disclosed as set out in this Privacy Policy. The criteria used to determine the Company's retention period include: the Company retains the Personal Data for the duration the Company has an ongoing relationship with the Data Subjects; and the Company may retain the Personal Data for a longer period as necessary to comply with applicable laws, or to be in accordance with legal prescription, or to establish, comply with or exercise the rights to legal claims or defend against the rights to legal claims, or to comply with, for any other cause, the Company's internal policies and regulations.

5. Disclosure of Personal Data

5.1 Categories of persons or entities to whom the Personal Data may be disclosed

The Company may disclose the Data Subjects' Personal Data in certain circumstances for the purposes set out in this Privacy Policy to:

5.1.1 Subsidiaries, group companies and affiliated companies listed hereunder for the purpose of undertaking activities as specified in this Privacy Notice:

- Thai Roong Ruang Industry Co., Ltd.;
- Thai Roong Ruang Corp., Ltd.;
- Phitsanulok Sugar Co., Ltd.;
- The Cholburi Sugar and Trading Co., Ltd.;
- Thai Roong Ruang Warehouse Co., Ltd.;
- Thai Ruam Toon Warehouse Co., Ltd.;
- TRR Molasses Trading Co., Ltd.,
- TRR Property Co., Ltd.;
- Siam Sugar Export Co., Ltd.;

- Thai Roong Ruang Electricity Generating Co., Ltd.;
- Thai Roong Ruang Bio-Energy Co., Ltd.;
- Phitsanulok Electricity Generating Co., Ltd.;
- Sakon for Karnkaset Co., Ltd.;
- Thai Roong Ruang Leasing Co., Ltd.;
- Thai Roong Ruang Technologies Co., Ltd.;
- TRR 35 Holding (Thailand) Co., Ltd.;

5.1.2 The Company's business allies or third parties as consented by the Data Subject or according to contractual terms or legal provisions, as the case may be;

5.1.3 Agencies, service providers, contractors and/or sub-contractors for any operations for the Company, such as eateries, sugar mills, security service providers, manufacturers and distributors of products and chemical products, platform distribution service providers, innovation and technology developing service providers, building system engineering service providers, public relations contractors, logistics service providers, travel agencies, airline companies, auditors, lawyers, legal and tax consultants and other consultants;

5.1.4 Government authorities, supervisory authorities, independent authorities or other authorities as stipulated by laws, including competent officials exercising power or performing duties according to the laws, e.g. courts, police officers, the Revenue Department, the Department of Business Development, the Department of Skill Development, the Department of Industrial Works, the Federation of Thai Industries, Office of the Board of Investment, Food and Drug Administration, Office of the Cane and Sugar Commission, Office of the Central Islamic Council of Thailand, Immigration Office, Sakon Nakhon Provincial Industrial Office, Sakon Nakhon Provincial Land Office, the Federation of Thai Industries Provincial Electricity Authority, Office of the Personal Data Protection Commission, etc.;

5.1.5 Parties in court, courts, and relevant government authorities;

5.1.6 Hospitals;

- 5.1.7 Commercial banks, financial institutions for receiving debt payment, or payment of expenses for the relevant processes;
- 5.1.8 Institutions or external organizations in relation to the conduct of research as the providers of research funding to the employees, such as the National Center for Genetic Engineering and Biotechnology (BIOTEC), Faculty of Engineering, Chulalongkorn University, etc.;
- 5.1.9 Agencies or institutions in relation to training, and organizing activities;
- 5.1.10 Other third persons as consented by the Data Subject or contractual terms or legal provisions, as the case may be, as well as various channels such as public media, online media, etc.;
- 5.1.11 Group insurance companies, non-life insurance companies, and life insurance companies, etc.;

5.2 Transmission or transfer of Personal Data to foreign countries

In some cases, the Company may transmit or transfer the Personal Data to foreign countries. In such case, the Company shall ensure that the destination country or international organization that receives such Personal Data shall have adequate data protection standard, and the Company shall provide appropriate protection and security measures and comply with the Personal Data Protection Act B.E. 2562 (2019) including obtaining consent from the Data Subjects for the transmission or transfer of Personal Data to foreign countries as required by law.

6. Rights of Data Subjects

The Data Subjects have the rights according to the Protection Data Protection Act B.E. 2562 (2019) including the following rights:

6.1 Right to withdraw consent

The Data Subjects have the right to withdraw consent given to the Company for collecting, using or disclosing the Data Subjects' Personal Data at any time, unless there is a restriction of the withdrawal of consent by law or the contract which gives benefits to the Data Subjects.

However, the withdrawal of consent shall not affect the collection, use or disclosure of Personal Data that the Data Subjects have already given consent legally.

6.2 Right to access

The Data Subjects have the right to request access to and obtain copy of the Data Subjects' Personal Data, which is under the Company's responsibility, or to request the disclosure of the acquisition of the Personal Data obtained without the Data Subjects' consent.

6.3 Right to data portability

Where the Company arranges the Data Subjects' Personal Data to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means, the Data Subjects have the right to receive the Data Subjects' Personal Data from the Company including the right to request the Company to send or transfer the Data Subjects' Personal Data in such formats to other data controllers as provided by the law.

6.4 Right to object

The Data Subjects have the right to object to the collection, use or disclosure of the Data Subjects' Personal Data on grounds stipulated by law.

6.5 Right to erasure

The Data Subjects have the right to request the Company to erase, destroy or make the Data Subjects' Personal Data become unidentifiable data under certain circumstances as provided by law.

6.6 Right to restriction of use

The Data Subjects have the right to request the Company to restrict the use of the Data Subjects' Personal Data under certain circumstances as provided by law.

6.7 Right to rectification

The Data Subjects have the right to request the Company to modify the Data Subjects' Personal Data to be accurate, up-to-date, complete, and not misleading.

6.8 Right to file a complaint

The Data Subjects have the right to file a complaint to an authorized officer appointed by the Personal Data Protection Act B.E. 2562 (2019) when the Company violates or does not comply with such law.

In the case where the Data Subjects submit a request to exercise the rights under the provisions of the Personal Data Protection Act B.E. 2562 (2019), upon receiving the request, the Company will proceed such request within the period as stipulated by law. In this regard, the Company reserves the right to refuse or not process the request under certain circumstances as stipulated by law.

7. Security measures for Personal Data

The Company implements appropriate and strict security measures for protecting the security of Personal Data in order to prevent unauthorized or unlawful loss, access to, use, alteration, correction, or disclosure of Personal Data.

In the case where the Company assigns third parties to process the Personal Data pursuant to the orders given by or on behalf of the Company, the Company shall appropriately supervise such third parties to ensure that they will maintain the security of the Data Subjects' Personal Data according to the Personal Data Protection Act B.E. 2562 (2019)

8. Contact information

If the Data Subjects have any questions or inquiries about the Personal Data protection, collection, use or disclosure of the Data Subjects' Personal Data, or exercise of the Data Subjects' rights, or have any claims, please contact the Company via the Data Protection Officer:

Data Protection Officer Contact Information

Address: TRR Tower, No. 238, Naradhiwas Rajanagarindra Road, Chong Nonsi Subdistrict, Yannawa District, Bangkok 10120

Telephone: 02-294-5588

E-mail: TRRdpo@trrgroup.com

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