

Berli Jucker Public Company Limited (BJC) has established a Personal Data Protection Policy to comply with privacy regulations. This policy outlines how BJC collects, uses, and protects personal data, along with data subjects' rights and how they may exercise them.

To ensure compliance with the Personal Data Protection Act (PDPA) and BJC's internal policies, an annual IT audit was conducted to assess the effectiveness of the internal control systems related to privacy and data protection.

In 2024, the scheduled annual IT audit for compliance with the relevant Personal Data Protection Act (PDPA) was conducted from September 3 - October 30, 2024. The objective was to determine reasonable assurance of the internal control system's compliance with PDPA, focusing on:

- 1. Policies and procedures are complied with applicable laws and regulations
- 2. Efficient and effective use of resources
- 3. Maintenance of effective and efficient operations
- 4. Achievement of data protection objectives

The Annual Auditing 2024 included the following components:

- 1. Review of the structure and contents of the Privacy Data Protection Policy
- 2. Evaluation of organizational compliance with the Privacy Data Protection Policy in practice
- 3. Verification of Records of Processing Activities (ROPA) registration
- 4. Assessment of consent mechanisms, documentation, and privacy notices
- 5. Review of personal data storage, retention, and destruction practices
- 6. Evaluation of training and awareness programs for employees
- 7. Examination of information access controls and data security risks
- 8. Review of personal data breach and data subject rights handling procedures

From the 2024 Annual Audit Summary Report on compliance with the Personal Data Protection Policy for Berli Jucker Public Company Limited and Big C Supercenter Public Company Limited, areas for improvement were identified. The audit revealed moderate risks across six key areas: incomplete Records of Processing Activities (ROPA), absence of documentation and role awareness for data processors, lack of formal training and communication on PDPA for employees, incomplete or inaccurate privacy notices, insufficiently operationalized procedures for handling data breaches and data subject requests, and the need for stronger practices in purpose limitation and data minimization.

Although foundational structures and policy frameworks are in place, these findings indicate gaps in operational implementation that require remediation. Management has acknowledged the findings and initiated corrective actions with defined responsibilities and deadlines. The internal audit team will continue to monitor progress to ensure full compliance with the Personal Data Protection Act and related policies across all relevant business units.

