Berli Jucker Public Company Limited
บริษัท เบอร์ลี่ ยุคเกอร์ จำกัด (มหาชน)

Personal Data Protection Policy	**Support Answer: 3.7 Privacy Protection**
	Topic: Privacy Policy: Systems/ Procedures
	Reporting Year: 2025

BJC's comprehensive Personal Data Protection Policy applies to all operations, including suppliers, and clearly designates the personnel and department responsible for privacy matters. This policy is seamlessly embedded into the company's group-wide risk management system, outlining disciplinary actions in cases of non-compliance. To ensure adherence, BJC has undergone third-party and internal audits assessing privacy policy compliance.

This document undergoes an annual review process, with the most recent evaluation confirming that no changes or revisions were required, as the information remains current and relevant.

Personal Data Protection Policy For Public

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1. Objectives

- To set guidelines for the management of personal data management according to the Personal Data Protection Act B.E. 2562 (2019)
- To define the roles and responsibilities of those involved in the storage of personal data.
- To establish a hierarchy of confidentiality and security of personal information.
- To define the methods of storage, use, forwarding, surveillance, notification if an adverse event occurs with the handling of personal data.
- To determine liability and penalties relating to non-compliance with the law to establish guidelines for the processing of personal data protection for all personnel those working with the Company. Understand and strictly comply with this Policy. If the Company's employees or personnel do not comply with the requirements and guidelines for the processing of personal data protection, the Company will not be required to comply with the requirements and guidelines for in such cases, it is a significant breach of the Company's employment-related policies and the Company reserves the right to consider punishing such persons as appropriate.
- This policy applies to the entire operations in BJC, including our suppliers

2. Guidelines for processing the protection of personal data

To encourage organizations to be prepared to comply The Personal Data Protection Act B.E. 2562 (2019) is required to follow the following guidelines:

2.1 Require the establishment of a data control department (Data Protection Office)
Responsible for controlling the operations of the Group Company, Responsible for the supervision of the personal information protection policy. and operational framework
Data Protection Office has the following duties:

- Launching protection personal data guidelines and policies. Propose to management board for approval
- Appointment “Data Protection Officer” initial is “DPO”) who responsible for managing this Policy. The Data Protection Office (DPO) has responsibility to establish guidelines and personal data protection policies as corporate-wide policy, define personal data scope to comply with applicable laws or regulations, integrate data breach issue to enterprise risk management and assess the impact and raising awareness to employee in organization
- Determine what actions of the group of companies that make the Company and its related parties become legal “data controller” in accordance with the law, who will be responsible for the management of information in accordance with this policy.
- Determine what actions of the group of companies that make the Company and its related parties become legal “data processors” in accordance with the law, who will be responsible for the management of information in accordance with this policy.

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- Consider the information of the organization to determine "Personal Data" that must be processed accordance with applicable laws or regulations.
- Establish a framework for governance and management of corporate data (Data Governance, Data Management, Data Protection).
- Establish a risk management framework. risk assessment Personal Data Protection Impact Assessment (Privacy/Data Protection Impact Assessment, Risk Assessment)
- Clearly determine who responsible for each business process (Business Owner) and Data Owner
- Developing practices procedure Personal Data Protection Practice Guide and announced within the organization
- Raising awareness and knowledge enhancement for Data Processor
- Enhancing knowledge for those assigned "Data Protection Officer" and related workers under the Privacy Data Protection framework
- Establish a framework for coordination with government regulators and other relevant collaborative agencies now and in the future

2.2 Personal Data

In order for the Company to operate our business, it is necessary for Company to collect your personal data for the benefit of business operation and service e.g. first name, last name, identification card number, address, contact number, e-mail address, and usage history etc.

Due to the diversity of information collected, use the following guidelines to determine which information is personal information.

- Personally Identifiable Information by posting or requesting personally identifiable information, including (but not limited to)
  - ID Card No. , Social security number , Passport No.
  - State issued ID card
  - Student ID card or University ID Card which showing at least two of the following items. (1) Name (2) Photo (3) Identification number
  - Digital Identity including password
- History of medical/psychological, biometric, or genetic information of another person
- Personally Identifiable Information via external links.
- Business financial information
- Personal financial information (your own or others) as following
  - Bank account and/or credit card information
  - Financial records along with account information
- Personal contact information as followings
  - Phone No. or Personal E-Mail
  - E-Mail Messenger and identifiable

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- The above information can be used for charitable purposes. Non-infringing service or assist in the search for a missing person or animal except in the case of news based content. or content that claims or certifies that it comes from the infringing source. Regardless of whether the affected person is a public figure or a general public.
- A Person's name and documents indicating personal information. which consists of
  - Driver's license, Other state-issued identification card than a driver's license, green card, or immigration document.
  - Marriage certificate, Birth certificate and Name change certificate
  - Digital Identity including password
  - Vehicle registration No.
- Exterior view of a private residence as below following conditions
  - The residence is a detached house. or has the house number shown in the picture/caption
  - Specify a city or district
  - Refer or represents the residents
  - Residents oppose to disclosure their personal residence.

3. The right of the personal data owner and data subject

3.1 The right of the personal data owner

Owners of personal data have the rights to be protected under the Personal Data Protection Act B.E. 2019 as follows:

3.1.1 The right to revoke the consent

In the case where the Company has requested and received consent to collect, use or disclose for benefit thereof in accordance with the purpose mutually agreed by the data owner, the data owner has the right to revoke his/her consent on the use of such personal data at any time

3.1.2 The right toaccess and receive a copy of personal data stored by the Company

The data owner has the right to access and receive a copy of his/her data stored by the Company under the criteria set forth by the Personal Data Protection Officer

3.1.3 The right of request for disclosing the procurement of personal data from an alternative source

In the case where the Company has received personal data from any source other than directly from the owner of the data, the Company will inform the owner within 30 days after the date receiving such personal information (unless it is required by law). In such a case, the data owner may inquire and request the Company for disclosure of the source of such personal data

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3.1.4 The right to receive and request the Company to transfer or forward the data to other personal data controller when the Company adjusts the format of the data storage for automated reading and transfer

In the case where the Company has received personal data from any source other than directly from the owner of the data, the Company will inform the owner within 30 days after the date receiving such personal information (unless it is required by law). In such a case, the data owner may inquire and request the Company for disclosure of the source of such personal data

3.1.5 The owner's right to object to the collection and use of personal data

The owner has the right to object to the collection and use of his/her data under the following circumstances:

3.1.5.1 The collection of personal data can proceed without consent as permitted by the bylaws or other juristic person other than personal data controller (unless such benefit is below basic right of the data owner or;

3.1.5.2 The collection, use, or disclosure of personal data is for direct marketing;

3.1.6 The right to request to destroy or turn personal data given to Company into unanimous data.

The data owner may make a request to the Company for the elimination of his/her own personal data and/or turn his/her given data into unanimous data under the following circumstances:

3.1.6.1 The personal data is no longer necessary for the storage of personal data according to the objectives.

3.1.6.2 When the data owner revokes his/her consent in collecting, using, or disclosing personal data, the Company shall have no legal authority to collect, use, or disclose such data.

3.1.6.3 When the data owner exercise his/her right to oppose the collection, use, or disclosure of personal data, the Company shall not reject such request or;

3.1.6.4 When personal data is collected, used, or disclosed illegally,

3.1.7 The right of request to the Company for suspension of personal data

The data owner may inform the Company to suspend the use of his/her data immediately under the following circumstances:

3.1.7.1 When the personal data controller is under the examination of accuracy, completeness, or update such data as per the data owner's request.

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3.1.7.2 When such personal data could be deleted or destroyed, the data owner may request to suspend such data instead of deletion or destruction.

3.1.7.3 When such personal data is no longer necessary for storage under the purpose of data collection but the data owner requests to continue the storage for initiation of right permitted by law, compliance or exercise of a legal right or to raise as a right of a claim as permitted by law.

3.1.7.4 When the Company is considering the exercise of data owner's right against the collection, use, or disclosure of personal data

3.1.8 The right to request the Company to correct, validate and update personal data

In case of any changes regarding personal data given to the Company or that the Company has collected, the data owner may request the Company for any correction or update at any time.

3.1.9 The right of claim in case it is found offensive against Personal Data Protection Act B.E. 2562

In case the data owner finds that the Company and/or employee of the Company conduct any action that violates or contravene the Personal Data Protection Act B.E. 2562, the data owner may report such violation to the Company and/or relevant authority as detailed in Article 4 of this document.

3.2 The right of the personal data subject

In case of the personal data owner wishes to subject any rights as shown in clause 7.1 above, the user will not be entitled to any rights. The personal data subject can contact the personal data subject at any time according to the details of the convenient contact channel for the owner of the personal data, as specified in Article 18 of this Policy.

4. Collection of Personal Information

4.1 Collection Of Personal Information

In any collection of your personal data, the Company will proceed on a necessary basis under legal purposes and under purposes informed to you at the time of or before collecting your personal data only.

4.2 How to collected personal data

The company shall not collect, use, or disclose Personal Data, unless the data subject has given consent prior to or at the time of such collection, use, or disclosure, except the case where it is permitted to do so by the provisions of this Act or any other laws.

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Obtaining consent from a minor incompetent or virtually incompetent. In the event that company has contact or needs to obtain personal information of a minor. Company will process to consent of the person with the authority to act on behalf of such person.

4.3 Types of data collected, the purpose of collection, and how long they are collected

The Company provides records regarding the processing of data logs for the recording of the types of data collected, the purpose of collection, and how long the personal data is collected by the Company. The Company will update and add such records to be up-to-date and accurate in accordance with the facts regarding the use of personal information.

5. Collection of personal data from sources other than the owner of personal data

The Company always collects personal data directly from the owner of the personal data, unless:

1. It is the case that the Company is legally exempted from being able to collect personal data of the owner of personal data from sources other than the owner of personal data
2. It is necessary for the Company to collect personal data of the personal data subject from sources other than the owner of the personal data. The Company must notify the data subject of the collection of information from other sources to the owner of the Personal Data within 30 days from the date of consent

6. Using of Personal Information

6.1 General Principles for The Using of Personal Information

To use personal information collected by the company. at any time, the company will operate in accordance with the following principles and guidelines:

(1) The company will use personal data only for the purposes for which the owner of the personal information is notified

(2) For personal data that the Company can collect without the consent of the owner of the Personal Data as specified in Clause 4.2, the Company will use such Personal Data only for the purposes specified in Clause 4.2, and the Company will record the use of such personal data in the Data Log

6.2 Access to personal information

The Company defines the conditions and procedures for accessing personal information that the Company has collected. To use or disclose for the purposes that have been notified to the owner of personal data accordingly to Data Mapping

6.3 Data Protection Impact Assessment

The Company will arrange to conduct an assessment of the impact on personal data every time in case the Company uses personal data in a high-risk manner. The assessment will be prepared in accordance with the Data Protection Impact Assessment.

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7. Storage of personal data and how to personal data are maintained and protected

The Company will maintain a record of processing activities ("**ROPA**"), the personal data collected and the purpose of each type of personal data collection and the length of time for which each type of personal data is stored

The Company will ensure that any actions taken against the personal data stored by the Company are properly protected and secured from loss. Use, access, alteration, modification or disclosure of personal data without authority or any unlawful conduct.

8. Disclosure of personal information

The Company will retain your personal data without disclosing such data to any third party or the public except for the cases where the Company disclose your personal data in accordance with the purposes informed to you as shown in [Notice of details pertaining to collection, use and disclosure of personal data] or except for your express consent obtained by the Company or any other legitimate interest for disclosure

In operating Company's business, the Company will not transfer or disclose your personal data to the abroad recipients except for the cases that the Company discloses your personal data for the purposes informed to you or except for your express consent obtained by the Company or any other legitimate interest for disclosure.

9. Destruction of personal information

The Company will delete or destroy personal data when the retention period is overdue as specified for each type of data, or if the Personal Data is not necessary for the purposes of the Company or the relevant laws for collection. Use or disclose such information anymore, or when requested by the personal data subject.

10. Breach of personal information

When a personal data breach occurs, the company must notify Office of the Personal Data Protection Commission (PDPC) without delay, no later than 72 hours after having become aware of it. Unless such violations do not pose a risk of impact. Rights and freedoms of persons in the event that the violation carries a high risk of affecting the rights and freedoms of the person, notify the owner of the personal data together with the remedy guidelines.

The company must specify in the relevant agreement or contract that the data processor has a duty to report of the personal data breach to the company without delay within 72 hours from the data processor is aware of it.

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10.1 Disciplinary actions in case of breach according to company regulations.

Those who neglect to adhere to the Data Protection Act and fail to comply with this policy will be subject to penalties in accordance with the company's regulations, including any other relevant sanctions.

11. Data protection officer/ Internal agency in charge of personal data protection

The company has appointed a personal data protection officer / assigned duties to internal agencies in charge of personal data protection to perform its duties in advising and monitoring the company's actions in relation to the collection. use and disclose personal data in accordance with the requirements under the personal data protection act B.E. **2562 (2019)** and related regulations. in this regard, the company has documented the duties, responsibilities and duties of the personal data protection officer in the documentation of the initial duties, responsibilities and qualifications of the personal data protection officer and the internal agency of the company in relation to the protection of personal data, so that the performance of the personal data protection officer/internal authority in charge of the protection of personal data and the persons involved is in accordance with the purposes set forth in the personal data protection law.

There is security and data privacy audit according to the requirements of ISO27001:2013, which covers personal protection policy compliance. In addition, internal audit is also conducted by internal audit department follow scope of the Bank of Thailand.

In the event that the personal data subject wishes to exercise any rights of the owner of the personal data that appears as specified in article **7** of this policy, the privacy company shall not be entitled to any rights to the personal data holder as specified in accordance with article **7** of this policy. the owner of the personal data can inform the company of the intention of exercising such rights to the company in accordance with the following contact channels

The Company's Personal Data Protection
Data Protection Officer:
Email: dpo@bjc.co.th
Please specify email subject as: “Request for exercise of the data subject’s right”
Address: Berli Jucker Public Company Limited (BJC)
99 Soi Rubia, Sukhumvit 42 Road, Phrakanong, Klongtoey, Bangkok 10110, Thailand
Telephone : 02-146-5999

In the event that the personal data subject wishes to contact a government agency related to the protection of personal data, please contact: Office of the Personal Data Protection Commissioner.
Telephone: 02-142-1033, 02-141-6993
Address: 120 Moo 3, Government Center for 80th Birthday Anniversary, Ratthaprasasana Phakdi Building (B) Floor 7, Chaeng Watthana Road, Thung Song Hong, Lak Si, Bangkok 10210

Berli Jucker Public Company Limited

Announced on June 1, 2022

(Mrs.Thapanee Techajareonvikul)
Chief Executive Officer and President

Berli Jucker Public Company Limited