



Personal Data Protection Policy

TOA Paint (Thailand) Public Company Limited and Subsidiaries

1) Principles and Rationale

The Personal Data Protection Act B.E. 2562 (2019), which came into full effect on June 1, 2022, together with TOA Paint (Thailand) Public Company Limited and its subsidiaries, such as Captain Coating Co., Ltd. and/or any affiliated companies ("the Company"/"Subsidiaries"), recognizes the importance of protecting personal data as a fundamental right of privacy that must be safeguarded. The Company places the highest importance on compliance with the Personal Data Protection Act and on ensuring that personal data owners can trust that the Company will protect their data with appropriate security measures.

Accordingly, the Company has established policies and practices on personal data security, consisting of:

- One main policy: Personal Data Protection Policy
- One guideline: Practical Guidelines for Personal Data Protection

This document is the main policy: Personal Data Protection Policy.

2) Scope of Application

2.1 This announcement shall apply to the Board of Directors, executives, and employees at all levels of TOA Paint (Thailand) Public Company Limited and its subsidiaries, including partners, service providers, business alliances, and stakeholders.

2.2 This announcement apply to all company activities involving personal data, such as storage channels, types and formats of stored data, purposes of data use, sharing of such data with others, and the Company's methods of safeguarding personal data.

3) Definitions

"Company": TOA Paint (Thailand) Public Company Limited and subsidiaries.

"Subsidiaries": A limited company or public limited company under the Company's control, as defined by the SEC.

"Personal Data": Information related to a natural person that can directly or indirectly identify such person, excluding legal entities and deceased persons.

"Data Subject": A natural person (including those associated with legal entities, such as directors, officers, shareholders, etc.).

"Person": A natural person.

4) Collection of Personal Data

The collection of personal data shall be conducted only for purposes necessary and directly related to the objectives of such collection. The data subject must be informed before or at the time of collection regarding:

- 4.1 Purpose of collection
- 4.2 Personal data collected and retention period
- 4.3 Notification if data must be provided for legal/contractual compliance, including possible consequences of not providing data
- 4.4 Types of persons or entities to whom the collected data may be disclosed
- 4.5 Rights of the data subject
- 4.6 Details of the data controller, contact address, and method of contact

5) Use or Disclosure of Personal Data

The use or disclosure of personal data shall be in line with the stated purposes or directly necessary benefits, with consent from the data subject, except in the following cases where consent is not required:

- 5.1 For the benefit of state planning, statistics, or census
- 5.2 To prevent or suppress danger to life, body, or health
- 5.3 Publicly available information disclosed by law
- 5.4 For legal investigations or court proceedings
- 5.5 As required by law or court order

6) Quality of Personal Data

Collected personal data must be accurate, up-to-date, complete, and not misleading, unless otherwise required by law.

7) Data Security Measures

To ensure confidentiality and security of personal data, the Company has implemented the following measures:

7.1 Defining rights of access, use, disclosure, processing, and verification of personal data strictly in line with Company policy

7.2 International transfer/storage permitted only if destination country has equal or stronger protection

7.3 In the event of data breach or leak, Company shall promptly notify data subjects and provide remediation plan. Company shall not be responsible for damages arising from user negligence or consented third-party actions

7.4 Regular audits and assessments by internal audit unit

8) Responsibilities of Individuals

All employees and relevant units must strictly adhere to this policy in collecting, using, or disclosing personal data. The Risk Management & Compliance Department shall oversee and monitor effective implementation of the policy.

9) Rights of Data Subjects

Under the Personal Data Protection Act B.E. 2562, data subjects have the following rights:

- Right to access their data
- Right to request transfer, deletion, or destruction of data
- Right to object to collection, use, or disclosure
- Right to request correction to ensure accuracy, currency, and completeness

These rights are subject to limitations under law, national security, legal investigations, or rights of others.

Contact details:

Data Protection Officer

TOA Paint (Thailand) Public Company Limited

31/2 Moo 3, Bangna-Trad Road, Bangsaothong, Samutprakarn 10570

Email: data.privacy@toagroup.com | Call Center: 02 335 5555

10) Penalties

Any employee or responsible person who neglects, omits, or fails to comply with this policy in performing their duties, resulting in violations of law and/or damages, shall be subject to disciplinary action. If such violations cause damage to the Company and/or others, the Company may pursue further legal action.

11) Review of Policy

The Company will review this policy periodically or in the event of legal amendments.

This policy shall be effective from June 1, 2022 onwards.

Announced on July 22, 2022

(Mr. Jatuphat Tangkaravakoon)

Chief Executive Officer