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**CPF Trading Company Limited**

**Personal Data Protection Policy**

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## 1. Objective

CPF Trading Company Limited (“the Company”) respects and gives importance to the Personal Data protection of the Company and its subsidiaries’ personnel, customers, suppliers, and business partner which the Company and its subsidiaries are determined to protect the Personal Data from illegal use and to secure its Personal Data in accordance with accepted international standards. Therefore, the Company issues this Personal Data Protection Policy (“this Policy”) for the purpose as follows:

- 1.1 To be secure, reliable, and confident to the data subject in the transactions with the Company
- 1.2 To protect the damages from exploitation or illegal use in the personal data
- 1.3 To comply with the Personal Data Protection Act.

## 2. Scope

This Policy applies to the Company and its non-listed subsidiaries. For the Company's listed subsidiaries and their subsidiaries, they can deploy this Policy as appropriate to align with their business context and internal management process according to the geosocial background of the country in which they operate. The enforcement of this Policy shall be in accordance with any applicable Personal Data Protection Act enforced in each country for each relevant subsidiaries and subject to other requirements that may additionally defined under such Personal Data Protection Act.

## 3. Terms and Definitions

### **Personal Data Protection Act**

Any law related to the protection of Personal Data or privacy whether it be domestic law, international law, or any regional law which takes into effect at the Company, its subsidiaries, or the business engagement of the Company and its subsidiaries

### **Personal Data**

Any data related to a living individual which enables either direct or indirect identification of such individual e.g., name and surname, identification card, including all sensitive

personal data, but not including deceased subject to the Personal Data Protection Act in each country

**Sensitive Personal Data**

Personal Data related to racial or ethnic origin, political opinion, doctrinal, religious or philosophical beliefs, sexual behaviour, criminal records, health records, disability, labour union data, genetic or biometric data or any other data which may affect a data subject in the same manner, as prescribed by the Personal Data Protection Act

**This Policy**

This Personal Data Protection Policy

**The Company**

CPF Trading Company Limited

**Subsidiaries**

Subsidiary companies in accordance with Securities and Exchange Act and subsidiary companies as included in the financial statements of the Company, but excluding:

- (a) a subsidiary company whose ordinary shares are listed in any stock exchange;
- (b) any subsidiary company of a company under (a)

**Directors**

Directors of CPF Trading Company Limited and/ or its subsidiaries

**Executives**

Executive of CPF Trading Company Limited and/ or its subsidiaries

**Employees**

The Company or its subsidiaries' employees that receive daily or monthly remuneration whether on permanent, temporary or special employment contracts.

**Personnel**

Directors, Executives, and Employees of CPF Trading Company Limited and/or its subsidiaries

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**Data Protection Officer**

A person appointed to be in charge of monitoring, auditing and giving advice for a purpose of compliance with the Personal Data Protection Act

**4. Roles and Responsibilities****4.1 Board of Directors**

To govern, encourage and support the Company and its subsidiaries to execute the protection of personal data in compliance with the Personal Data Protection Act.

**4.2 Executive Committee**

4.2.1 To govern, encourage and support the Company to establish operational processes which comply with the Personal Data Protection Act.

4.2.2 To support operations of the functions or personnel related to the personal data protection.

**4.3 Subsidiaries' Board of Directors**

4.3.1 To govern, encourage and support the company, in which they are holding a position as a director, in establishing operational processes to comply with the Personal Data Protection Act.

4.3.2 To support operations of the functions or personnel related to the personal data protection.

**4.4 Executives**

4.4.1 To establish regulations, practices and measures regarding the collection, retention, use and disclosure of the Personal Data pursuant to the Personal Data Protection Act and internationally accepted standards, whether the collection, use and disclosure of the Personal Data are done by the functions under their supervision or by an external company or third party being employed for such purpose on their behalf.

4.4.2 To put in place organizational structure and personnel in charge of operation in compliance with this Policy.

4.4.3 To supervise the implementation of the policies, practices and regulations as well as improvement for efficient practices and regular reporting of results.

#### **4.5 Data Protection Officer**

- 4.5.1 To monitor, investigate and supervise the operations of the Company and its subsidiaries as well as its personnel in relation to the collection, use and disclosure of the Personal Data pursuant to the Personal Data Protection Act.
- 4.5.2 To create and promote awareness regarding matters related to the personal data protection.
- 4.5.3 To advise and recommend the Board of Directors, senior executives and employees of the Company and its subsidiaries in respect of the performance of their duties in compliance with the Personal Data Protection Act.
- 4.5.4 To act as a center of contact on matters related to the Personal Data, protection of the Data Subject's right, and to liaison and cooperate with relevant government agencies.
- 4.5.5 To keep confidential the Personal Data made aware or obtained through performance of duties pursuant to the Personal Data Protection Act and/or this Policy.

#### **4.6 Functions Related to Personal Data**

To perform duties in compliance with the Personal Data Protection Act and operate in accordance with the policies, practices and instructions in relation to the protection of Personal Data by the Company and/or its subsidiaries.

#### **4.7 Employees**

- 4.7.1 To comply with the Personal Data Protection Act and this Policy as well as regulations and practices related to the protection of Personal Data.
- 4.7.2 To inform its direct supervisor and/or the Data Protection Officer immediately upon becoming aware of any leak or breach of the Personal Data.
- 4.7.3 When coming across any act which may violate this Policy, report such act through the channels provided under the Company and/or its subsidiaries' Whistleblowing Policy.

## **5. Principle**

### **5.1 The Objective for Collection, Usage, and Disclosure of the Personal Data**

5.1.1 The Company and its subsidiaries shall collect, use, or disclose the Personal Data for the purposes of stipulating in the privacy notice, in comply with laws or regulations, related to the operation and for the other lawful purposes of the Company and its subsidiaries.

5.1.2 The Company and its subsidiaries must not collect, use or disclose any Personal Data other than for the purpose being notified to the Data Subject, unless:

- (1) The Company and its subsidiaries have notified the new purpose to the Data Subject and have received a consent from the Data Subject pursuant to the Personal Data Protection Act; or
- (2) It is permitted by the Personal Data Protection Act or other laws.

### **5.2 Collection of Personal Data**

5.2.1 The Company and/or its subsidiaries shall collect the Personal Data as necessary as the purposes previously informed to the data subject and/or as required by the Personal Data Protection Act.

### **5.3 Retention of Personal Data**

5.3.1 The Company and its subsidiaries shall provide security measures to collect the Personal Data in accordance with the Personal Data Protection Act.

5.3.2 The Company and its subsidiaries shall notify the incidence of the Personal Data breach to related authority and/or data subject in accordance with the Personal Data Protection Act.

5.3.3 The Company and its subsidiaries shall retain the Personal Data for the period as necessary to achieve the purpose for each data processing.

#### **5.4 Usage and Disclosure of Personal Data**

- 5.4.1 The Company and its subsidiaries shall use or disclose the Personal Data as necessary in accordance with the purposes and/or the Personal Data Protection Act.
- 5.4.2 The Company and its subsidiaries shall not disclose the Personal Data, unless otherwise obtained the consent from the data subject or stipulated in the Personal Data Protection Act.
- 5.4.3 The Company and its subsidiaries may disclose the Personal Data to the affiliated and/or other persons both domestic and international such as service providers that related to the Personal Data operation. However, in such disclosure, the Company and its subsidiaries shall carry out such disclosure in accordance with the Personal Data Protection Act.
- 5.4.4 The Company and its subsidiaries may disclose the Personal Data to the government agency and public authorities having the duties to supervise, including other persons who request the Company and its subsidiaries to disclose the data by virtue of law such as the request for the purposes related to litigation or legal proceedings.
- 5.4.5 The Company and its subsidiaries shall provide appropriate security measures for preventing its personnel and third parties unauthorized or unlawful access to the Personal Data.

#### **5.5 Rights of Data Subject**

- 5.5.1 The data subject has the rights as entitled by the Personal Data Protection Act which may include the rights as follows:
- (1) Right of Access and Obtain a copy of Personal Data;
  - (2) Right to request the disclosure of the acquisition of the Personal Data obtained without his or her consent;
  - (3) Right to Data Portability;
  - (4) Right to Object the Processing of Personal Data;

- (5) Right to Delete, Destroy or Anonymize Personal Data;
- (6) Right to Restriction;
- (7) Right to Rectify;
- (8) Right to Withdraw Consent; and
- (9) Right to Lodge a Complaint

5.5.2 The Company and its subsidiaries shall operate according to the request of the data subject in accordance with the Personal Data Protection Act which the Company and its subsidiaries (as the case may be) shall record such request of the data subject as evidence.

#### **5.6 Cross-Border Transfer of Personal Data**

To send or transfer the Personal Data to organizations engaging in foreign country, the Company and its subsidiaries shall ensure that the destination country have adequate data protection standard or carry out in accordance with the conditions of the Personal Data Protection Act.

#### **5.7 Erasure or Destruction of Personal Data**

5.7.1 The Company and/ or its subsidiaries shall erase or destruct the Personal Data or anonymize the Personal Data to become the anonymous data which cannot identify the data subject, where the following ground applies;

- (1) When the period of use to the purposes for collecting the Personal Data ends;
- (2) When the Personal Data exceeds necessity;
- (3) When the data subject requests; or
- (4) When the data subject withdraws the consent

Unless the agency or responsible persons shall retain the Personal Data as required by laws of each country.



5.7.2 Erasure or destruction of Personal Data from the storage system shall be the security approach and non-leaking of the Personal Data.

### **5.8 Outsourcing Data Processing**

In the event that the Company and/or its subsidiaries hire any company or third parties to collect, use, or disclose the Personal Data on behalf of the Company and/or its Subsidiaries.

5.8.1 The Company and/or its subsidiaries shall select the company or persons having the standardized data protection systems or safeguards;

5.8.2 The Company and/or its subsidiaries shall make data processing contract with the company or third parties to control the performance of their duties in accordance with the Personal Data Protection Act and this Policy.

## **6. Penalty**

Any employee who acts in violation of, or fails to comply with, this Policy, whether directly or indirectly, shall be subject to the disciplinary action according to the work rules of the Company or its subsidiaries as well as the penalty as imposed by the law.

## **7. Policy Revision**

The Data Protection Officer or the assigned function shall revise this Policy on an annual basis or earlier as appropriate. If the Policy is no longer align with the Personal Data Protection Act which may be amended at any time or found to be unsuitable with the nature of business operations of the Company and/or its subsidiaries operations, the Data Protection Officer or the assigned function shall revise and propose the revised policy to the Board of Directors for approval.

This Personal Data Protection Policy was approved the Board of Directors on 1 February 2023.