

## **Personal Data Protection Management Policy EASY BUY Public Company Limited**

### **1. Purpose and Scope of the Policy**

EASY BUY Public Company Limited is intended to provide good internal control system and strictly comply with the Personal Data Protection Act B.E.2562 (2019) and related laws of all countries by handling the Personal Data to the rights of Data Subjects and designated a data protection officer including providing the adequate tools or equipment in order to prevent violation from the collection, use and disclosure the Personal Data unlawfully or without authorization.

### **2. Definition**

Company	EASY BUY Public Company Limited, a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data as data controller
PDPA	Personal Data Protection Act B.E.2562 (2019)
Regulator	The Minister of Digital Economy and Society, any person and committee who perform acts under PDPA
Personal Data	Any information relating to a natural person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased Persons in particular
Sensitive Data	Any Personal Data pertaining to racial, ethnic origin, political opinions, cult, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, trade union information, genetic data, biometric data, or of any data which may affect the data subject in the same manner, as prescribed by PDPA
Data subject	An individual who is an owner of Personal Data and located in Thailand regardless of nationality such as Customer, Director, Employee, Shareholders, etc.
Data Controller	A Person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data. For the purpose of these Policy, Data Controller may be EASY BUY Public Company Limited
Data Processor	A natural person or a juristic person who operates in relation to the collection, use, or disclosure of the Personal Data pursuant to the orders given by or on behalf of a Data Controller, whereby such Person or juristic person is not the Data Controller. For the purpose of these Policy, Data Processor may be the Outsource Agency
Outsource Agency	A natural person or a juristic person conducting activities of collection, use and disclosure of the Personal Data on order or on behalf of the Company as data processor including access cross-border data.
Data Processing Agreement	A legal document signed the Data Processor either in written or in electronic form, the purpose of which is to regulate the terms and conditions of Personal Data
CEO	Chief Executive Officer

DPO	Data Protection Officer
DPC	Data Protection Committee
DPC Secretary	Secretary of the Data Protection Committee
RoPA	Record of Process Activity

### 3. Basic Principle of Practice

3.1 The Company shall handle the Personal Data of Data Subjects properly in compliance with laws and regulations in the Kingdom of Thailand by taking into account of the Company's Corporate Governance Policy.

3.2 The Company shall educate directors, executives and employees so that they understand the importance of protecting Personal Data in order to handle it properly.

3.3 The collection of Personal Data shall be limited to the extent necessary in relation to the lawful purpose of the Company. The Company shall notify and/or disclose the purpose of such Personal Data collection to Data Subjects prior to or at the time of such collection, unless the data subject already knows of such details. The Company shall use personal data only within the purpose decided by law and shall not use personal data beyond the disclosed purpose except as permitted by the law.

3.4 The Company shall not supply any personal data to third parties without the prior consent of the data subject concerned, except as permitted by the law.

3.5 The Company shall establish measures to ensure that the data subjects are entitled to exercise their rights for correcting and disclosing personal data including prescribed legal obligations. The company provides the channel to receive opinions and inquiries regarding the handling of such personal data from the data subject right.

3.6 The Company shall take necessary and appropriate measures to ensure the security of Personal Data and shall endeavor to prevent improper access to, alteration, loss and/or leakage of Personal Data including prepare and maintain RoPA in accordance with the Law.

3.7 The Company shall appoint DPO and/or DPC by CEO, have duties according to the defined law based on three lines of defense model to hold their roles and responsibilities for a term of four years. Upon the expiration of the term, CEO can consider to reappoint the DPO and/or the DPC. In the case where the DPO or any member of the DPC vacates before the expiration of the term, CEO can appoint a new DPO and/or any new member of DPC. The Company will support providing adequate tools or equipment as well as facilitate the access to the personal data or a meeting allowance or other benefits in order to perform the duties by the law. The Company may appoint person(s) having skills or experience that will be useful for the duties performed by the Company as its Adviser(s).

3.8 When Outsourcing to handle the Personal Data and/or Cross-border Data, The Company shall provide an agreement between the parties to control and monitor such Outsource Agency to ensure that appropriate measures are taken to protect Personal Data in relation to access control, including any additional technical and organizational security measures as required by the Company from time to time upon written request and in compliance with applicable laws, including Data Protection Laws.

## 4. Roles and Responsibilities

**4.1 CEO** is responsible to ensure the Company's Personal Data Protection Program has been implemented and maintained effectively including making consideration of personal data problems will be taken the appropriate action. To appoint DPO and/or DPC members and/or Advisor(s) who have distinguished knowledge, skills, and experience may be defined by the law and/or useful for the duties performed by the Company.

**4.2 DPO** is responsible to give advices with respect to compliance with the law. Monitor and assure the performance with respect to collection, use and disclosure of the personal data. Coordinate and cooperate with the Regulator where there are problems of the personal data undertaken by the Company and/or the Outsource Agency. Report any problems when performing the duties to CEO directly.

In the event that DPO is unable to perform the roles and responsibilities temporarily, CEO, the person assigned by CEO or the person assigned by DPO shall act on behalf of DPO. The assignment shall be executed in writing.

**4.3 DPC** member consisting of DPO as a Chairperson and committee member whom are selected and appointed from the persons having distinguished knowledge, skills, and experience in the field of Personal Data protection, consumer protection, information technology and communication, social science, law, health/, finance, or any other field that must be relevant to, and useful for the protection of Personal Data.

### **DPC shall have the following roles and responsibilities**

- 1) To ensure the Company provides appropriate security measures for preventing the unauthorized or unlawful loss, access to, use, alteration, correction or disclosure of Personal Data, and such measures must be reviewed when it is necessary, or when the technology has changed in order to efficiently maintain the appropriate security and safety and also to comply with the Law, or the minimum standard specified and announced by the Committee.
- 2) To advice and control where the Personal Data is to be provided to the Outsource Agency or third party, apart from the Company to prevent from using or disclosing such personal data unlawfully or without authorization.
- 3) To put in place the examination system for erasure or destruction of the Personal Data when the retention period ends, or when the data subject right has request to or withdraws consent unless retained for legal purposes.
- 4) To advice investigation result and appropriate actions when the Regulator orders the Company to submit documents or information including request to make a statement of facts in connection with the subject matter of a complaint related to the protection of the Personal Data under the law.
- 5) To provide advice or consultancy on any operation and for the protection of Personal Data of the Company, in acting in compliance with the law.
- 6) To encourage and take into account of DPO duties implementation by the prescribed law or any assignment from DPO.
- 7) To propose any person to be appointed as DPO and/or committee members of DPC and/or Advisor(s) based on the knowledge or expertise with respect to the Personal

Data Protection and/or the qualifications may define by the Personal Data Protection Law as well as the consent of such persons to CEO for the appointment.

- 8) To appoint a sub-committee to perform any duties or act as assigned by the DPC.
- 9) To acknowledge establishment, revision or termination of RoPA.

#### **4.4 DPC Secretary**

Data Governance and Security Section Head shall take following roles and responsibilities as DPC Secretary.

- 1) To arrange meeting of DPC, prepare the agenda/material, record the minutes and follow-up issues discussed in DPC.
- 2) To support the roles and responsibilities of DPC and conduct any other assignment from DPC.
- 3) To take any other action required by PDPA, related laws or regulators.

#### **4.5 Directors, Chief Executive Officer, Executives and Employee**

Directors, Chief Executive Officer, Executives and Employee are responsible to strictly comply with the Personal Data Protection Management Policy and relevant Internal Rules and Regulations of the Company including keeping confidentiality of the Personal Data known or acquired from the duties. The violation of Personal Data Protection Management Policy shall be considered to be punished according to the Company's Working Rules and Regulations and/or applicable laws.

### **Supplementary**

#### **Revision and Abolition of this policy**

Any significant revision or abolition of this Policy shall be proposed by Corporate Governance Department to the Board of Directors for approval.

#### **Periodic Review of this Policy**

This Policy shall be subject to reviewed annually from the date of enforcement in principle. However, such review may be conducted in any appropriate time in case there is any significant revision or abolition.

This Policy was reviewed without any significant revision, and completely acknowledged by the Board of Directors on 23 May 2024.

#### **Date of Enforcement**

This Policy was considered and approved by the Board of Directors dated 25 May 2023. This Policy shall come into force as of 1 June 2023.