



(Translation)

Privacy Policy

Saha Pathana Inter-Holding Public Company Limited

(Revised Edition 1)

1. Principles and Objectives

Saha Pathana Inter-Holding Public Company Limited (the “Company”) recognizes the importance of personal data protection as a fundamental right which shall be protected by law. Therefore, the Company has established the Privacy Policy to ensure compliance with the Personal Data Protection Act B.E. 2562 (2019), other relevant laws, and international standards related to personal data protection, aligning with principles of good corporate governance and ensuring that all related parties are informed and adhere to this policy.

2. Scope of Enforcement

This Privacy Policy applies to all personal data processing activities conducted by the Company including any individuals who are aware of personal data due to their involvement in the Company’s operations, must comply with the law and this Privacy Policy.

For any personal data collected by the Company prior to the time when the Personal Data Protection Act B.E. 2562 (2019) came into effect, the Company shall continue to collect and use such personal data for the original purposes. Any disclosure or other activities beyond the collection and use of the aforementioned personal data, the Company shall strictly comply with the Personal Data Protection Act B.E. 2562 (2019).

3. Definition

“Company” refers to Saha Pathana Inter-Holding Public Company Limited.

“Person” refers to a natural person.

“Data Subject” refers to an individual person who owns the Personal Data.

“Personal Data” refers to any information related to a Person, which enables the identification of such Person, whether directly or indirectly, but not including the information of the deceased Persons in particular.

“Processing of Personal Data” refers to the collection, use, or disclosure of the Personal Data.

“Data Controller” refers to a Person or a juristic person having the power and duties to make decisions regarding the collection, use, or disclosure of the Personal Data.



“Data Processor” refers to a 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.

4. Collection of Personal Data

The Company shall collect Personal Data based on its sources, purposes, and principles of collection as follows:

4.1 Sources of Personal Data

4.1.1 Collected Personal Data directly from the Data Subject, such as through documents and/or various forms, and/or surveys conducted by the Company, either in paper format or online or usage of the Company’s electronic systems or websites, including data collected through cookies.

4.1.2 Collected Personal Data from other sources apart from collecting directly from the Data Subject, such as retrieval of Personal Data through an electronic systems, websites, or inquiry from third parties, in which the Company shall notify the Data Subject without delays no later than 30 (thirty) days from the date of data collection from such sources. Additionally, the Company shall obtain consent for collecting such Personal Data from the Data Subject unless it is exempt from obtaining consent or notifying the Data Subject as stipulated by the Personal Data Protection Act B.E. 2562 (2019) and other relevant laws.

4.2 Objectives and Principles of Personal Data Collection

4.2.1 The Company shall collect Personal Data only to the extent necessary for lawful purposes, as informed to the Data Subject before or at the time of data collection, such as for the benefit of providing services, improving service efficiency, conducting various audits, analyzing and preparing documentation requested by government agencies or other relevant organizations, supporting the Company’s business operations, managing the Company’s internal administration and the Company’s human resources management. The Company shall obtain explicit consent from the Data Subject before or during the collection of Personal Data, except in the following cases where consent is not required by law:

(1) To achieve the objectives related to the preparation of historical documents, archives for public interest, or for research or statistics, the Company shall implement appropriate protective measures to safeguard the rights and freedoms of the Data Subject.

(2) To prevent or mitigate harm to the life, body, or health of the Person.

(3) Necessary to fulfill the terms of a contract to which the Data Subject is a party, or to take actions at the request of the Data Subject prior to entering into the contract.



(4) Necessary to carry out duties in the public interest by the Data Controller, or for the exercise of the public authority granted to the Data Controller.

(5) Necessary for the legitimate interests of the Data Controller or any other Persons or juristic persons other than the Data Controller, unless such interests are overridden by the fundamental rights of the Data Subject with respect to his or her Personal Data.

(6) For compliance with the law by the Data Controller.

4.2.2 In cases where the Data Subject must provide Personal Data to comply with the law or a contract, or it is necessary to provide Personal Data to enter into a contract, or must provide data in any other way, if the Data Subject does not provide such information, it may result in the suspension or temporary cessation of any transactions or activities related to the Data Subject until the Company receives the Personal Data. This is because the Company will not be able to process such data, or the law may prohibit the continuation of such transactions or activities.

4.2.3 Collecting of sensitive Personal Data; the Company is required to obtain consent from the Data Subject prior to or at the time of collecting the sensitive Personal Data, in accordance with the criteria set forth by the Company which shall comply with the laws.

5. Use and Disclosure of Personal Data

The Company shall use and disclose Personal Data in accordance with the objectives and principles outlined in Clause 4.2, “Objectives and Principles of Personal Data Collection”. The Company may disclose Personal Data to third parties only to the extent necessary, with the consent of the Data Subject, unless such actions is permitted by law. The Personal Data may be disclosed to external persons, organizations, or government agencies as follows:

- (1) Affiliates or group companies of the Company.
- (2) Business partners, contracting party, service providers, business allies, and/or distributors.
- (3) Credit reporting agencies, financial institutions, and/or banks.
- (4) Government agencies with legal authority.
- (5) Other organizations or entities related to or may involve with the Company’s business operations and/or other juristic persons.

6. Retention Period of Personal Data

The Company shall retain Personal Data for the following periods:

- 6.1 For the period required by applicable laws regarding the retention of Personal Data.



6.2 In cases where there is no specific legal requirement for the retention period of Personal Data, the Company shall retain Personal Data only as necessary for the purposes for processing such Personal Data. The Company shall determine the retention period based on the operational needs of the Company.

Once the retention period has expired, the Company shall erase, destroy, or anonymize the Personal Data in such a way that it can no longer identify the individual to whom the data pertains.

7. Personal Data Security

The Company shall implement appropriate security measures to protect Personal Data against theft, breach, loss, unauthorized access, use, alteration, correction, or disclosure or otherwise in violation to laws.

8. Rights of the Data Subjects

This policy has been established to ensure that the Data Subjects can exercise their rights under the Personal Data Protection Act B.E. 2562 (2019) as follows:

8.1 Right to withdraw consent: the Data Subject has the right to withdraw consent for the processing of Personal Data which the Data Subject previously provided to the Company at any time.

8.2 Right to access Personal Data: the Data Subject has the right to request access to the individual's Personal Data and ask the Company to provide a copy of such data, as well as to request information about how the Company obtained Personal Data that the Data Subject did not provide consent for.

8.3 Right to rectify Personal Data: the Data Subject has the right to request the Company to correct any inaccurate or outdated Personal Data or to add information to the incomplete information.

8.4 Right to erase Personal Data: the Data Subject has the right to request the Company to erase the individual's Personal Data under certain circumstances.

8.5 Right to suspend the use of Personal Data: the Data Subject has the right to request the Company to suspend the use of the individual's Personal Data under certain circumstances.

8.6 Right to transfer Personal Data: The Data Subject has the right to request the Company to provide the individual's Personal Data and to ask the Company to send or transfer the individual's Personal Data to another Data Controller or to the Data Subject under certain circumstances.



8.7 Right to object to the processing of Personal Data: The Data Subject has the right to object the processing of the individual's Personal Data under certain circumstances.

The Data Subject may exercise these rights through the channels specified by the Company. However, the Company may refuse the exercise of such rights if there are legitimate grounds. Additionally, the Data Subject has the right to file a complaint with the relevant officials or authorities if the Company or the Data Processor violates or fails to comply with the Personal Data Protection Act B.E. 2562 (2019) or any regulations issued under the Act.

9. Review and Update of the Policy

The Company shall review the Privacy Policy on an annual basis.

10. Contact

Saha Pathana Inter-Holding Public Company Limited

989, Rama 3 Road, Bangpongpan, Yannawa, Bangkok 10120

Tel.: 02-294-9999

Data Protection Officer

989, Rama 3 Road, Bangpongpan, Yannawa, Bangkok 10120

Tel.: 02-294-9999

E-mail: dpo@spi.co.th

This Privacy Policy was approved by the resolution of the Board of Directors' meeting, No. 3 (Board # 33), held on July 16th, 2026 and shall be effective from July 17th, 2026 onwards. The Privacy Policy which was become effective on March 11th, 2022 and approved by the resolution of the Board of Directors' meeting, No. 12 (Board # 28), held on March 10th, 2022, shall be rescinded.

Somkid Jatusripitak

(Mr. Somkid Jatusripitak)

Chairman of the Board of Directors