

 SUTHA	Golden Lime Public Company Limited		
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Policy Notification

Personal Data Protection Policy

Golden Lime Public Company Limited and its subsidiaries (collectively known as “the Company”) recognize and respect the privacy of Personal Information (as defined below). Therefore, the Company has established a Personal Data Protection Policy (“this Policy”) to govern its actions in relation to the collection, use and disclosure of Personal Information in compliance with Personal Data Protection Act, B.E. 2562 (2019) and in practices as follow:

1. Scope and descriptions

1.1 Scope of obligations

The Personal Data Protection Policy according to the Personal Data Protection Act B.E. 2562 and relevant laws cover all the processing of personal data carried out by the Company including any individuals who know personal information in connection with the Company's operations shall comply with this Privacy Policy following the framework prescribed by laws.

The personal data prescribed by the Company includes the followings;

- Operation staff, including employees, employed staff, job applicants, trainees
- Company’s customer means natural persons. Corporate customer means only personnel i.e. employees, officers, representatives, authorized representatives, directors and other natural persons acting on behalf of corporate customers.
- Traders or partners, third party service providers: This covers only the personal data of natural persons which is a trader, partner, external service provider The Company's past, present, and possibly traders or trading partners, external service provider and

employees, personnel, officers, representatives, agents, authorized representatives to act on behalf of juristic persons, directors and other natural persons acting on behalf of merchants or business partners, external service provider, contractual parties who are legal entities of the company.
- Director, authorized director to sign on behalf of the company, representative, shareholder representative or any other person having a similar relationship of a legal entity with a relationship to the Company.
- The Company’s shareholders or proxy or shareholders of the subsidiaries company.

1.2 Description

The Characteristics of Personal Data

In this document:

“Personal Data” means any information relating 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.

Sensitive Personal Data means Personal data that is a person's inherently private matter, anyhow, it is considerably sensitive and prone to being used in unfair discrimination and also classified as sensitive personal data by law according to Article 26 of the Personal Data Protection Act B.E. 2562 and as announced by the Personal Data Protection Committee such as racial, ethnic origins, political opinions, cult, religious or philosophical beliefs, sexual orientation, criminal records, health data, disability, trade union information, genetic data, biometric data (such as fingerprints or facial recognition data)

1.3 Personal Data to be collected

The Company collects personal data purposively by lawful and fair means. The collection will be done only to the extent necessary for the operation of the Company's objectives. The Company will expressly obtain consent via either electronically or any suitable method from the data subject prior to collection. In the event that the company collects sensitive personal data of the data subject, the Company will expressly obtain consent from the data subject prior to collection unless the collection of personal data and sensitive personal data is subject to exceptions as specified by the Personal Data Protection Act B.E. 2562 or other laws.

2. The respect of Personal privacy

The Company respects Data Subjects' right of their Personal Data and is also aware of the Data Subjects' intention for the due protection of their Personal Data. Any Personal Data submitted to the Company will be used only for the stated purposes. The Company has strict security measures and a prevention not to let the unauthorized parties from accessing and using your personal data.

3. The Collection of Personal Data

The Company shall collect personal data following the purpose, scope, lawful and fair methods as it deems necessary as defined in the scope of the Company's objectives. Accordingly, the Company shall inform the Data Subject to acknowledge and consent via electronic or other means as specified by the Company. In case the Company needs to collect sensitive data, the Company shall request explicit consent from the Data Subject prior to Data collecting unless the collection of personal data and sensitive personal data is subject to exceptions as specified by the Personal Data Protection Act B.E. 2562 or other laws.

4. Purposes for the collection, use of Personal Data

The Company shall collect or use personal data for the purposes or activities such offering quotes for goods and services , procuring/sourcing/hiring, contracting, financial transactions, Human resources operations, activities related to the Company, collaborations or improvement of the Company's processes; database administration, company's process analysis and development, and/or any other purposes which are in compliance with the legal obligations or regulations to which the Company are subject. Company shall retain and use the Personal Data only for as long as is reasonably necessary for the above-mentioned purposes for which it was collected or to comply with any applicable legal requirements.

Company shall not conduct any processes other than the purposes as have previously been informed to the Data Subject except:

- (1) The Data Subject has been informed of such a new purpose, and the consent is obtained;
- (2) It is obligatorily in compliance with the Personal Data Act. or other relevant laws

5. The Personal Data retention period

The Company will retain your Personal Data only for the necessary duration, and will collect, use and disclose your Personal Data, as defined in this Policy, in accordance with the duration criteria, namely the period during which you are still related to the Company as a client, and may still retain your Personal Data as long as needed for legal compliance or as per legal prescription, for the establishment of legal claims, legal compliance or exercise of legal claims, or defense of legal claims. The principal laws that are used specifically for the retention of personal information are the Accounting Act B.E. 2543, the Anti-Money Laundering Act B.E. 2542, and the computer-Related Offenses Act, B.E. 2007 Revenue Code or raising the defense of legal claims or for other reasons according to the company's internal policies and requirements. In the event that the law does not specify a specific period for the retention of personal data, the retention period will be determined as long as it is necessary for the sake of the Company's proper operations.

6. Security Measures and Direction of Personal Data Protection

The Company establishes suitable security measures to protect personal data in accordance with the laws, regulations, rules and practices of personal data protection for the Company's employees and other related parties including supporting and encouraging employees to be knowledgeable and aware of their duties and responsibilities in collecting, storing, using and disclosure of the data subject's personal data. The Company's employees shall comply with the policy and personal data protection practices as prescribed by the Company to ensure the Company proper and effective compliant with the privacy policy and law as well as follow Information Technology Security Policy of the Company to prevent Personal Data, loss, illegal access, destruction, alteration, correction and to prohibit unauthorized or unlawful use of Personal Data.

7. Your Rights as a Data Subject

As a Data Subject, you have the rights as prescribed in the Personal Data Protection Act, B.E. 2562 (2019) and other rights as follows:

7.1 Right to be informed

You have the right to be informed of the details and purposes of data collection, use or disclosure of personal data as a data subject prior to or at the time of collection. The data subject has the right to know what data will be stored including storage period, location, and methods and means of contacting the company including the right to be notified of any changes.

7.2 Right to withdraw consent

You have the right to withdraw consent for the processing of your Personal Data as submitted to the Company, but not if the consent withdrawal is restricted by law or by contract of benefit to you as a Data Subject. However, the withdrawal of consent shall not affect the processing of Personal Data to which you have already legally consented.

7.3 Right to access to the Personal Data

You are entitled to request access to and obtain a copy of your Personal Data, under the Company's care and responsibility, as well as to request the disclosure of the acquisition of your Personal Data without your consent.

7.4 Right to request for sending or transferring the Personal Data (Right to data portability)

You have the legal right to request the Company to transfer your Personal Data.

7.5 Right to object to the collection, use, or disclosure of Personal Data

You have the right to object to the processing of your Personal Data, in certain circumstances, namely the collection, use, or disclosure of your Personal Data as prescribed by law.

7.6 Right to request the erasure of Personal Data (Right to be forgotten)

You have the legal right to request the Company, in certain circumstances, to erase, destroy, or to anonymize your Personal Data.

7.7 Right to restrict the use of Personal Data.

You have the legal right to request the Company to suspend the use of your Personal Data.

7.8 Right to request for the correction of the Personal Data

In case you discover that your Personal Data kept by the Company is not correct or has been modified, you have the legal right to request the Company to correct them and inform such corrected data to you as a data subject so that your Personal Data is accurate, up-to-date, complete, and will not incur any misunderstandings.

7.9 Right to Complain

You have the right to complain to authorized officials as prescribed by the Personal Data Protection Act, B.E. 2562 (2019) in case of the Company's infringement or non-compliance with the Act.

The data subject to the personal data can exercise the above right by submitting a request to the Company in writing or via e-mail in the form (DSR Form) specified by the Company. To exercise the rights and contact details are written in "Personal Data Protection Policy "published on the Company website https://www.goldenlime.com หรือ http://www.irplus.in.th/Listed/SUTHA/pdf/SUTHA_Personal_Data_Privacy_Policy_EN.pdf	Download DSR Form EN version 
The Company will consider and notify the result of the request to the data subject within 30 days from the date of receipt of such request or as obliged by law. In this regard, the Company may reject the request of the personal data subject in the event that it is required by law.	

8. The Disclosure of Personal Data to a Third Party

The Company shall not disclose personal data of the Data Subject without the consent of the Data Subject and shall disclose it solely for the above-mentioned purposes. However, for the benefit of

company operations and service provision to the Data Subject, Company may disclose personal data to the subsidiaries or others residing domestically and internationally, such as major shareholders, service providers who are depts to deal with personal data. Under this disclosure, the Company shall govern the above-mentioned persons to treat the personal data confidentially and not to use the data for purposes which are not prescribed in prior notifications.

The Company may disclose personal data of the Data Subject as required by laws and regulations, such as disclosing to a government agency, state enterprise, regulator including disclosure under legal enforcement such as requests for the purposes of litigation or prosecution or requests made by the private sector or other persons involved in the legal proceedings.

In the case of the transfer of personal data of the personal data subject residing in the European Union / European Economic Area to the Company or the transfer of the personal data of the data subject to the countries of the European Union / European Economic Area as needed by mean of business, the Company will take steps to ensure that such transfers of data are in accordance with the General Data Protection Regulation (GDPR) requirements of the European Union.

9. Contact channels

Enquires or questions on the Personal Data Protection can be addressed to the following channels:

Contact DPO Team

Golden Lime Public Company Limited

Address: No. 89 Cosmo Office Park, 6th Floor, Unit H, Popular Road, Banmai Sub-district, Pakkret District, Nonthaburi.

Tel: 02-017 7461 – 3

Fax: 02-017 7460

Email: DPO@goldenlime.co.th

10. Amendment of the Policy and Guideline on Personal Data Protection

The Company may, from time to time, review this Policy for compliance with the changing guidelines and relevant laws. In case of changes thereto, the Company will provide a public notification through suitable channels

Personal Data Protection Policy herein informed the Board of Directors Meeting No. 5/2022 held on 10 November 2022 to acknowledge the updated revision.

Mr. Sripop Sarasas



Chairman of the Board of Directors

Description to issue and improve the document

Item	Document number	Issue on	Approved date	Reference the Board of Directors Meeting to approved
1	CS20181101_EN	14 November 2018	14 November 2018	The Board of Directors Meeting no. 5/2018
2	CS20181101_EN (Rev1)	25 February 2021	25 February 2021	The Board of Directors Meeting no. 1/2021
3	CS20181101_EN (Rev2)	24 November 2021	25 February 2022	The Board of Directors Meeting no. 1/2022
4	CS20181101_EN (Rev3)	1 June 2022	10 November 2022	The Board of Directors Meeting no. 5/2022