

	Golden Lime Public Company Limited		
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Notify Policy Practices

Personal Data Privacy Policy for Shareholders

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 Privacy 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)

1. Personal Data

1.1 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 pertaining to 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) or of any data which may affect the data subjects in the same manner, as prescribed by the Personal Data Protection Committee

1.2 The Collection of Personal Data

The Company may collect your Personal Data of Shareholders as follows:

General Personal Data:

- (a) Personal Data including, among others, name and surname, the date and place of birth, marital status, information contained in an individual’s citizen identity card, passport and their copies.
- (b) Contact information including, among others, address, telephone number, social media identification such as Line ID, and workplace contact details.
- (c) Work position, work unit or organization
- (d) Information related to electronic systems access and usage such as email, IP Address, Browsers, Cookies and chat history in various applications
- (e) Other information provided to the Company during company events in which you participated



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

In the direct collection, use, and disclosure of your Personal Data, the company shall solicit your consent should it be legally required and shall use the Personal Data only as necessary and only in accordance with the Company's specified purposes.

However, the Company may collect your Personal Data from any other sources, such as from various social media, but only in necessity and carried out in accordance with legal requirements.

4. Purposes for the collection, use and disclosure of Personal Data

The Company collects, uses, and discloses Personal Data for the following purposes:

- (1) Purposively carrying out the Company's business operations, cooperation and coordination.
- (2) As a database for meetings; meeting appointment, attendance registration, determining the presence of a quorum, counting vote, annual dividend payment, execution of the rights of the shareholders as a result of the shareholders' meeting and/or for the purpose as a shareholder of the Company (if any)
- (3) As a database for coordinating, implementing public relations, the Company news release including the delivery of necessary and relevant documents or information such as the minutes of the shareholders' meeting, annual report, sustainable development progress, financial report, an invitation to the shareholders' meeting, an invitation letter to attend activities etc.
- (4) To obtain opinions of stakeholders of various projects of the Company including preparing reports as required by law or regulatory authorities
- (5) The disclosure or submit the list of shareholders in accordance with the rules and procedures prescribed by the authorities or the capital market regulator, for example, the submission of the list of shareholders which is carried out by the registrar appointed to the Department of Business Development Ministry of Commerce or disclosure of a list of major shareholders in accordance with the Notification of the Capital Market Supervisory Board.
- (6) As a database for the Company's activities such as site visit, social activities (CSR), etc., as well as being used as a database to track progress of the activities/projects organized by the Company
- (7) To record still photos and motion videos of the meeting or event venue to be used in communicating and disseminating to those who were unable to participate, presenting as a media for internal and external public relations
- (8) The Company and subsidiary's internal control systems audit including following up on recommendations, complaints or a claim to prevent corruption and inappropriate behavior, wrongdoing or unlawful acts
- (9) To control the access, to prevent and suppress harm to life, body or health to you and others, to control and prevent communicable diseases to maintain the security of the Company's premises
- (10) To comply with the laws or regulations applicable to the Company now and in the future



The Personal Data collected by the company in relation to the above-mentioned purposes are required in compliance with contractual obligations or in accordance with applicable laws. In case of refusal to provide the required Personal Data, it may be considered as an infringement of relevant laws or may cause the Company not to be able to manage or execute contractual obligations or facilitate services for you.

However, should any modifications to the stated purposes for the collection of Personal Data subsequently occur, the Company will duly inform you as well as fulfill other legal obligations, including the recording as evidence of the amendment of the purposes stated in this Policy.

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 shareholder, 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, or for other purposes in accordance with policies and the internal regulations of the Company.

If it is not possible to specify the Personal Data retention period, the Company will retain the Personal Data as may be expected per data retention standards (such as the longest legal prescription of 10 years) or throughout the time period as a shareholder of the Company.

6. Security Measures

The Company has in place adequate and strict security measures, in accordance with Policy and Guidelines on Information Technology of the Company, to prevent Personal Data, loss, access, destruction, use, 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, in certain circumstances, to request the Company 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.

In the event that the Data Subject lodges their request to exercise their rights as prescribed by the Personal Data Protection Act, B.E. 2562 (2019), upon reception of such request, the company will further proceed within the duration of time as prescribed by the Act. However, the Company reserves the right to deny or not to proceed with the request as prescribed by law in case that the Data Subject has chosen to provide to the Company only certain Personal Data which may cause the Company not to be able to provide full services. Moreover, the Company may not be able to collaborate with or to provide services to the Data Subject if they do not consent to the provision of information as required by the Company.

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> or 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 may have the need to disclose Personal Data to its subsidiary or to other persons or business units that are strategic allies in Thailand or in a foreign country cooperating with the Company in the procurement of various products or services, or out of necessity as prescribed by terms and conditions of the Company, or in case of reorganization, merging or sales of the Company and may require the disclosure of the Personal Data to Thai authorities or Public Organizations concerned as prescribed by law or by court order or by the order of authorized officials for which the Personal Data will be kept confidential, either in paper form or electronic form, including during its transfer.

However, in case of an international transfer of Personal Data, the Company will strictly comply with the Personal Data Protection Act, B.E. 2562 (2019).

9. Data Protection Officer

The Company has complied with the Personal Data Protection Act, B.E. 2562 (2019) by appointing a Data Protection Officer (DPO) to review the Company's collection, usage and disclosure of Personal Data for conformance with the Personal Data Protection Act, B.E. 2562 (2019) including other related laws. The Company assigned the responsible persons as follows;

9.1 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

9.2 Data Processor - 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 herein means business partners, persons, external companies/agencies engaged by the Company

9.3 Data Protection Officer – a representative of the Data Controller and Data Processor who operates in relation to the advisory, management and verify the Personal Data in compliance with the Personal Data Protection Act 2019

10. Contact channels

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

	Data Protection Officer Team (DPO)
	Golden Lime Public Company Limited
Address:	89 Cosmo Office Park, 6th Floor, Unit H, Popular Road, Banmai, Pakkret, Nonthaburi 11120, Thailand
Tel:	02-017 7461 – 3
Fax:	02-017 7460
Email:	dpo@goldenlime.co.th

And for changes in information on shares traded through securities, you can submit a change request by contacting directly at:

**Securities Registrar**

Company Name : Thailand Securities Depository Co., Ltd.
 Company Address : The Stock Exchange of Thailand Building
 93 Rajadapisek Road,
 Dindaeng, Bangkok 10400
 Telephone 0-2 009 9385 Fax 0-2009 9476

11. 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 appropriate channels

as on February 28th, 2023

(Mr. Geza Email Perlaki)

Managing Directors

Description to issue and improve the document

Item	Document number	Effective on	Approved/Reviewed	Objective
1	CS20181101_PM02	24 November 2018	1 December 2021	To notify, to publicize to all stakeholders to acknowledge
2	CS20181101/WI05	1 June 2022	10 November 2022	
3	CS20181101/WI05	28 February 2023	28 February 2023	