

## **Privacy Notice For Shareholders and Directors**

Matching Maximize Solution Public Company Limited and group of companies (hereinafter collectively referred to as the “the Group”) pledges to protect the personal data of shareholders and directors (hereinafter collectively referred to as “You”) in accordance with the Personal Data Protection Act 2019.

This notice is to inform that the Group is designated as a “data controller” under the Personal Data Protection Act 2019, whereby it collects, uses, or discloses your personal data.

In order to comply with the duty to inform the personal data subject of the purpose for the legal collection of personal data, the collection period, disclosure of the personal data, information about the Personal Data Controller, and the rights of the data subject, in accordance with the Personal Data Protection Act 2019, the Group therefore issues this privacy protection policy notice to inform its shareholders and Company directors of the nature and reasons for collecting, using, and disclosing personal data.

This privacy protection policy notice is issued in accordance with Section 23 of the Personal Data Protection Act and is published by Matching Maximize Solutions Public Co. Ltd. and the companies listed in the attachment to this notice, with the exception of any company that has published its own privacy protection policy notice in accordance with Section 23 of the Act, in which case the details of such policy will be in accordance with said notice.

The Group may make amendments to this notice as deemed appropriate and will announce any such revisions or changes. This policy notice is effective from the date of its announcement.

### **1. Personal data that the Group will collect**

Personal data means any information about an individual that makes it possible for said individual to be identified, whether directly or indirectly, excluding any information about deceased persons. The Group collects your personal data as follows:

#### **1.1 Personal data:**

- (1) The Group collects personal data about shareholders, including persons with power of attorney and proxies, such as name, surname, address, telephone number, email address, nationality, occupation, date of birth, tax ID number, ID card number, passport number, bank account number, number of shares held, share certificate numbers, shareholder registration number, file or copy of any document verifying the shareholder’s identity, payment and receipt of dividends, including any personal information about legal acts performed as a shareholder of the Company.

(2) The Group collects personal data about directors and persons nominated as directors as follows:

(a) During the recruitment process, the Group will collect personal data from ID card, passport, or documents issued by government agencies of any country that can be used to verify identity such as name, surname, sex, ID card number, passport number, photograph, date of birth, nationality, place of birth, height.

(b) For persons holding directorship positions, additional personal data will be collected, such as compensation, training, activities, marital status, information about spouse or those living together in a domestic partnership, children, siblings, blood type, bank account numbers, email address, educational background, occupation, work history, directorship history, or other positions held in a company or other business, attendance at directors', sub-committee or shareholders' meetings, director's remuneration, securities holdings, performance as director, term of directorship, registration of directorship, and other information pertaining to relevant laws.

(3) Information on usage and access of information systems, computers, work systems, websites, applications, network systems, electronic equipment, and email systems, to comply with the Group's information technology policy and relevant laws.

(4) When You participate in any activities of the Group, the Group may collect additional personal data with your consent, on a case-by-case basis.

(5) When you enter the premises of the Group where closed circuit cameras are installed ("CCTV cameras"), the Group may collect your image from the CCTV cameras. However, the Group does not collect audio data from the CCTV cameras, and will post signs informing that closed circuit TV cameras operate in the area of the Group. (This applies only to companies within the Group that have installed CCTV cameras).

1.2 Sensitive personal data (Sensitive Data) such as health information, food allergies, drug allergies, to process in relation to activities that you may attend or participate in. In such cases, the Group will obtain your consent on a case-by-case basis and will use its best efforts to provide adequate security measures to protect your sensitive personal data.

## **2. Purpose of processing personal data**

2.1 For the execution of contracts with the Group to which the shareholder or director is a party.

2.2 To comply with the law, for example company management (such as establishing a company, increasing or reducing capital, restructuring, changes in registration), shareholders' meetings, nominations and directorships, Board of Directors meetings, management of rights and duties of directors and shareholders, payment of dividends, organization of accounts, reports, audits, statutory documents, delivery of documents or other printed materials, including various legal requirements relating to being a limited company.

- 2.3 For the legal interests of the Group or other persons, for example management of the company; video recording including audio of meetings; records of attendance at meetings; minutes of meetings; security purposes; organization of events; or sending of news or offers to shareholders or directors, including to exercise legal claims.
- 2.4 To prevent and minimize danger to the life, person, or health of You or others, such as emergency contact details, and the control and prevention of communicable diseases.
- 2.5 For the performance of duties for the public benefit or in exercising powers granted to the Group by the state.
- 2.6 In the event that You give your consent, the Group will process your personal data. The Group will inform You and request your consent from time to time. You can find out more about the details of consent in Article 4 of this policy notice.

### **3. Changes in the purpose of processing personal data**

The Group will use your personal data only for the purposes for which it was collected. In the event that the Group needs to use your personal data for other purposes it will notify You as soon as possible.

### **4. Asking for consent and possible effects of withdrawing consent**

- 4.1 In the event that the Group collects and processes your personal data with your consent, You have the right to withdraw such consent at any time. Such withdrawal of consent will not affect any information collected, used, disclosed, or processed prior to consent being withdrawn.
- 4.2 If You withdraw the consent previously given to the Group or refuse to provide certain information, this may affect the Group's ability to fulfill some or all of the objectives as described in this policy notice.

### **5. How your personal data is collected**

The Group collects your personal data directly, including from government agencies, supervisory authorities, and publicly disclosed information. The Group collects information about your use of its websites via cookies (please refer to the Cookies Policy of each company within the Group whose website you accessed).

### **6. Disclosure of your personal data to others**

- 6.1 The Group may disclose and share your personal data with:
  - (1) Companies within the Group as listed in the attachment, and
  - (2) Other persons and juristic persons not belonging to the Group ("Other Persons") for the purposes of collecting and processing personal data as outlined in this policy notice, for example government

agencies such as the Ministry of Commerce, the courts or persons involved in litigation, relevant service providers such as meeting organisers, financial institutions, professional service providers, and other persons as required to be able to carry out the purposes of collecting and processing personal data as described in this policy notice.

6.2 The Group requires that any persons receiving information from the Group take the necessary measures to protect your personal data; and only process such data as required, taking the necessary steps to prevent the unauthorized use or disclosure of personal data.

## **7. Transfer of personal data abroad**

7.1 In the event that it is necessary the Group may transmit or transfer your personal data to a company within the Group located in a foreign country to comply with the terms of any contract to which You are a signatory; or in accordance with a contract between the Group and an individual or juristic person for your benefit; or for the processing of a request from You prior to entering into a contract; or to protect or minimize danger to the life, person or health of You or others; or to comply with the law; or as is necessary to meet the needs of the public interest.

7.2 The Group may retain your data on computer servers or cloud services provided by third parties, and may use the programmes or applications of third parties in the form of software or platform services to process your personal data. However, the Group will not allow unrelated persons to access your personal data, and will require the third party service providers to maintain adequate security measures.

7.3 To protect your personal data sent overseas, the Group has established a policy to protect data sent or transferred overseas by sending it to the personal data controller or personal data processor employed by the Group located overseas.

## **8. Personal data security**

8.1 The Group has implemented technical security measures to protect personal data. It prevents personal data being accidentally lost, accessed, disclosed, or altered unlawfully, or without the necessary authority.

8.2 The Group provides appropriate security measures, and access to your personal data by employees, representatives, contractors, or third parties is limited. The Group will only allow persons who need access to be able to perform their duties to access the information. In any case where a third party needs to process your personal data, it will be processed in accordance with directions from the Group, and the Group will assign such third parties to be responsible for protecting your personal data and for complying with applicable data privacy protection laws.

## **9. Period of personal data collection**

- 9.1 The Group will retain your personal data for the period of time necessary to achieve the purposes for the relevant category of personal data unless the law allows it to be retained for a longer period. In the event that the period of time cannot be specified, the Group will retain the data for a period that may be reasonably expected in accordance with accepted standards (eg. the general legal practices of up to 10 years).
- 9.2 In the case of closed circuit TV cameras, the Group will retain the data
- (1) in normal circumstances for a maximum period of 60 days;
  - (2) in cases where necessary, such as where the data is required as evidence in an investigation or litigation, or where the personal data subject requests it, the personal data may be retained for a period of more than 60 days, and the Company will delete the data when the objectives have been met.
- 9.3 The Group has established an auditing system to delete or destroy the personal data after the retention period has expired or is no longer necessary for the purposes for which the personal data was collected.
- 9.4 In the event that the Group uses your personal data with your consent, the Group will process the information until such time as You request to cancel your consent and the Group has completed your request. However, the Group will keep your personal data to the extent necessary to keep a record that You have withdrawn consent, so that the Group may respond to your future requests.

## **10. Rights of the personal data subject**

- 10.1 According to the conditions outlined in the Personal Data Protection Act 2019, You have the following rights:
- (1) The right to request to withdraw consent that You have given to the Group to process your personal data.
  - (2) The right to request access to, and to obtain a copy of, your personal data which is the responsibility of the data controller, or to request disclosure of the acquisition of your personal data.
  - (3) The right to send or transfer personal data in electronic format to another personal data controller, in accordance with the Personal Data Protection Act.
  - (4) The right to object to the collection, use, or disclosure of your personal data.
  - (5) The right to request that the personal data controller delete, or destroy, or make anonymous your personal data.
  - (6) The right to request that the personal data controller suspend the use of your personal data.
  - (7) The right to request that the personal data controller ensure that your personal data is correct, up-to-date, complete, and not be a possible cause of misunderstanding.

- (8) The right to complain to the Personal Data Collection Committee in the event that the Group or the personal data processor, including employees or contractors of the Group, violates or fails to comply with personal data protection laws.

The Group will consider the request to exercise such rights and notify the result of their consideration within 30 days of receipt of such request in accordance with the Personal Data Protection Act and related laws.

10.2 You can exercise your legal right by filling in the relevant information and your request in the Request Form, or Withdrawal of Consent Form, on the Group's websites. You may begin to exercise your rights when the section of the personal data protection laws apply to the Personal Data Controller.

#### **11. Information about the Data Controller or Personal Data Protection Officer**

In the event that You have questions about the collection, use, or disclosure of your personal data, You can contact the personal data controller or Personal Data Protection Officer (DPO) via the following channels:

11.1 Personal Data Controller, Matching Maximize Solutions Public Co. Ltd.

Contact address: 305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok.

Tel: 02 669 4200. Email: [dpo@mmsbangkok.com](mailto:dpo@mmsbangkok.com)

11.2 Personal data controllers of each Company within the Group as per the details in the attachment to this policy notice.

Announced on 1 August 2021

## Attachment

### Companies in the Group and Data Controllers

Company and Personal Data Controllers	Contact details for Data Controllers and personal data protection officers
Matching Maximize Solutions Public Co. Ltd.	305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok.  Tel: 02 669 4200
Gear Head Co. Ltd.  -Branch office	999 Moo 2, Bang Bo sub-district, Bang Bo district, Samut Prakan. Tel: 02 940 0787-90  779/34 Pracha Uthit Rd., Samsen Nok sub-district, Huay Kwang district, Bangkok. Tel: 02 691 6394-97
The Studio Park (Thailand) Ltd.  - Branch office	305/12 Soi Sukhothai 6, Sukhothai Rd., Dusit sub-district, Dusit district, Bangkok. Tel: 02 669 4200 999  Moo 2, Bang Bo sub-district, Bang Bo district, Samut Prakan. Tel: 02 940 0787-90