



## **Privacy Policy, Regional Container Lines Public Company Limited and Subsidiaries**

Regional Container Lines Public Company Limited and subsidiaries (hereinafter referred to as the "Company"), have established a Personal Data Protection Policy to know how to proceed with the collection, use, storage, processing, and disclosure of personal data, as well as the rights of personal data subjects under the Personal Data Protection Act B.E. 2562 (2019). Therefore, the company announces policies to protect data privacy with the following details:

### **1. Definition**

**" Personal Data "** means information about a person, which makes it possible to identify that person directly or indirectly, but does not include the information of a particularly decayed person.

**" Sensitive Personal Data "** means information that is genuinely personal to a person, but sensitive and may be vulnerable to unfair discrimination, such as race, race, political opinion, belief in cults, religions or philosophy, sexual behavior, criminal record, health information, disability, labor union data, genetic information, biological data or any other information which similarly affects the owner of personal data as announced by the Personal Data Protection Committee.

**" Data Subject "** means the owner of personal data or personal data owner in which the company processes personal data, including but not limited to shareholders, customers, sellers, subcontractors including directors, executives, employees, personnel, agents, and any persons involved in the company's activities and operations.

**"Processing"** means any action on personal data, whether automated or not, such as collecting, recording, systematic setting, storage, modification, restoration, use, disclosure (by submission, transfer, publication, or making

access to or available by any means), arrangement, combination, blocking or limiting, deleting or destroying.

**"The Data Controller"** means an individual or juristic person who has the authority to make decisions regarding the collection, use, or disclosure of personal data.

**"Personal Data Processor"** means a natural person or juristic person who processes the collection, use, or disclosure of personal data in accordance with the directives or on behalf of the Data Controller. So as to any natural persons or legal entities who conduct as such do not as the data controller.

**"Personal Data Protection law"** means the Personal Data Protection Act B.E. 2562 and the relevant secondary law and includes amended legislation any in the future.

## **2. Collection of personal information**

The company collects personal data for the purpose, scope, and use of lawful and fair means. The company will make it wise for the data subject to recognize, give consent electronically or in accordance with the company's methods. In the event that the company stores sensitive personal data of the data subject, the company will seek the consent of the data subject expressly before collecting it, unless the collection of sensitive personal and personal data is made to the exceptions as required by the Personal Data Protection Act B.E. 2562 or other laws.

Personal information collected by the company under this policy is the personal information of the owner of the personal data in the following categories:

1. Customers include personal information such as first name, last name, date of birth, address, information as specified in the ID card, contact information such as email, phone number, address, social media contact channels. Such data will be included on information about purchases and/or services, such as shopping history, product claim history, complaints Information provided by the data subject when contacting the company or for the company to take care of after-sales service, conducting research and, interviews, financial information, such as bank account number, etc.

2. The contract parties are the professionals and those involved in the business operations of the company, namely individuals who are parties or are affiliated with any contract with the company, which means partners, sellers, suppliers, service providers, consultants, and others in a similar manner with the following information: personal information such as first name, last name, date of birth, photo, ID number, passport number, and any contact information such as email, phone number, address, etc.

3. The company's personnel include individuals who are employees. or any persons working for the company include directors, executives, experts, and individuals who receive salaries, wages, welfare benefits and refer to family members of the company's personnel, with information such as first name, last name, nickname, date of birth, photo, information as specified in the ID card, driver's license number, contact information such as phone number, email address, social media channels, addresses, phone numbers, and business fax numbers, job information such as position, start date, job type, factory/ plant affiliation, education information such as qualifications and health information, etc.

### **3. Source of information**

Personal data of data subjects collected and subject to this privacy policy, whether it is personal information provided directly to the company by the company or the personal data collected automatically from the company owner or the personal data obtained by the company from third parties, the following methods are as follows:

1. Procedures for requesting to purchase goods or applying for the exercise of various rights of the company.

2. From the voluntary of the data subject in term of conducting surveys or interactions by e-mail or other communication channels between the company and the data subject.

3. Collect information from the company's website usage data through the data subject's browser's cookies.

4. Other related information.

#### **4. Data processing purpose**

The company collects or uses the personal data of the data subject for the purpose of the company's operations, such as procurement, employment contract, financial transactions, conducting company activities, liaising or improving the quality of work and otherwise, such as database preparation, analysis and development of the company's operating processes, including for any other purpose that is not prohibited by law and/or in compliance with applicable laws or regulations to the company's operations etc. The company will store and use such information for a period of time only as necessary for the purposes notified to the data subject or as required by law.

The company will not act differently than specified in the purpose of the collection of information, except

1. Inform the data subject on the new purpose and obtain the consent of the data subject.
2. Complying with the personal data protection laws (the Personal Data Protection Act B.E. 2562) or other applicable laws.
3. Other purposes (if any) will be provided in writing.

#### **5. Disclosure of Personal Information**

The company will not disclose the personal data of the data subject to anyone without consent and will disclose it for the purposes provided. However, in order to benefit the company's operations and provide services to data subjects, the company may be required to disclose the personal data of the data subject to its affiliates or other persons at home and in abroad, such as service providers who must perform tasks related to personal data by disclosing personal information to such persons. The company will process those individuals to keep their personal information confidential and not use it for purposes other than the scope specified by the company.

In addition, the company may disclose the personal information of the data subject under the rules required by law, such as disclosure of information to government agencies, government agencies, regulators, including in cases where requests are requested to disclose information based on legal authority, such as requests for information for legal litigation or litigation, or requests from private entities or other third parties relating to legal proceedings.

## **6. Period of Maintain Personal Information**

1. The company will retain the data subject's personal data for the necessary period of time in order to achieve the objectives of each type of personal data, unless the law permits a longer retention period. In the event that the retention period cannot be clearly specified, the company retains the information for a period of time that may be expected in accordance with the standards of collection (Such as a maximum of 10 years of general legal validity).

2. The company provides an audit system to process the deletion or destruction of personal data when the retention period is overdue or irrelevant or exceeds the need for the purpose of which such personal data is collected.

3. In the event that the company uses the data subject's personal information by seeking the consent of the data subject, the company will process such personal data until the data subject has requested the termination of consent and the company has completed the request of the data subject. However, the company will retain the data subject's personal information as necessary for record that you have revoked your consent so that the company can respond to your requests in the future.

## **7. Security System**

For the sake of confidentiality and security of personal data, the company has taken measures by:

The company will impose measures, including measures to secure personal data in accordance with the law, regulations, guidelines and guidelines for the protection of personal data to employees of the company and other related persons, as well as supporting and encouraging employees to have knowledge and awareness of their duties and responsibilities for collection. The company's data subject's collection, use and disclosure of personal data by employees must comply with the company's personal data protection policies and guidelines in order for the company to comply with personal data protection policies and laws correctly and efficiently. In particular, the company conducts review and evaluation of the effectiveness of the personal data treatment system by the internal audit agency.

## **8. Rights of the owner of personal data**

The owner of the personal data ( data subject) has the right to conduct as follows;

1. The right to withdraw consent for the processing of personal data with consent. However, this is revoking consent does not affect the collection, use or disclosure of personal information that has already been given consent.

2. The right to access personal data and request a copy of personal data, including requesting the disclosure of the acquisition of personal data that does not give consent.

3. Right to correct personal information

4. Right to delete personal data

5. Right to suppress the use of personal data

6. Right to transfer personal information

7. Right to object to the processing of personal data

The data subject can request to exercise the above rights by applying for the right to the company in writing or via electronic letter in accordance with the form specified by the company through the "Company Contact Channel" as defined in Article 11. The company may deny the rights of the data subject in the event of a law.

## **9. Review and change of personal data protection policy**

The company may make changes to this privacy policy from time to time to comply with any changes relegating to the data subject's processing of personal data and to comply with any changes in the personal data protection law or other applicable laws. The company will notify of any significant amendments with appropriate channels. However, the company advises to review this privacy policy from time to time.

## **10. Transfer of International Personal Data**

The company operates both domestic and international group subsidiaries, as well as internationally, that may or may have databases in the

countries in which they operate. The company, then, may transfer the data subject's personal information to or within the group to a particular database or to an external partner outside the country. Obviously, because the level of data protection varies around the world, The company will not send the data subject's personal data to its affiliates or to third-party companies other than those with dedicated personal data protection laws unless they offer the same level of personal data protection as the company.

While the company is committed to keeping the data subject's personal information secure, sending information online over the Internet is completely unsafe, the company's personal information is secure. The company, together with its service providers, will take the best safeguards to protect the data subject's data unless Information that personal data of data subjects other than the company's conduct provided is at sole risk to the data subject.

## **11. Company Contact Channels**

If the data subject has any questions about this Privacy Policy or wishes to exercise your rights as required, please contact us. Please fill in the form specified by the company and send it to the company, as well as contact the company by various channels using the following contact details:

Department: Human Resources  
Email: [PDPAContact@rclgroup.com](mailto:PDPAContact@rclgroup.com)  
Tel: 02-2961067

### Contact Address

Regional Container Lines Public Company Limited,  
Department: Human Resources  
27/35 Ratchadapisek Road, 30th Floor, Panjanthani Tower,  
Chongnonsi, Yannawa, Bangkok 10120  
Tel: 02-2961096  
Fax: 02-2961068

This Privacy Policy has been implemented by the Board of Directors and is effective from 1 June 2022 onwards.

Regional Container Lines Public Company Limited