

# Personal Data Protection Policy

## **Basic Principle**

AGC Vinythai Public Company Limited (“AVT”) recognizes the essential importance of the proper and adequate protection of the personnel information of individuals, such as names, addresses, telephone numbers etc., which may lead to distinguish the identities of AVT’s customers, business partners, visitors, employees all other parties concerned with AVT’s business operations (hereinafter collectively referred to as “Personal Data”) and importance of compliance with Personal Data Protection Act. (Thailand) 2019 (PDPA), (Hereinafter correctively “Laws”).

Recognizing its responsibility to society, AVT hereby establishes the following basic policies (hereinafter “Policy”) to protect privacy of individuals and comply with laws and regulations enacted to protect Personal Data while conducting its business activities:

### **1. Scope**

This Personal Data Protection Policy applies to all employees of AGC Vinythai and its subsidiary.

### **2. Responsible person and organization**

In order to promote and ensure compliance with Laws, the responsible person shall be assigned as follows;

*Data Protection Officer:* **Managing Director**

Data Protection Officer shall be responsible for all relevant activities and decisions concerned to Personal Data control to ensure compliance with Laws and Policy and AVT’s regulations (hereinafter “Policy and Regulations”).

### **3. Handling of Personal Information**

AVT shall collect, use, and provide Personal Data through the fair and legal means. in addition, when collecting Personal Data, AVT shall present the purpose, related laws, how and source of collecting Personal data along with acknowledgement or consent if necessary, from the owner (hereinafter “Personal Data Subject”) thereof in accordance with Law’s requirement

*Use within the Scope of Utilization Purpose*

At the time of collecting any Personal Data, AVT shall present the purpose and scope of its use. AVT shall use such collected Personal Data strictly within its originally intended scope of use and limited usage as necessary for business operations.

#### *Use beyond the Scope of Utilization Purpose*

In case Personal has to be used beyond the scope, which was originally presented, AVT shall obtain an authorization from Personal Data Subject to whom such Personal Data relates with regard to the planned use, except as allowed by relevant laws and regulations.

#### **4. Information Security standard and Security Measures to Protect Personal Data**

Personal Data shall be categorized and treated as Confidential Information in accordance with AVT information Security Policy.

When handling such Personal Data, AVT shall develop procedures and put it in place to strictly manage Personal Data to prevent its illegal access, loss, falsification or leakage.

To ensure the appropriate handling of Personal Data, AVT will continue to strengthen and improve internal systems, implement the necessary secure management measures in accordance with technological standards, and perform appropriate internal audit.

#### **5. Information incident and whistle blower**

If the incident (misuse, illegal access, falsification, leakage, use for the purpose which is beyond AVT's business and / or originally intended scope) occurred thereof, the employee who becomes aware of such incident shall follow the guideline which is stated in AVT information Security Policy and inform Data Protection Officer without delay.

When becoming aware of or being alerted to incident, Data Protection Officer shall notify Personal Data Protection Commission within 72 hours in accordance with Laws.

#### **6. Third party Provision**

AVT will not provide Personal Data to any third party unless authorized by Personal Data Subject or allowed by relevant laws and regulations. In addition, when providing such Personal Data to any third party as authorized or allowed above, AVT will conclude a contract with the third party or take any other measures that obligates the third party to be responsible for the management of Personal Data to be provided, thereby preventing its leakage to any other party or other misuse. If any employee would like to disclose any Personnel Data to the third party, he or she shall get prior approval from Data Protection Officer.

## **7. Personal Information Cross border transfer**

Obtaining Personal Data of Personal Data Subject who are EU resident shall be subject to GDPR and AGC group umbrella agreement to which AVT is the party.

## **8. Request for Disclosure etc. of Personal Data.**

AVT will promptly respond to requests from Personal Data Subject to disclose, correct, add, withdrawal of consent and/or delete his or her Personal Data, to the extent required by relevant laws and regulations.

## **9. Processing of personal data**

AVT will not collect nor process Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, previous criminal conviction record or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation with exception of relevant law's requirement.

## **10. Policy Awareness**

AVT will inform of this Policy to all of its directors, offices and employees (including commissioned and dispatched personnel) as well as other concerned parties to ensure that each of them understands the importance of this Policy and conduct him or herself in an appropriate manner to follow this Policy.

## **11. Audit & Monitoring Program**

AVT will perform regular checks and assessments on how the Personal Data we process is obtained, used, stored and shared. The audit program is reviewed against Policies and Regulations to ensure continued compliance

## **12. Disciplinary action**

Employees who infringe on Policy and Regulations will be considered as offence against the company regulation and will punished according to company's regulation.

## **13. Term of execution.**

AVT has the right to amend, revoke, correct part or whole of this policy as deem appropriate.