

- Translation -

AAI – 054 - 2022

**Privacy Policy**  
**(Revised edition B.E. 2566)**

**1. Principles and Objectives**

Asian Alliance International Public Company Limited and its subsidiaries (the “Company”) recognize the importance of personal data and other information concerning the privacy of the owner of the personal data, namely shareholders, directors, employees, partners, suppliers, customers, contractors, activity participants, and/or persons involved in the Company’s business, which is a fundamental right to privacy. In order to ensure that the said persons as the data subjects are fully protected under the Personal Data Protection Act B.E. 2562 (2019) and the Company is transparent and responsible for the collection, use, or disclosure of personal information, this privacy policy has been developed to clarify to the owner of the personal information details about the collection, use, or disclosure (collectively referred to as “Processing”) in order for the data subject to be legally protected against interference with rights or defamation by specifying the nature of the rules for the collection, use, dissemination, processing, transfer, and disclosure of personal information, including persons related to the operator on behalf of or on behalf of the Company.

**2. Scope of Application**

This Privacy Policy applies to the personal data of individuals with current and potential relationships with the Company. Personal data is processed by the Company, its contractual employees, businesses, or other forms carried out by the Company. This includes counterparties or third parties that process personal data on behalf of or on behalf of the Company (personal data processors) under products and services such as websites, systems, applications, documents, or other forms of services controlled by the Company. It means methods by which the Company collects, uses, disseminates, processes, transfers, and discloses personal data. This policy describes the procedures for acting on personal information, and it finally describes the options that the data subjects can choose regarding the disclosure of their personal information acquired from visiting the website [www.asianalliance.co.th](http://www.asianalliance.co.th), directly or indirectly. Protecting and supervising the personal information of the data subject is the trust that the data subject has provided the company and has always been the Company’s priority. Accordingly, the Company collects, uses, disseminates, processes, transfers, and discloses only personal information that is necessary to carry out the Company’s transactional relationship with the data subject. The Company will only retain a person’s data for the duration that the data subject is a shareholder, director, employee, partner, supplier, customer, contractor, or activity participant of the Company.

The Company will regularly review the Company’s Privacy Policy. If the Company changes any material content in this Privacy Policy, the Company will notify the data subjects of such changes through the website [www.asianalliance.co.th](http://www.asianalliance.co.th) by specifying the new effective date to the data subjects so that they can access the website to read and acknowledge the Privacy Policy with new enforcement at all times. In order for data subjects to know this Privacy Policy, the Company therefore announces the Privacy Policy as follows:

Persons in relation to Asian Alliance International Public Company Limited include

- 1) Natural person customers
- 2) Staff, operators, or employees
- 3) Natural person partners and service providers
- 4) Directors, authorized persons, representatives, agents, shareholders, employees, or other persons with the same relationship of juristic persons with relationship to the Company
- 5) Users of the Company’s products or services
- 6) Visitors to or users of the website [www.asianalliance.co.th](http://www.asianalliance.co.th), including other systems, applications, devices, or communication channels controlled by the Company

- 7) Other persons to whom the Company collects personal information, such as job applicants, families of officers, guarantors, and beneficiaries of insurance policies.

Clauses 1) to 7) are collectively referred to as “Data Subjects.”

### 3. Definitions

“**Privacy Policy**” means the policy set by the Company to inform the data subjects about the data processing of the Company and details as determined by the Personal Data Protection Act B.E. 2562 (2019).

“**Personal Data**” means information that can or may directly or indirectly identify the data subject, such as the name, email address, company name, job title, and company address of the data subject. The Company may collect additional personal information about the data subject, such as date of birth, home address, telephone number, user identity for online services (such as social media accounts), marital status, and family details.

“**Sensitive Personal Information**” means information that is purely personal to an individual but sensitive and potentially vulnerable to unfair discrimination, such as race, ethnicity, political opinions, beliefs in cults, religions, or philosophies; sexual behavior; criminal record; health information; disability; trade union information; genetic information; biometric information; or any other information that similarly affects the data subjects as stipulated by the Personal Data Protection Committee.

“**Company**” refers to Asian Alliance International Public Company Limited and its subsidiaries.

“**Affiliate**” refers to a limited liability company that is under the control of the Company in accordance with the Notification of the Securities and Exchange Commission.

“**Personal Data Processing**” means any action taken against personal data, for example, collecting, recording, copying, organizing, retaining, improving, changing, using, restoring, disclosing, transmitting, disseminating, transferring, combining, deleting, and destroying.

“**Data Subject**” refers to a natural person who is the owner of personal data collected, used, or disclosed by the Company.

“**Data Controller**” refers to a person or juristic person who has the authority to make decisions about the collection, use, or disclosure of personal information.

“**Data Processor**” means a person or juristic person that processes, collects, uses, or discloses personal information by order or on behalf of the Data Controller; however, the person or juristic person doing so is not the Personal Data Controller.

“**Personal Data Protection Committee**” means a committee appointed with duties and powers to supervise, issue rules, measures, or any other practices related to the protection of personal data under the Personal Data Protection Act B.E. 2562 (2019).

“**Cookies**” refer to small computer files that temporarily store the personal data needed on the computer of the data subject for the convenience and speed of communication, which are only effective while accessing the website system (a group of data sent from a web server to a web browser and sent back to the web server every time a web browser requests information; cookies are typically used to store small information at the web browser so that the web server can remember the usage status of the web browser towards the web server).

### 4. Roles and Responsibilities

4.1 Roles and responsibilities of the Company under the Personal Data Protection Act B.E. 2562 (2019), in case the Company is the data controller or data processor of the personal data.

Role	Responsibilities
Data Controller	<ul style="list-style-type: none"> <li>● Provide appropriate security measures to prevent unauthorized or unlawful loss, access, use, alteration, correction, or disclosure of personal information, as well as reviewing such measures when necessary or as technology changes.</li> <li>● Take actions to prevent recipients of personal data who are not data controllers from using or disclosing personal data without authority or in violation of the law.</li> <li>● Provide a monitoring system to carry out the deletion or destruction of personal data in accordance with the Personal Data Protection Act B.E. 2562 (2019).</li> <li>● Report the incident of a personal data breach to the Office of the Personal Data Protection Committee and the data subjects without delay.</li> <li>● Record items as required by the Personal Data Protection Act B.E. 2562 (2019).</li> <li>● Provide a Personal Data Processing Agreement between the Data Controller and the Data Processor in the event that the personal data processing is assigned to the Data Processor.</li> <li>● Notify the data subjects and the Office of the Personal Data Protection Committee of information about the Personal Data Protection Officer, contact location, and channels for contact.</li> <li>● Provide for and support the performance of the duties of the Personal Data Protection Officer.</li> </ul>
Data Processor	<ul style="list-style-type: none"> <li>● Collect, use, or disclose personal information only in compliance with the Data Controller's order, unless the order is in violation of the law or the provisions for the protection of personal information under the Personal Data Protection Act B.E. 2562 (2019).</li> <li>● Provide appropriate security measures to prevent unauthorized or unlawful loss, access, use, alteration, correction, or disclosure of personal information.</li> <li>● Report a personal data breach to the Data Controller.</li> <li>● Prepare and retain records of personal data processing activities.</li> <li>● Notify the data subjects and the Office of the Personal Data Protection Committee of information about the Personal Data Protection Officer, contact location, and channels for contact.</li> <li>● Provide for and support the performance of the duties of the Personal Data Protection Officer.</li> </ul>

#### 4.2 Roles and responsibilities of executives, personal data protection officers, staff, and employees of the Company

Role	Responsibilities
Executive	<ul style="list-style-type: none"> <li>● Practice, review and monitor the performance of staff and employees to strictly comply with the Privacy Policy on the personal data protection.</li> </ul>
Staff and Employee	<ul style="list-style-type: none"> <li>● Strictly comply with the Privacy Policy.</li> </ul>
Personal Data Protection Officer	<ul style="list-style-type: none"> <li>● Advise, manage, and monitor operations regarding personal data processing in accordance with the Personal Data Protection Act B.E. 2562 (2019).</li> <li>● Report to the top executive when there is a problem in the performance of duties.</li> <li>● Coordinate and cooperate with the Office of the Personal Data Protection Committee.</li> </ul>

	<ul style="list-style-type: none"> <li>● Report the incident of a personal data breach to the Office of the Personal Data Protection Committee and the data subjects without delay in accordance with the rules established by the Company and without contravention of the law.</li> <li>● Prepare and review the Privacy Policy.</li> <li>● Maintain the confidentiality of personal information that he or she knows or acquires due to the performance of his or her duties.</li> <li>● Perform other duties or tasks without contravention of the law.</li> </ul>
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## 5. Collection of Personal Information

The Company collects personal information, such as individual information, information relating to personal life or personal interests, financial information, and sensitive personal information, with the following sources and principles for collecting personal information:

### 5.1 Sources of personal data

The Company may receive personal information from the following two channels:

5.1.1 Information that the Company collects directly from the data subject in various service channels, for example, the application procedure, registration, job application, signing of contracts, documents, surveys on using products and services, both in paper and online form; questionnaires, or other service channels controlled by the Company, or when the data subject communicates with the Company at the office or through other contact channels controlled by the Company, etc., or accessing the Company's website system through cookies (Cookies).

5.1.2 Information that the Company collects from sources other than directly from the data subject, such as browsing personal information through the website or inquiries from third parties. The Company will notify the data subject without delay, but not later than thirty days from the date the Company collects the personal information from such sources, and will proceed to obtain consent to collect such personal information from the data subject, unless the case is exempt from obtaining consent or notifying the data subject as required by law. The Company may collect personal information, such as:

- Individual information: name, date of birth, nationality, national ID card number or passport number, or other identifiable government document
- Contact information: address, email, telephone number, fax number
- Work history information: professional status, job title
- Information related to the use of the website: username and password for the use of online services and applications, IP address
- Cookies information or from software on the device of the data subject
- Information about marketing surveys: analysis of the marketing statistics of the data subject
- Sensitive information: religious information, health information, criminal records
- Device information and device location information, such as GPS system
- CCTV data
- Conversation and communication by phone or electronic device.

## 6. Principles of Personal Data Collection

6.1 The Company will collect the data of the data subject with the consent of the data subject first, except where permitted by law under the Personal Data Protection Act B.E. 2562 (2019), Article 24, or Article 26, Personal information shall only be collected as necessary for the operation of the Company.

Depending on the case, the Company may have different purposes for processing personal data, such as:

- To enter into and perform a contract between the Company and the data subject.
- To verify the identity or check an individual before providing services or entering into a contract with the Company.
- To answer questions and provide assistance to customers.
- To develop and improve the Company's products to be more responsive to the needs of customers.
- To comply with legal authority related to the Company's operations, such as collecting data for withholding tax and due diligence on customers as part of compliance with the laws of the Revenue Department, the Office of the National Anti-Corruption Commission, the Legal Execution Department, the Office of the Attorney General, or courts.
- To benefit the internal management of the Company, for example, for the payment of salaries and remuneration to its staff, employees, and trainees; for the entry into employment contracts with the Company; for the management of internal personnel; and for the provision of benefits to employees and employees of the Company.

6.2 In the event that the data subject must provide personal data in order to comply with the law or contract, or it is necessary to provide personal data in order to enter into a contract or to provide information for any other purpose, if the data subject does not provide such information, it may result in the suspension of any transaction or other activity related to the data subject until the Company receives the information from the data subject.

This is because the Company cannot process those data or because the law prohibits such transactions or activities from being carried out anymore.

6.3 The Company will collect personal information to the extent necessary for the legitimate purpose notified to the data subject before or at the time of collecting the personal information. The Company will seek the express consent of the data subject before or at the time of collecting the personal information. Except in the following cases, the Company can collect personal information without obtaining consent:

- To achieve the purpose regarding the preparation of historical documents or archives in the public interest or in relation to research studies or statistics, the Company will provide appropriate protective measures to protect the rights and freedoms of the data subject
- To prevent or suppress harm to a person's life, body, or health
- When it is necessary to fulfil the contract to which the data subject is a counterparty or to carry out the request of the data subject before entering into the contract
- When it is necessary to perform duties in carrying out tasks in the public interest or to perform duties in the exercise of state authority delegated to the Company
- When it is necessary for the legitimate interests of the Company or of other persons or juristic persons, unless such interests are less important than the fundamental right to the personal data of the data subject
- To comply with laws such as the Civil and Commercial Code or the Criminal Code.

6.4 To collect sensitive personal data, the Company shall seek the express consent of the data subject before or while collecting such sensitive personal data in accordance with the rules prescribed by the Company, without contravention of the law.

## **7. Rights of the Data Subject Regarding Personal Data**

7.1 The rights of the data subject in this clause are the rights under the Personal Data Protection Act B.E. 2562 (2019) and other relevant laws that the data subject should be aware of. The data subject can request to exercise various rights under the requirements of the law and policies established by the Company before, at the time of, or that will be amended in the future, as well as the rules established by the Company.

7.1.1 Right to withdraw consent: The data subject has the right to withdraw consent at any time throughout the period that the personal data of the data object is with the Company, unless that right is restricted by law or there is a contract that benefits the data subject (whether the consent is given by the data subject before the date the Personal Data Protection Law applies or after).

7.1.2 Right to request access, obtain information, or copy of data: The data subject has the right to request access to or receive its personal data under the responsibility of the Company and to ask the Company to provide a copy of such information to the data subject, including disclosing the acquisition of personal data where the data subject has not given consent to how the Company obtained the data subject's personal data.

7.1.3 Right to object: The data subject has the right to object to the collection, use, or disclosure of the personal data of the data subject at any time, provided that the Company is empowered by law to collect the data of the data subject without first obtaining its consent.

7.1.4 Right to request data correction: The data subject has the right to request correction of his or her personal data to be accurate, up to date, and not misleading.

7.1.5 Right to request deletion or destruction of data: The data subject has the right to request deletion or destruction of his or her personal data or to make the personal data into non-personally identifiable information as follows:

- When the data subject's information is not necessary to be retained for the purposes for which the data subject's information is collected, used, or disclosed
- When the data subject has exercised his or her right to withdraw his or her consent, and the Company has no legal authority to collect, use, or disclose the personal data of the data subject
- When the data subject exercises the right of objection in accordance with Clause 7.1.3 and the Company cannot legally refuse the request
- When the data subject's information has been illegally collected, used, or disclosed.

7.1.6 Right to suspend the use of data: The data subject has the right to request the Company suspend the use of his or her personal data in the following cases:

- When the Company is under investigation as requested by the data subject
- When it is personal data that must be deleted or destroyed, the data subject asks to suspend its use instead
- When the data of the data subject is no longer necessary to retain according to the purpose for which the data was collected, but the data subject is obliged to request retention to be used in settling legal claims, complying with or exercising legal claims, or raising legal claims
- When the Company is in the process of proving the objection request of the data subject in accordance with Clause 7.1.3, consider if the Company has the legal authority to reject the objection of the data subject
- The data subject has the right to request that the Company provide the data subject with data that is correct, current, complete, and not misleading. If the Company does not process the request, it will record the request of the data subject together with the reasons in a document or an electronic system.

7.1.7 Right to lodge a complaint: The data subject has the right to lodge a complaint with the relevant legal authority if the data subject believes that the collection, use, and/or disclosure of his or her personal data is in a manner that violates or fails to comply with applicable laws.

7.1.8 The abovementioned exercise of the data subject may be limited under applicable law, and there are certain circumstances where it is necessary for the Company to deny or is unable to act on the abovementioned requests of the data subject, such as complying with laws or court orders, and exercising rights to infringe the rights or freedoms of other persons.

## **8. Data Retention Period**

The Company will retain personal information for the following periods of time:

8.1 In accordance with the period specified by law relating to the retention of personal information, such as the Computer Crime Act B.E. 2550 (2007) and the Revenue Code.

8.2 In the event that the retention period of personal information is not particularly specified by law, the Company will retain personal information only to the extent necessary to fulfill the purposes for which it is processed. The retention period of personal information will change depending on the purposes for which it is collected and processed.

8.3 Upon the expiration of such retention period, the Company will delete, destroy, or otherwise make personal data non-personally identifiable to the data subject.

## 9. Security and Safety

The Company provides security measures for personal information to prevent theft or personal information breach, loss, access, use, alteration, or correction, as well as unauthorized or unlawful disclosure of personal information, consistent with the Company's information security policies and practices.

If the Company assigns a department or a third party as a data processor to carry out the collection, use, or disclosure of the data subject's personal data on its behalf, such as statistical analysis, the Company will provide an agreement with each other to control the performance of the data processor's duties by requiring the data processor of such personal data to keep the personal data confidential and maintain the security of such personal data, including preventing the use of the personal data for collection, use, or disclosure for any other purpose without authority or contrary to the law.

## 10. Disclaimer

The Company reserves the right to refuse a request under Article 7 in the following cases:

- 10.1 The law requires that action be taken.
- 10.2 Personal information is anonymized or unidentifiable to the data subject.
- 10.3 The applicant has no evidence that he or she is the data subject or is authorized to submit such a request.
- 10.4 Such requests are unreasonable, for example, where the requestor has no legal rights or does not have such personal information with the Company.
- 10.5 Such requests are extravagant, such as requests of the same nature or content repeatedly without reasonable cause.

## 11. Personal Data Protection Officer

The Company has appointed a Personal Data Protection Officer to review, supervise, and advise on the collection, use, or disclosure of personal information, as well as coordinating and cooperating with the Personal Data Protection Committee to comply with the Personal Data Protection Act B.E. 2562 (2019).

## 12. Penalties for Non-Compliance with the Privacy Policy

Failure to comply with the policy may result in an offense and disciplinary action in accordance with the Company's regulations (for personnel or operators of the Company) or in accordance with the personal data processing agreement (for data processors), depending on the relationship that the data subject has with the Company and on a case-by-case basis. It may be subject to penalties as prescribed by the Personal Data Protection Act B. E. 2562 (2019) and relevant laws, regulations, and orders.

## 13. Revision of the Privacy Policy

The Company will revise this Privacy Policy as it deems appropriate to reflect changes in the laws and the Company's operations and may update it to reflect comments and suggestions from the data subject. The Company will make clear notices prior to the commencement of the action or may send notices directly to the data subject through the Company's communication channels or the website [www.asianalliance.co.th](http://www.asianalliance.co.th) with the effective date of each revised version.

After the enforcement of the new policy, it constitutes acknowledgment of the terms of the new policy, so the data subject should stop accessing it. If the data subject disagrees with the details in this policy, please contact the Company to clarify the facts.

#### 14. Transmission or Transfer of Personal Data Abroad

In the event that the Company transmits or transfers personal information to a foreign country, the Company will take actions to ensure that the destination country has adequate standards of personal data protection.

However, in the event that the destination country lacks adequate personal data protection standards, the transmission or transfer of such personal data must be consistent with the Company's rules-based exceptions, without contravention of law.

#### 15. Contact for Inquiry or Exercise of Rights

If you have any questions, suggestions, or concerns about the collection, use, and disclosure of personal information by the Company or about this policy, or if you wish to exercise your rights under the personal data protection law, the data subject can contact:

##### 1) Data Controller

- Name: Human Resources Department
- Contact Location: No. 8/8 Village No. 3, Rama 2 Road, Ban Bo Subdistrict, Mueang Samut Sakhon District, Samut Sakhon
- Contact Channel: [www.asianalliance.co.th](http://www.asianalliance.co.th)
- Call Center: 034-845575-91 extension 5310, 5340

##### 2) Data Protection Officer

- Name: Information Technology Department
- Contact Location: No. 8/8 Village No. 3, Rama 2 Road, Ban Bo Subdistrict, Mueang Samut Sakhon District, Samut Sakhon
- Contact Channel: [www.dpo@asianalliance.co.th](mailto:www.dpo@asianalliance.co.th)
- Call Center: 034-845575-91 extension 5512, 4015

##### 3) The Personal Data Protection Committee

###### consisting of

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|---|----------------------|
| 1. Managing Director of the Company                 | Chairman             |
| 2. Accounting/Finance Manager or Representative     | Committee            |
| 3. Internal Audit Manager or Representative         | Committee            |
| 4. Information Technology Manager or Representative | Committee            |
| 5. Special Advisor                                  | Committee            |
| 6. Legal Manager or Representative                  | Committee/ Secretary |

Contact Location: No. 55/2 Rama 2 Road, Bang Krachao Subdistrict, Mueang Samut Sakhon District, Samut Sakhon Province

- Contact Channel: [www.asianalliance.co.th](http://www.asianalliance.co.th)
- Call Center: 034-845575-91 extension 5310, 5340

This policy only applies to companies and subsidiaries operating in Thailand.



This policy was considered and approved in the Board of Directors Meeting No. 5/2023, dated 8 November 2023, which shall come into effect from 8 November 2023 onwards.

**-Mr. Vichai Assarasakorn -**

(Mr. Vichai Assarasakorn)

Chairman of the Board

Asian Alliance International Public Company Limited