

Privacy Policy

THAINAMTHIP

Document No : PB-COM-005

Effective Date : 3 March 2025

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About this Privacy Policy

ThaiNamthip Corporation Public Company Limited (“**THAINAMTHIP**”) is always committed to conducting its business under good corporate governances and contributing to social responsibilities. THAINAMTHIP recognizes the importance of protection, infringement, access control and leakage prevention of personal data.

The purpose of this policy is to build and maintain data subject’s trust and confidence by ensuring that their data is appropriately processed, and governed by protective measures adopted, by THAINAMTHIP that meet international standards.

For clarity, this policy applies when THAINAMTHIP acts as a controller of the personal data only. In case that THAINAMTHIP is the processor or service provider of the personal data in any activities, the data subject may check the details of such processing activities from the privacy policy or notice of processing of THAINAMTHIP or organization who is the controller of the personal data for those activities directly.

In addition to this policy, THAINAMTHIP has implemented separate corporate privacy policy applies to our employees, vendors, business partners and other associated persons who involves with or performing the works on behalf of THAINAMTHIP, in order to set out rules on processing of personal data, which is under the possession of THAINAMTHIP, vendors and business partners.

Collection of Personal Data

THAINAMTHIP may, directly or indirectly, collect your personal data from the following sources:

- Data subject, his representative or other related persons;
- Subsidiary of THAINAMTHIP;
- Business partners of THAINAMTHIP, such as Coca-Cola (Thailand) Ltd., other companies within the Coca-Cola product group, Swire Coca-Cola, or affiliated companies. ;
- Third party service providers such as telephone service (Call Center) operator, recruitment agency, sale promotion organizer, vender service provider, or press agency;
- THAINAMTHIP’s services through various channel including telephone service (Call Center), and e-mail;
- THAINAMTHIP’s digital services including website, application or social medias;
- Any reliable sources such as governmental organization, governmental body, private organization, association or foundation;
- Seminars, training workshops, exhibitions organized either by THAINAMTHIP, governmental or private sector including social media; and
- THAINAMTHIP’s marketing and social activities such as lucky draw, scholarship and social services.

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Types of Personal Data Collected by THAINAMTHIP

Depending on purposes of use and requirement of the officers in processing personal data, THAINAMTHIP may collect various types of your personal data including:

- Identification information (such as date of birth, and details on ID card, passport or driving license);
- Contact information such as name, address, telephone number, email address, fax number;
- General information such as age, sex, marital status, occupation;
- Financial information such as bank account and tax information;
- Customer satisfaction survey on products and services of THAINAMTHIP;
- Social media information such as LINE, FACEBOOK including behavior, comments or any activities and communication with THAINAMTHIP through social media;
- Vehicles information such as car and motorcycle registration number;
- Information relating to computer devices and programs used by data subject including IP address, types of browser, language, operating system, application, website usage history and Cookies;
- Biometric data including fingerprints;
- Pictures and video including surveillance camera footage;
- Voice recorders via telephone including comments or complaint, or other activities which you communicate with THAINAMTHIP via telephone; and
- Medical records and health check-up result.

Retention Period

THAINAMTHIP will retain your personal data as long as it is necessary for the purpose of data processing. After that, THAINAMTHIP will erase and destroy your personal data except as may be required, by applicable laws, or for protection of THAINAMTHIP's interest. In general, personal data will be kept for a maximum period of 10 years or otherwise longer if it is specifically provided by law.

Purposes of Use and Disclosure

THAINAMTHIP will use and disclose your personal data for the following purposes:

- For customer or agency registration in entering into business relating to the sales of THAINAMTHIP's products;
- Manage, confirm, and proceed in relation to the purchase order, or any services carry out by THAINAMTHIP;
- Support additional services provided by THAINAMTHIP such as issuing financial credit, or services relating to the cold drink equipment;

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- Direct or indirect performance of its contractual obligations;
- THAINAMTHIP's business operations where it has a legitimate interest and data subjects' fundamental rights are not overridden;
- Development improvement and maintenance of the quality of products and services of THAINAMTHIP;
- Conduct satisfactory survey including receive comments and/or complaint in relation to the quality of products and services of THAINAMTHIP, and provide support or remedies the damages;
- Communication (such as notification services, response to your request);
- Offer of products and services through various channels such as tele-sale or social media In case where you no longer wish to be contacted for marketing of sales activities, you could opt-out through designated channels such as email, website or THAINAMTHIP's personnel who directly contact data subject;
- Ensuring the security and safety measures of THAINAMTHIP;
- Ensuring that the content on THAINAMTHIP's website will be provided to you and shown on your electrical devices efficiently;
- Verification of a visitor as part of our security measures;
- Process and receipt of payments;
- Assessment and management of requests;
- Prevention and investigation of forgery;
- A market research and research for the development of THAINAMTHIP's products and services;
- Inspection, analysis and preparation of documents upon request of governmental organizations and regulatory bodies;
- Compliance with applicable laws;
- Invitation to training courses, seminars, receptions or any other events organized by either government or private sector where THAINAMTHIP hosts or participates in;
- Evaluation of feedback from those attending the seminars or social events held by THAINAMTHIP including prepare the report of such event;
- Organize sale promotion event such as lucky draw, points collecting rewards; social media sale promotion including delivery of rewards;
- Publication of news and advertising media of THAINAMTHIP through various channels such as printed matter, television and social media;
- Support and remedies the damages which may arising to the data subject from the works and/or services carry out by THAINAMTHIP;
- To verify the data subject when working within THAINAMTHIP premises; and
- To conduct as necessary to fulfill the purposes of public offering, merger, reorganization, joint venture, sale, purchase, disposal or management of whole or part of business of THAINAMTHIP.

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THAINAMTHIP will process personal data in strict compliance with applicable laws. In case where you have given a consent to any data processing activity, you may withdraw your consent at any time.

Disclosure

THAINAMTHIP will not disclose your personal data without any lawful basis. Your data may be disclosed, or transferred to governmental organizations, governmental bodies or third parties including:

- Companies other than THAINAMTHIP's subsidiaries;
- Local and oversea business partners within Coca-Cola group;
- Other business partner such as stores, restaurants, or distributors;
- Third party service providers such as cloud service provider, software service provider, security service provider, market analysis service provider, sales promotion organizer, logistics service provider etc.;
- Advisors (such as financial advisors or legal advisors);
- Governmental and regulatory bodies;
- Insurance company in case of traffic accident which THAINAMTHIP is a parties;
- Other data controller to whom you have previously disclosed or transferred data; and
- Investors or potential investors for THAINAMTHIP's business.

In case of THAINAMTHIP is required to disclose your personal data to a third party, THAINAMTHIP will follow appropriate procedures to ensure that the third party will properly handle your personal data properly in order to prevent data loss, unauthorized access, and improper use, modification, disclosure or processing.

Cross-Border Transfer

THAINAMTHIP will disclose your personal data to the recipient outside of Thailand only where it is permitted by data protection law or other applicable laws.

Accuracy of Personal Data

THAINAMTHIP will take necessary precautions to ensure that collected personal data is accurate, complete and kept up to date.

Data Security Measure

THAINAMTHIP adopts the high-standard security system in both technology and procedures to prevent any possible data theft. THAINAMTHIP implements various measures to protect its computer system such as, Data Loss Prevention, Firewall, Endpoint Security, Log and Security Monitor (SOC), Vulnerability Assessment, and Penetration Test, though substantial investments, effort and human resources as to ensure that

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THAINAMTHIP achieves high-standard measures and your personal data remains safe.

Although THAINAMTHIP makes its best efforts to protect personal data with our technical mechanism along with the management by our personnel to control access and keep personal data against unauthorized access, THAINAMTHIP cannot always guarantee the security and confidentiality of personal data from every incident that may arise, such as virus threat and unauthorized access. A data subject should regularly keep up with technology news, install personal firewall software to prevent his computer from threat or data theft. Also, monitoring own account on a regular basis (such as monitoring balance, transaction date) and keeping personal data and financial status confidential are strongly recommended.

Right of Data Subject

In accordance with the data protection law, a data subject has the following rights (which may be amended pursuant to any regulations of the data protection law) which are exercisable in compliance with applicable laws:

- Right to access
- Right to rectify
- Right to data portability
- Right to erasure
- Right to restrict
- Right to object the collection, use and disclosure
- Right to withdraw the consent

In case of you have given the consent for the processing of personal data to THAINAMTHIP (that the consent is not required by other applicable laws), you shall have the right to withdraw the consent at any time. Should a withdrawal of any consent affects any transactions or provision of services, you will be informed at the time of withdrawal request.

Review and Amendment to THAINAMTHIP's Privacy Policy

THAINAMTHIP reviews its Privacy Policy as deemed appropriate to ensure alignment with operational guidelines and legal requirements. Any necessary or appropriate amendments will be proposed for approval by the Board of Directors.

In the event of any changes to THAINAMTHIP's Privacy Policy, THAINAMTHIPth will clearly announce and communicate such changes.

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Contact

1. If you wish to exercise your right as set out in this privacy policy, please download “Data Subject Action Request Form” via www.thainamthip.co.th and send the completed form to through email DPO@thainamthip.co.th. Data Subject Action Request Form is also available at our head office, branches and representative offices.
2. If you wish to complaint about the processing of your personal data, please download “Personal Data Complaint Form” via www.thainamthip.co.th and send the completed form to through email DPO@thainamthip.co.th. Personal Data’s Complaint Form is also available at our head office, branches and representative offices.
3. THAINAMTHIP has appointed Mr. Dhana Bubphavanich to be the data protection officer to deal with any queries, recommendations or concerns regarding this privacy policy. You who have any queries or questions regarding this privacy policy may contact via www.thainamthip.co.th or via telephone number at +662984-2983 or through email DPO@thainamthip.co.th or THAINAMTHIP’s address.

SEND TO: Data Protection Officer

ThaiNamthip Corporation Public Company Limited

Address: 214 Moo 5 Vibhavadirangsit Road, Tung Song Hong, Laksi, Bangkok 10210, Thailand

Note:

1. When making any complaint or claim, please provide your contact details as to enable THAINAMTHIP to revert as soon as possible.
2. THAINAMTHIP does not charge any administrative fee relating to your personal data. However, a fee in processing certain requests (other than the request for rectification) under the data protection law may apply.

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Data Subject Action Request Form

Pursuant to the Personal Data Protection Act B.E. 2562, a data subject is entitled to exercise rights as prescribed by law, including but not limited to withdrawing consent, accessing personal data, requesting the rectification or erasure of personal data, restricting or objecting to the processing of personal data, and requesting the transfer of personal data. The data subject may exercise these rights by submitting a request to ThaiNamthip Corporation Public Company Limited ("THAINAMTHIP") as follows:

Complainant's Information

Complainant's Information

Full Name:	Thai and English (If any)
Address:	
Telephone number:	
Email:	
Affiliation with THAINAMTHIP:	

Are you the Data Subject?

☐ The Complainant is the same person as the data subject.

I hereby attach the following documents for the verification of the Complainant's identity and residency, enabling THAINAMTHIP to process the requested rights accurately.

Identity and/or Residency Verification Documents¹

- ☐ The copy of Thai National ID Card (Thai citizen).
- ☐ The copy of passport (Foreigner).
- ☐ Any other relevant documents (if applicable).

¹ Please consider, as appropriate to the situation, which documents or evidence may be used to identify the individual making the request.

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- ☐ If the Complainant is acting on behalf of the data subject or is their authorized agent, the details of the data subject must be filled out in the data subject details table.

Full Name:	
Address:	
Telephone number:	
Email:	
Affiliation with THAINAMTHIP:	

Herewith, I have attached the following documents for the verification of the authority, identity, and residence of the Complainant and the data subject, so that THAINAMTHIP can properly process the requested rights.

Documents proving the authority or agent to act on behalf of the data subject.

- ☐ Power of Attorney

Note: The power of attorney must have the following characteristics:

- (1) The content must state at least: "Grant the Complainant the authority to contact and request permission to exercise the rights [-please specify the name of the Complainant] _____ in the personal data of the data subject, as authorized to THAINAMTHIP, including carrying out all related actions until completion."
- (2) The document must be clearly signed
- (3) The document must be dated prior to the date of the application.

Identity and/or Residency Verification Documents ²

- ☐ A copy of the national ID card of the Complainant and the data subject (in the case of Thai nationality).
- ☐ A copy of the passport of the Complainant and the data subject (in the case of foreign nationality).

² Consider, as appropriate to the situation, which documents or evidence can be used to identify the data subject and the authorized representative.

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☐ Any other relevant documents (if applicable).

THAINAMTHIP reserves the right to request additional information or documents from the Complainant if the information provided does not clearly demonstrate that the Complainant is the data subject or has the authority to make such a request. THAINAMTHIP also reserves the right to deny your request.

Personal data for which the rights are requested to be exercised.

Please select the type of right you wish to exercise (only one type of right can be selected. If you wish to exercise more than one right, please submit separate request forms for each right to facilitate the processing of your request).

☐ Request for withdrawal of consent

Personal data to be processed.

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Source (if applicable).

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☐ Request for access to personal data

Personal data to be processed.

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Source (if applicable).

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☐ Request for correction of personal data

Personal data to be processed.

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Source (if applicable).

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☐ Request for deletion of personal data

Personal data to be processed.

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Source (if applicable).

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☐ Request to restrict the processing of personal data

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Personal data to be processed.

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Source (if applicable).

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☐ Request for data portability

Personal data to be processed.

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Source (if applicable).

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☐ Request to object to the processing of personal data

Personal data to be processed.

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Source (if applicable).

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Reasons for the request

If you are providing reasons for the request to exercise the rights of the data subject, please attach supporting documents, information, and evidence for the responsible party to consider and proceed with your request

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Rights Reserved by THAINAMTHIP

THAINAMTHIP would like to inform you that in the event of the following circumstances, THAINAMTHIP may be required to deny your request in order to comply with the relevant laws:

- (1) You are unable to clearly demonstrate that the requester is the data subject or has the authority to make the request.
- (2) The request is unreasonable, such as in cases where the requester has no right to request the deletion of personal data, or where the personal data is not held by THAINAMTHIP, etc.
- (3) The request is an unnecessary request, such as when the request is repetitive or contains the same content without reasonable grounds.
- (4) The collection of personal data for the purpose of exercising the freedom of expression, or for the purpose of creating historical documents or archives for public interest, or for research or statistical purposes, provided that appropriate safeguards are in place to protect the rights and freedoms of the data subject, or if necessary for the performance of a task carried out in the public interest by THAINAMTHIP, or for the exercise of official authority vested in THAINAMTHIP, or for the collection of sensitive personal data that is necessary for the performance of legal

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duties to achieve objectives in preventive medicine, occupational health, or public health benefits, in accordance with Section 26(5)(a) and (b) of the Personal Data Protection Act."

- (5) The retention of personal data is necessary for the establishment of legal claims, the exercise or defense of legal claims, or to comply with legal obligations.
- (6) The action adversely affects the rights and freedoms of other individuals.
- (7) The processing of data is in compliance with the laws of THAINAMTHIP.
- (8) The processing of data is necessary for the performance of a task carried out in the public interest by THAINAMTHIP, or the performance of a task in the exercise of official authority vested in THAINAMTHIP, or for compliance with legal obligations.
- (9) The processing of data is necessary for the performance of a contract between the data subject and THAINAMTHIP.
- (10) (10) The processing of data is necessary for the legitimate legal interests of THAINAMTHIP.

Normally, you will not incur any costs in processing your request. However, if it is clearly evident that your request is unreasonable or frivolous, THAINAMTHIP may charge a reasonable fee for processing the request to exercise your rights.

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Acknowledgment and Consent

You have read and fully understood the contents of this request form, and hereby confirm that the information provided to THAINAMTHIP is true and accurate. You acknowledge that the verification of authority, identity, and residence is essential for the consideration of your requested rights. Should you provide false information with fraudulent intent, you may be subject to legal action. Additionally, THAINAMTHIP may request further information from you for verification purposes to ensure the accurate and complete processing of your request

Therefore, you have affixed your signature hereunto as evidence.

Sign Complainant

(.....)

Date

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(Personal Data Complaint Form)

Under the Personal Data Protection Act B.E. 2562 (2019), ThaiNamthip Corporation Public Company Limited ("THAINAMTHIP"), as a data controller, may not process personal data without the data subject's prior or concurrent consent unless permitted by law. THAINAMTHIP ensures that any processing is conducted only to the extent necessary and in compliance with the lawful purposes of the data controller. THAINAMTHIP is committed to adhering to legal requirements and good governance principles.

If you identify any unauthorized processing of personal data, please provide details regarding the incident using the form below. THAINAMTHIP will conduct a review and provide a response accordingly.

Complainant's Information

Name-Surname	[Thai and English name (if available)]
Address:	
Contact Number:	
Email:	
Relationship with THAINAMTHIP:	

Are you the data subject?

☐ The Complainant is the same person as the data subject.

I have attached the following documents to verify the identity and address of the complainant, so that THAINAMTHIP can properly proceed with the verification:

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Identity verification document and/or address verification document. ¹

- ☐ Copy of the National ID card (for Thai citizens).
- ☐ Copy of the passport (for foreign nationals).
- ☐ Other documents (if applicable).
- ☐ The Complainant is the representative of the data subject (If the Complainant is the representative of the data subject, please fill in the details of the data subject in the table below).

Details of the Data Subject

Name-Surname	[Thai and English name (if available)]
Address:	
Contact Number:	
Email:	
Relationship with THAINAMTHIP:	

I have attached the following documents to verify the authority, identity, and address of both the complainant and the data subject, so that THAINAMTHIP can properly proceed with the verification:

Power of Attorney or Authorization Document

- ☐ Power of Attorney

Note: The Power of Attorney must have the following characteristics:

¹ Consider the appropriateness of the situation to determine which documents or evidence can be used to verify the identity of the individual submitting the complaint.

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(1) The content must at least state: "Granting the Complainant the authority to contact and file a complaint regarding the improper processing of the data subject's personal data with Thainamthip, including taking all related actions until the matter is resolved."

(2) The principal's signature must be clearly provided.

(3) The document must be dated before the date of filing the complaint.

- ☐ Copy of the National ID card of both the Complainant and the data subject (for Thai nationals).
- ☐ Copy of the passport of both the Complainant and the data subject (for foreign nationals).
- ☐ Other documents (if applicable).

THAINAMTHIP reserves the right to request additional information or documents from the Complainant if the provided information does not clearly establish that the Complainant is the data subject or has the authority to file the complaint. THAINAMTHIP also reserves the right to reject the complaint if the required information is insufficient.

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Details of the Complaint

	Details of the Incident
Date and Time of Reporting Improper Data Processing	[DD/MM/YY at [*] time]

Details of the Complaint

	Details of the Incident
Date and Time When Improper Data Processing Was Identified:	[DD/MM/YY at [*] time]
Nature of Improper Data Processing ³ :	
Type of data subject:	<div> <input type="checkbox"/> Customers and related individuals. <input type="checkbox"/> Employees of THAINAMTHIP </div> <div> <input type="checkbox"/> Directors and executives of THAINAMTHIP. <input type="checkbox"/> Contractors or individuals working for or providing services to THAINAMTHIP </div> <div> <input type="checkbox"/> Business partners and related individuals <input type="checkbox"/> Consultants and related individuals </div> <div> <input type="checkbox"/> Third parties </div>

³ The data was processed without consent through the [*] channel, or I was informed by the Call Center that they had received data from THAINAMTHIP.

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Type of Personal Data Improperly Processed:	<input type="checkbox"/> General information such Name-Surname, address, telephone number, Email, date of birth, education or Information on Shareholders and Directors. <input type="checkbox"/> Financial Information <input type="checkbox"/> Nationality, race, blood type, health information, criminal history, biometric data, sexual preferences. <input type="checkbox"/> Family information of the data subject.
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Details of the Complaint

	Details of the Incident
	<div> <input type="checkbox"/> Government documents, such as National ID card, passport, driver's license, civil servant ID card <input type="checkbox"/> Private sector documents, such as employee ID card, membership card, credit card, business card </div> <div> <input type="checkbox"/> Other information (please specify) <div>.....</div> <div>.....</div> </div>
How did you become aware of the improper data processing? ⁴ :	
Summary of the improper data processing incident and its impact (if any) ⁵ :	

Sign Complainant
(.....)

Note: The complainant may attach any available supporting documents to Thainamthip to assist in accurately reviewing the incident.

⁴ Seen on social media or contacted by an impersonator

⁵ To elaborate on the nature of improper data processing, to better understand the content of personal data processing, by explaining the content as clearly as possible, including a detailed description of the types of data involved.

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Document Control

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